



London Borough of Hammersmith & Fulham

Cabinet

Agenda

MONDAY
11 AUGUST 2014
7.00 pm

COURTYARD ROOM
HAMMERSMITH
TOWN HALL
KING STREET
LONDON W6 9JU

Membership

Councillor Stephen Cowan, Leader of the Council
Councillor Michael Cartwright, Deputy Leader
Councillor Sue Macmillan, Cabinet Member for Children and Education
Councillor Andrew Jones, Cabinet Member for Economic Development and Regeneration
Councillor Max Schmid, Cabinet Member for Finance
Councillor Vivienne Lukey, Cabinet Member for Health and Adult Social Care
Councillor Lisa Homan, Cabinet Member for Housing
Councillor Sue Fennimore, Cabinet Member for Social Inclusion
Councillor Wesley Harcourt, Cabinet Member for Environment, Transport & Residents Services

Date Issued
30 July 2014

If you require further information relating to this agenda please contact:
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Reports on the open Cabinet agenda are available on the Council's website: http://www.lbhf.gov.uk/Directory/Council_and_Democracy

PUBLIC NOTICE

The Cabinet hereby gives notice of its intention to hold part of this meeting in private to consider items 10 and 11 which are exempt under paragraph 3 of Schedule 12A to the Local Government Act 1972, in that they relate to the financial or business affairs of any particular person, including the authority holding the information.

The Cabinet has received no representations as to why the relevant part of the meeting should not be held in private.

Members of the Public are welcome to attend.
A loop system for hearing impairment is provided, together with disabled access to the building

DEPUTATIONS

Members of the public may submit a request for a deputation to the Cabinet on non-exempt item numbers **4-7** on this agenda using the Council's Deputation Request Form. The completed Form, to be sent to David Viles at the above address, must be signed by at least ten registered electors of the Borough and will be subject to the Council's procedures on the receipt of deputations. **Deadline for receipt of deputation requests: Wednesday 6 August 2014.**

COUNCILLORS' CALL-IN TO SCRUTINY COMMITTEES

A decision list regarding items on this agenda will be published by **Wednesday 13 August 2014**. Items on the agenda may be called in to the relevant Accountability Committee.

The deadline for receipt of call-in requests is: **Monday 18 August 2014 at 3.00pm**. Decisions not called in by this date will then be deemed approved and may be implemented.

A confirmed decision list will be published after 3:00pm on **Monday 18 August 2014**.

Cabinet Agenda

11 August 2014

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2. APOLOGIES FOR ABSENCE	
3. DECLARATION OF INTERESTS	
<p>If a Councillor has a disclosable pecuniary interest in a particular item, whether or not it is entered in the Authority's register of interests, or any other significant interest which they consider should be declared in the public interest, they should declare the existence and, unless it is a sensitive interest as defined in the Member Code of Conduct, the nature of the interest at the commencement of the consideration of that item or as soon as it becomes apparent.</p> <p>At meetings where members of the public are allowed to be in attendance and speak, any Councillor with a disclosable pecuniary interest or other significant interest may also make representations, give evidence or answer questions about the matter. The Councillor must then withdraw immediately from the meeting before the matter is discussed and any vote taken.</p> <p>Where Members of the public are not allowed to be in attendance and speak, then the Councillor with a disclosable pecuniary interest should withdraw from the meeting whilst the matter is under consideration. Councillors who have declared other significant interests should also withdraw from the meeting if they consider their continued participation in the matter would not be reasonable in the circumstances and may give rise to a perception of a conflict of interest.</p> <p>Councillors are not obliged to withdraw from the meeting where a dispensation to that effect has been obtained from the Audit, Pensions and Standards Committee.</p>	
4. COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT CHARGING SCHEDULE (DCS) CONSULTATION	8 - 334
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| 8. | FORWARD PLAN OF KEY DECISIONS | 361 - 376 |
| 9. | EXCLUSION OF PRESS AND PUBLIC | |

The Cabinet is invited to resolve, under Section 100A (4) of the Local Government Act 1972, that the public and press be excluded from the meeting during the consideration of the following items of business, on the grounds that they contain the likely disclosure of exempt information, as defined in paragraph 3 of Schedule 12A of the said Act, and that the public interest in maintaining the exemption currently outweighs the public interest in disclosing the information.

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| 10. | HOUSING ASBESTOS SURVEYS : EXEMPT ASPECTS (E) | |
| 11. | PARKING ENFORCEMENT ON HRA LAND : EXEMPT ASPECTS (E) | |

London Borough of Hammersmith & Fulham



Cabinet

Minutes

Monday 14 July 2014

PRESENT

Councillor Stephen Cowan, Leader of the Council
Councillor Michael Cartwright, Deputy Leader
Councillor Sue Macmillan, Cabinet Member for Children and Education
Councillor Andrew Jones, Cabinet Member for Economic Development and Regeneration
Councillor Max Schmid, Cabinet Member for Finance
Councillor Vivienne Lukey, Cabinet Member for Health and Adult Social Care
Councillor Lisa Homan, Cabinet Member for Housing
Councillor Sue Fennimore, Cabinet Member for Social Inclusion
Councillor Wesley Harcourt, Cabinet Member for Environment, Transport & Residents Services

7. MINUTES OF THE CABINET MEETING HELD ON 23 JUNE 2014

RESOLVED:

That the minutes of the meeting of the Cabinet held on 23 June 2014 be confirmed and signed as an accurate record of the proceedings, and that the outstanding actions be noted.

8. APOLOGIES FOR ABSENCE

There were no apologies for absence.

9. DECLARATION OF INTERESTS

The following members declared an interest in item 7 - 3rd Sector Investment Fund Allocation report:-

Councillor Lisa Homan as a Council representative/Trustee of the Hammersmith Citizens Advice Bureau.

Councillor Wesley Harcourt as a Trustee, in a private capacity, of the Hammersmith Citizens Advice Bureau.

Councillor Vivienne Lukey as the Chair of Hammersmith and Fulham Mind; not a Council representative.

The Members did not take part in the discussions nor did they vote on the item.

10. MAINTAINING COMPLIANCE WITH PUBLIC SERVICES NETWORK CODE OF CONNECTION

Cabinet was informed that the Council needs to maintain compliance with the PSN code of connection (CoCo) to secure continued access to the PSN. Without this access, the Council could not carry out some vital business functions. In response, Cabinet requested representations to be made to both the Cabinet Office and Treasury regarding the unnecessary cost associated with doing business with Central Government. The expenditure to maintain compliance with the PSN code of connection was wasteful and unnecessary red tape which could be avoided.

RESOLVED:

- 1.1. That officers seek to agree a risk-tolerant approach with PSNA.
- 1.2. That in the event that it is not possible to agree this risk-tolerant approach, approval be given to implement the fully PSN compliant solution for H&F remote access at a project cost of £147,991 and additional revenue costs per year of £49,457, making a total cost of £395,276 over five years.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

11. POSTAL SERVICES CONTRACT WITH ROYAL MAIL

Cabinet was informed that the contract will generate additional savings for the Council. Councillor Schmid noted that most Councils were entering into similar contracts which were significantly cheaper than the existing ones. Additional savings will also be generated by implementing the Administration's manifesto commitment to reduce printing and postage.

RESOLVED:

That the Council enters into a two year contract with Royal Mail to provide collection and delivery of letters and parcels to the addressee pursuant to Lot 1

of the Government Procurement Services (GPS) RM 782 Postal Services Framework Agreement.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

12. INFORMATION, ADVICE AND GUIDANCE SERVICES FOR YOUNG PEOPLE - COMMISSIONING STRATEGY

Officers informed Cabinet that the services will support the delivery of Statutory Responsibilities to:-

- Monitor and track all young people 16 – 19, as detailed in Section 68 of the Education and Skills Act 2008.
- Assess children and young people, who are eligible for an Education, Health and Care plan (by providing the specialist knowledge of post 16 options) as required by the Children and Families Act 2014.

In welcoming the savings generated by the new contract, Cabinet asked officers how the quality of the service delivered would be raised. It was noted the contractor's staff will be integrated into the single assessment process working in partnership with the Special Educational Needs and Health and Social Care teams.

RESOLVED:

1.1. That approval be given for the commissioning of a single contract for each of the following lots across the London Borough of Hammersmith & Fulham and the City of Westminster:

- Lot 1:- Tracking & Surveys - Intended Destinations and activity Surveys (Year 11-Year 13)
- Lot 2:- Careers Information Advice & Guidance Delivery;

both contracts to be 3 years in length, with an option to break after the second year, at a total estimated cost of: Lot 1 proposed budget £480,492 with a contribution to the budget from the London Borough of Hammersmith & Fulham of £240,246; and Lot 2 proposed budget of £640,556 with a contribution to the budget from the London Borough of Hammersmith & Fulham of £384,393.

- 1.2 That delegated authority be given to the Cabinet Member for Children and Education to approve the award of contracts.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

13. 3RD SECTOR INVESTMENT FUND ALLOCATION REPORT

Cabinet was informed that a month's extension to the existing grants was requested to give officers more time to consider the range of services to be recommended for funding and seek alternative funding options.

RESOLVED:

That an extension of one month be offered to those organisations which have applied for funding to deliver a service comparable/similar to the service they are already funded to provide, as set out in Appendix 1 of the report.

Councillors Lisa Homan, Wesley Harcourt and Vivienne Lukey declared an interest in the item. They did not take part in the discussions nor vote.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

14. FUTURE OF COVERDALE ROAD RESIDENTIAL CARE HOME

Cabinet noted that the Coverdale Road accommodation was no longer suitable for the residents' use. The residents will be assessed and transferred to more suitable alternative accommodation before the home is closed. Councillor Lukey noted that the transfer of residents will be a gradual process. She was working with Councillor Homan to develop a housing strategy for people with disabilities in partnership with two housing associations. Councillor Fennimore

noted that she had been consulted on this and was working with officers to ensure that the residents received the best offer.

RESOLVED:

- 1.1 That approval be given to Tri-borough Adult Social Care to carry out assessments for alternative placements for six service users residing at the Council run care home at Coverdale Road, and to move all six service users to suitable alternative care and support accommodation from June 2014 onwards.
- 1.2 That once recommendation 1 above has been implemented, the service should be closed.
- 1.3 That approval be given to Adult Social Care to consult staff and carry out a reorganisation of the Coverdale Road Service which will involve the deletion of 8 posts (5 currently filled).

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

15. EXCLUSION OF PRESS AND PUBLIC

RESOLVED:

That under Section 100A (4) of the Local Government Act 1972, the public and press be excluded from the meeting during consideration of the remaining items of business on the grounds that they contain information relating to the financial or business affairs of a person (including the authority) as defined in paragraph 3 of Schedule 12A of the Act, and that the public interest in maintaining the exemption currently outweighs the public interest in disclosing the information.

[The following is a public summary of the exempt information under S.100C (2) of the Local Government Act 1972. Exempt minutes exist as a separate document.]

16. MAINTAINING COMPLIANCE WITH PUBLIC SERVICES NETWORK CODE OF CONNECTION : EXEMPT ASPECTS (E)

RESOLVED:

That the report be noted.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

17. **POSTAL SERVICES CONTRACT WITH ROYAL MAIL : EXEMPT ASPECTS (E)**

RESOLVED:

That the report be noted.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

18. **INFORMATION, ADVICE AND GUIDANCE SERVICES FOR YOUNG PEOPLE - COMMISSIONING STRATEGY : EXEMPT ASPECTS (E)**

RESOLVED:

That the report be noted.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:

None.

19. **FUTURE OF COVERDALE ROAD RESIDENTIAL CARE HOME : EXEMPT ASPECTS (E)**

RESOLVED:

That the report be noted.

Reason for decision:

As set out in the report.

Alternative options considered and rejected:

As outlined in the report.

Record of any conflict of interest:

None.

Note of dispensation in respect of any declared conflict of interest:


None.

Meeting started: 7.00 pm

Meeting ended: 7.17 pm

Chairman

Agenda Item 4

 h&f hammersmith & fulham	London Borough of Hammersmith & Fulham CABINET 11 AUGUST 2014
COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT CHARGING SCHEDULE (DCS) CONSULTATION	
Report of the Cabinet Member for Economic Development and Regeneration ; Councillor Andrew Jones	
Open Report	
Classification: For Decision Key Decision: Yes	
Wards Affected: All	
Accountable Executive Director: Nigel Pallace, Bi-Borough Executive Director, Transport & Technical Services	
Report Author: Sid Jha, Policy Planner	Contact Details: 0208 753 7032 / sid.jha@lbhf.gov.uk

1. EXECUTIVE SUMMARY

- 1.1 Developers can provide contributions to help fund infrastructure needed to support development in the borough. These contributions can be by way of a Community Infrastructure Levy (CIL) and in the form of S106 Agreements. CIL will be charged at fixed rates of £/m² on most new development that creates net additional floorspace, subject to a number of exemptions and reliefs (see Appendix B of this report).
- 1.2 When CIL is introduced it will still be possible to have section 106 agreements (S106s) where these are necessary to make developments acceptable, provided that it is not for purposes on which the Council intends to spend CIL as shown in the published Regulation 123 List. S106s can continue to be used where necessary to secure contributions for infrastructure purposes (providing they are not on the R123 list and meet the restrictions on pooling), for non-physical infrastructure purposes and for securing affordable housing.
- 1.3 The proposed CIL DCS public consultation represents the 2nd stage of public consultation in the process that will lead to the introduction of CIL charges in the borough from 2015 according to the council's timetable (see section 5 of this report).

- 1.4 The proposed CIL charge rates have to be set primarily with regard to and the economic viability of development in the borough, but the council must strike an appropriate balance between the desirability of funding infrastructure from CIL the potential impact on viability (see section 5 of this report).

2. RECOMMENDATIONS

- 2.1. That approval be given for publication of the Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS) and associated evidence base documents for public consultation in accordance with Regulation 16 of the CIL Regulations 2010 (as amended).
- 2.2. That the strategy for securing the provision of, or financial contributions to, the cost of infrastructure to support development in White City East and Earls Court & West Kensington Opportunity Area should continue to be S106 agreements (S106s) rather than CIL (£0/m² CIL rates are proposed for these two areas in the CIL DCS).
- 2.3. That approval be given for public consultation on other related issues including the Equalities Impact Assessment (EqIA) and Neighbourhood CIL.
- 2.4. That the Bi-Borough Executive Director for Transport & Technical Services, in consultation with the Cabinet Member for Transport, Environment & Resident Services, be authorised to approve any technical and other minor amendments to the proposed public consultation documents.

3. REASONS FOR DECISION

- 3.1. Public consultation on the CIL DCS and associated evidence base documents is required in accordance with Regulation 16 of the CIL Regulations 2010 (as amended). As part of this, the Council must set out its approach to future S106s.
- 3.2. Public consultation on the EqIA is required to help ensure that the Council's equality duties are fulfilled (in advance of a final EqIA being produced for a final decision to bring the CIL into effect).
- 3.3. Public consultation on Neighbourhood CIL is required to help the Council plan for the expenditure of Neighbourhood CIL and engage with communities in accordance with statutory National Planning Practice Guidance (NPPG) on CIL (para. 073).

4. INTRODUCTION AND BACKGROUND

- 4.1 The Community Infrastructure Levy (CIL) has been introduced to enable local authorities to help fund new physical infrastructure facilities, needed to make development acceptable and sustainable. In addition to the CIL charge, local authorities will still be able to negotiate S106 Agreements, particularly on larger developments, to provide for, or to fund affordable housing, for site specific infrastructure improvements, and for other non-infrastructure purposes, such as employment and training schemes, necessary to make particular schemes acceptable
- 4.2 The CIL charge rate proposed by the Council has to take account of other obligations and policy requirements that might affect the viability of development and is only one element of the total contribution that the Council can receive for a given development. CIL will be charged at fixed rates of £/m² on most new development that creates net additional floorspace, subject to a number of exemptions and reliefs.
- 4.3 The proposals for CIL in LBHF envisage that future development contributions for physical infrastructure will generally be by means of CIL charges which will help fund the facilities that are needed to support development in the borough (except in areas discussed later in this report). The Council must publish a R123 list of the infrastructure on which it intends to spend CIL and that effectively rules out also having future S106 obligations for the same infrastructure. There will also be strict limits on the extent to which contributions from S106 obligations for infrastructure can be pooled. All this means that in future most developments will pay the fixed charge borough CIL (as well as Mayoral CIL) and some developments will also be required to make S106 contributions but overall S106 contributions will be scaled down.

What does and does not pay CIL?

- 4.4 National legislation sets out how CIL operates once a Council has set charge rates. In accordance with national legislation, CIL may be payable on development which creates net additional floorspace, where the gross internal area (GIA) of new build exceeds 100m². That limit does not apply to new dwellings, and a charge can be levied on a single house or flat of any size, unless it is built by a 'self-builder'. Some development, including social housing and charitable development does not pay CIL. Further information on what does and does not pay CIL and the payment process is covered in section 1 of Appendix B.

5. PROPOSAL AND ISSUES

Evidence base & striking a balance

- 5.1. Statutory National Planning Practice Guidance (NPPG) on CIL expects CIL to have a positive economic effect on development in a council's area

and the Council must show and explain how the proposed CIL will contribute towards the implementation of both the Mayor of London's adopted London Plan (as altered) and the Council's adopted Core Strategy and Development Management Local Plan (see sections 2.1 and 2.2 of Appendix B).

- 5.2. The proposed CIL charge rates have to be set primarily with regard to the economic viability of development in the borough, but the Council must strike an appropriate balance between the desirability of funding infrastructure from CIL and the potential impact on viability (see section 2.1 of Appendix B).

Viability

- 5.3 The Council must set CIL charges which do not threaten the ability to develop viably the sites and scale of development identified in the adopted Core Strategy.
- 5.4 A Viability Study has been prepared (Appendix 5) which assumes a policy-compliant level of affordable housing (40%) in line with the adopted Core Strategy. The Viability Study has also considered the amount of financial contribution that might be charged through a S106 agreement. This is particularly the case for White City East and Earls Court & West Kensington. The proposed approach to S106s after CIL is introduced is set out later in this section of the report.
- 5.5 Further information on the Viability evidence base is covered in section 4 of Appendix B and Appendix 5 (Viability Study).

Proposed CIL charge rates

- 5.6 The proposed CIL charge rates (Appendix A) are as follows and are additional to the Mayor's CIL:

Uses	Residential (C3)	Office (B1a/b)	All uses unless otherwise stated	Health
	HMO (C4)			Education
Hostel		£80/m ²	£80/m ²	Industrial (B1(c)/B2)
	Warehousing (B8)			
Charging Zones*	£100/m ²	Nil	£80/m ²	Selling / display of motor vehicles
				Scrapyards
North	£200/m ²	Nil	£80/m ²	Hotel (C1)
Central A	£400/m ²	£80/m ²	£80/m ²	Nil
Central B		Nil		
South	Nil			
White City East	Nil			

Earls Court & West Kensington Opportunity Area		
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*A map of the CIL Charging Zones is provided in section 5.1 of Appendix B

- 5.7 The Council has only set the differential rates, including zero rates, where this is based on economic viability evidence which justifies this approach. In light of the government guidance on state aid and relevant legislation, it is considered that these proposals do not give rise to unlawful state aid (see section 5.8 of Appendix B).
- 5.8 The proposed charge rates are broadly comparable to those established and emerging in the neighbouring boroughs (see section 4.5 of Appendix B and Appendix 6).

Regeneration Areas & S106s

- 5.9 In White City East and Earls Court & West Kensington Opportunity Area it is recommended that all development contributions for infrastructure should continue to be by negotiated S106 obligations rather than CIL which would have a zero charge.
- 5.10 The reason for this is that there is a considerable scale of site specific and local infrastructure that is needed specifically to make developments in these areas acceptable. There have already been substantial contributions (often to a pooled sum) from approved S106s. Based on the CIL Viability Study (Appendix 5), it is clear that developments in these areas would not be sufficiently viable to pay CIL in addition to substantial S106s.
- 5.11 In South Fulham Riverside, which is the principal development area in the South Charging Zone, there is also a considerable scale of infrastructure which is needed specifically to make development in this area acceptable. In view of the size of the area and the number of potential developments (having regard to the future restrictions on pooling S106 obligations), CIL is considered to be the more appropriate primary mechanism for raising developer contributions and the CIL Viability Study (Appendix 5) suggests that residential developments could afford to pay CIL at £400/m². Where appropriate, to ensure schemes are acceptable additional S106 obligations could be sought.
- 5.12 For more detail on the approach to regeneration areas and S106s as part of the viability evidence base, see section 4.2 of Appendix B.

Infrastructure

- 5.13 An infrastructure planning exercise, undertaken primarily for the purposes of CIL charge-setting, has identified a £379 million funding gap for potential physical infrastructure schemes which support development across the borough and could potentially benefit from CIL. It has been

estimated that the proposed CIL charge rates could contribute approximately £58.3m towards this funding gap over the period 2014/15-2032 (see Figure 3.11 of Appendix B). In estimating the funding gap, assumptions have been made concerning the contribution of existing significant S106s.

- 5.14 This demonstrates that CIL will only be able to make a contribution towards the borough's total infrastructure funding gap and it will not be able to cover the costs for all schemes. It would be expected that other sources of funding (including other developer contributions such as S106s) will become available over time and these could reduce the funding gap, however, it would be unrealistic to expect that the overall resultant funding gap would not be substantial. This is not an unusual finding for Councils when researching infrastructure funding gaps for CIL charge-setting purposes.
- 5.15 Decisions on expenditure of CIL, once it is in effect and receipts start to accumulate, will need to be made as part of the Council's financial and decision-making structures, as appropriate.
- 5.16 Further information on the Infrastructure evidence base, including definitions and categories of infrastructure, is covered in section 3 of Appendix B and Appendices 2 (Infrastructure Categories) and 3 (Infrastructure Schedule).

Neighbourhood CIL

- 5.17 The Council must allocate at least 15% of CIL receipts to spend on priorities that should be agreed with the local community in areas where development is taking place (capped at £100 per council tax registered dwelling). This Neighbourhood CIL can be spent on anything that is concerned with addressing the demands that development places on an area, including but not limited to infrastructure. The proportion increases to 25% where there is an adopted Neighbourhood Plan.
- 5.18 Neighbourhood CIL could equate to approximately £490,000 per year on average for the borough as a whole. However, this figure is based on a broad estimate and the actual Neighbourhood CIL expenditure would depend on the actual quantum and location of CIL-liable development which gets built.
- 5.19 Whilst it will be some time before substantial amounts of CIL are likely to be received by the Council for use on Neighbourhood CIL, it is appropriate to use the proposed Draft Charging Schedule consultation as the first opportunity for suggestions for Neighbourhood CIL expenditure to be put forward.
- 5.20 Further information on the Neighbourhood CIL is covered in section 3.3 of Appendix B, and a Form for suggesting Neighbourhood CIL suggestions is provided in Appendix 11 (Consultation Response Form).

Draft Regulation 123 ('R123') List

- 5.21 The Council must ensure there is clarity about the Council's infrastructure needs and what developers will be expected to pay for through which route (CIL or S106).
- 5.22 To assist with providing clarity about S106s and the interface with CIL, Regulation 123 ('R123') of the CIL Regulations 2010 (as amended) allows the Council, upon adoption of the CIL, to set out a list of those projects or types of infrastructure that it intends to fund, or may fund, through CIL. If an item of infrastructure is on the R123 List, the Council cannot require a S106 to make provision or fund it, as part of approving a planning application. If no List is published, the Council cannot require a S106 for any infrastructure and all infrastructure would be funded by CIL
- 5.23 As part of the appropriate evidence to inform the preparation of the charging schedule, the Council must set out a draft of the R123 List and any known site-specific matters for which S106s may continue to be sought. The Draft R123 List is set out in Appendix 4 (Draft R123 List).
- 5.24 After the Council starts charging CIL, the Council must prepare short reports on CIL by the end of each calendar year for the previous financial year covering information including: CIL receipts and expenditure on items of infrastructure and Neighbourhood CIL (see section 5.12 of Appendix B).
- 5.25 For more detail on the R123 List, see section 3.2 of Appendix B and Appendix 4 (Draft R123 List).

What is the timetable for the Council's CIL?

- 5.26 The timetable to date, and the expected future timetable for the council's CIL is set out below (subject to change):
- Monday 18th July 2011 Cabinet Member Decision: Procurement of a CIL Viability Assessment
 - Friday 7th September to Friday 19th October 2012 (6 weeks) 1st stage public consultation (closed): Preliminary Draft Charging Schedule (PDCS)
 - **Friday 22nd August to Friday 3rd October 2014 (8 weeks)** 2nd stage public consultation: **Draft Charging Schedule (DCS)**
 - Autumn / Winter 2014 Submission of DCS for examination
 - Late 2014 Independent public examination
 - Early 2015 Publication & effect

5.27 It should be noted that the Mayor of London CIL Charging Schedule for Greater London came into effect on 1st April 2012 for which a charge of £50/m² is levied in the borough, although medical/health services and schools/colleges have a zero or nil charge (£0/m²). The Mayor's CIL is intended to raise £300m towards the cost of Crossrail. The council, as the statutory collecting authority, has been collecting the Mayor's CIL in the borough since it came into effect.

6. OPTIONS AND ANALYSIS OF OPTIONS

6.1 This report recommends that the Council continues with the introduction of CIL in the borough by way of publishing the DCS and associated evidence base documents for public consultation. Negotiation of S106s would continue for site-specific purposes, and for non-infrastructure purposes, but scaled back such that funding of infrastructure to generally support development in the borough as a whole would in future largely come from CIL. However, the council is not required to introduce CIL and it would continue to rely wholly on negotiating S106s to fund infrastructure. In considering this option, it should be noted that:

- From April 2015, pooling of S106 planning obligations towards infrastructure costs will be limited. It will not be possible to grant permission based on a planning obligation that contributes to an infrastructure project or type if there are already five or more contributing obligations entered into since April 2010.
- With CIL, all development that is liable will make a contribution to general infrastructure costs. This means that development will contribute through CIL even though a S106 may not have been justified or possible because of the pooling restrictions. In effect, CIL provides unlimited pooling and, in practice, many more developments will contribute to infrastructure costs than has been (or could be) possible under S106 alone.

6.2 There is a general expectation that when CIL is introduced, S106s should be scaled back to those matters that are directly related to a specific site; however, the government considers there is still a legitimate role for development-specific planning obligations (see section 3.2 of Appendix B).

6.3 Three options for the CIL DCS consultation are analysed below:

Option	When undertake CIL DCS consultation?	When could CIL come into effect at the earliest?	Impact on income for infrastructure
1	Summer 2014	Early 2015	Maximises potential income
2	Delay until Autumn / Winter 2014	Mid/Late 2015	Less potential income due to S106 pooling restrictions from April 2015 (see above) and delayed CIL income (average estimated £3m/year opportunity cost)
3	Do not implement CIL	Never	No CIL income Less potential S106 income due to pooling restrictions (see above)

6.4 In light of the above analysis, the preferred option is Option 1.

7. CONSULTATION

What comments have been made so far?

7.1 As set out in section 4 of this report, the CIL DCS represents the 2nd stage of public consultation following a 1st stage ('PDCS') which was undertaken in September – October 2012. Subsequently, the Council has had further discussions with some of those who made representations (including early engagement with local developers and the property industry). The principal areas of comment so far have been:

- CIL Charging Zones
- Affordable housing
- S106 costs
- Sample sites
- Development costs and values
- CIL charges and uses
- CIL policies

7.2 Further detail on the comments made so far is provided in section 6.2 of Appendix B and Appendices 8 and 9 (PDCS Reps & Council Responses).

Who is being consulted?

7.3 The proposed CIL DCS consultation will involve communities, neighbourhoods, local businesses, ward councillors, neighbouring boroughs, the Mayor of London, the London Enterprise Panel, local developers and the property industry, infrastructure providers and all bodies consulted at the 1st stage ('PDCS') including voluntary bodies (see section 6.3 of Appendix B).

What is being consulted on?

- 7.4 Representations are welcomed regarding the CIL DCS and associated evidence base documents (such representations will be submitted to an independent examiner as part of the independent public examination – see section 4 of this report) and the Neighbourhood CIL and the EqIA (such representations will be considered by the council). Further detail is provided in section 6.4 of Appendix B.
- 7.5 Further detail on the proposed CIL DCS consultation is provided in section 6 of Appendix B and Appendices 10 (Notice & Statement of the Representations Procedure) and 11 (Consultation Response Form).

8. EQUALITY IMPLICATIONS

- 8.1 An Equalities Impact Assessment (EqIA) was consulted on for the 1st stage public consultation ('PDCS') for which no comments were received.
- 8.2 An updated EqIA (Appendix 7) has been undertaken for this 2nd stage public consultation (DCS) for which further comments will be welcomed in advance of a final EqIA being produced for a final decision to bring the CIL into effect. The protected characteristics considered in the EqIA include:
- Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion/belief (including non-belief)
 - Sex
 - Sexual orientation
- 8.3 The charges in the proposed DCS are considered to have a generally neutral effect on the protected characteristics. When the potential investment in infrastructure to support development in the borough is considered, the charges in the proposed DCS are considered to have a generally positive effect on the protected characteristics.

9. LEGAL IMPLICATIONS

- 9.1 The proposed consultation is in accordance with the Planning Act 2008, the Localism Act 2011 and the CIL Regulations 2010 (as amended). The full legislative context is set out in sections 2.2, 3.1, 4.1 and 5.7 of Appendix B. These are considered in the main body of the report.
- 9.2 Implications verified by Alex Russell, Senior Solicitor (Planning, Highways and Licensing) 0208 753 2771.

10. FINANCIAL AND RESOURCES IMPLICATIONS

- 10.1 As part of the CIL charge-setting evidence base and consultation process, the Council must provide an estimate of future CIL income to assess how this would address the identified infrastructure funding gap. It has been estimated that the proposed CIL charge rates could generate approximately £58.3m over the period 2014/15-2032. This is based on known future housing sites and future commercial floorspace quantum remaining to be developed (see Figure 3.11 of Appendix B).
- 10.2 The estimated costs of the CIL DCS consultation and examination (excluding existing staff cost budgets) are estimated at £30-40,000 which can be met by the existing Policy & Spatial Planning budget. This will not be claimed to revenue and will be refunded as future CIL receipts are collected which will commence from early 2015. Regulation 61 of the CIL Regulations 2010 (as amended) allows up to 5% of CIL receipts to cover the costs incurred by the council in establishing the CIL charging schedule.
- 10.3 Implications verified by Gary Hannaway, Head of Finance (Transport & Technical Services) 0208 753 6071.

11. RISK MANAGEMENT

- 11.1 The CIL is overseen by a CIL Project Board chaired by the Bi-Borough Executive Director, Transport & Technical Services. As part of the CIL Project Board, a Risk Log is maintained for the project. The key risk relating to the recommendations in this report relate to delay and financial implications, for which the options have been analysed in section 6 of this report.
- 11.2 Implications completed by Sid Jha, Policy Planner 0208 753 7032.

12. PROCUREMENT AND IT STRATEGY IMPLICATIONS

- 12.1 Whilst most of the work required to establish the CIL charging schedule has been undertaken 'in house', some work requires the use of external consultants relating to expert CIL and viability advice.
- 12.2 The Cabinet Member Decision on Monday 18th July 2011 'Procurement of a CIL Viability Assessment' allowed the appointment of Roger Tym & Partners, now operating under the name Peter Brett Associates, which produced the Viability Study (Appendix 5).
- 12.3 Work required during and in advance of the independent public examination will require some further use of the consultants, which will be procured through existing contracts, within the existing Policy & Spatial Planning budget and through the appropriate procurement procedures where necessary.

12.4 Implications verified by Alan Parry, Procurement Consultant 0208 753 2581.

LOCAL GOVERNMENT ACT 2000
LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
1.	N/A	N/A	N/A

LIST OF APPENDICES:

Appendix A CIL DCS

Appendix B CIL DCS Consultation Document with Appendices:

Appendix 1 Glossary

Appendix 2 Infrastructure Categories & Relevant Strategies

Appendix 3 Infrastructure Schedule

Appendix 4 Draft R123 List

Appendix 5 Viability Study

Appendix 6 Neighbouring Authorities' Residential CIL Charge Rates

Appendix 7 Equalities Impact Assessment (EqIA)

Appendix 8 PDCS Reps & Council Responses

Appendix 9 PDCS Reps & Council Responses: Summary

Appendix 10 Notice & Statement of the Representations Procedure

Appendix 11 Consultation Response Form

Appendix 12 Ward Maps

Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS)

August 2014

Introduction

This document should be read alongside the council's **Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS) Consultation Document** which provides the full background and commentary to the council's proposed CIL charge rates.

The documentation can be viewed at www.lbhf.gov.uk/cil.

Charge rates

Charging Zones	Uses			All uses unless otherwise stated	Health*
	Residential (C3)	Office (B1a/b)	HMO (C4)		Education**
	Hostel				Industrial (B1(c)/B2)
					Warehousing (B8)
	Selling/display of motor vehicles				
					Scrapyards
					Hotel (C1)
North	£100/m ²	Nil		£80/m ²	Nil
Central A†	£200/m ²	£80/m ²			
Central B		Nil			
South	£400/m ²				
White City East‡	Nil				
Earls Court & West Kensington Opportunity Area‡	Nil				

* Health is defined as “Development used wholly or mainly for the provision of any medical or health services except for the use of the premises attached to the residence of the consultant or practitioner”.

** Education is defined as “Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education”.

† The Central A Charging Zone boundary is the same as the Hammersmith Town Centre boundary on the council's adopted Proposals Map.

‡ It should be noted that, whilst a £0/m² (nil) rate is proposed at White City East and Earls Court & West Kensington Opportunity Area, this does not mean that the council will not receive significant financial contributions from developments in these areas as S106s will continue to be used.



Charging authority

The charging authority is the London Borough of Hammersmith & Fulham.

Date of approval

The Charging Schedule was approved by the council on [date to be inserted].

Date of effect

The Charging Schedule will become effective on [date to be inserted].

Calculation of CIL charge & indexation

The 'Chargeable Amount', including indexation to take into account inflation, will be calculated in accordance with Part 5 of the Community Infrastructure Levy Regulations 2010 (as amended).

Statutory compliance

The Charging Schedule has been issued, approved and published in accordance with the CIL Regulations 2010 (as amended), Part 11 of the Planning Act 2008 (as amended) and Part 6 of the Localism Act 2011 (as amended).

Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS) Consultation Document

August 2014



www.lbhf.gov.uk/cil

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1. Introduction

1.1 What is the CIL?

- 1.1.1 The Community Infrastructure Levy (CIL) is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area¹.
- 1.1.2 Once established, CIL will run alongside Section 106 agreements ('S106s') which will continue to operate where it is necessary to make developments acceptable.
- 1.1.3 The CIL is established by the following legislation and statutory guidance issued by the Secretary of State (which the council must have regard to²) which are referenced throughout this document, usually as footnotes:
- **Planning Act 2008;**
 - **Localism Act 2011;**
 - **The Community Infrastructure Levy Regulations 2010 (as amended 2011, 2012, 2013, 2014)** ('Rx', where *x* refers to a CIL Regulation); and
 - **National Planning Practice Guidance: Community Infrastructure Levy (February 2014)** ('NPPGx', where *x* refers to a paragraph).

1.2 How does it affect me?

What pays CIL?

- 1.2.1 The levy may be **payable on development which creates net additional floorspace**, where the gross internal area (GIA) of new build exceeds 100m². That limit does not apply to new dwellings, and a charge can be levied on a single house or flat of any size, unless it is built by a 'self builder'³.

What does not pay CIL?

- 1.2.2 The following do not pay the levy⁴:
- Development of **less than 100m²** – unless this is a whole dwelling, in which case the levy is payable⁵;
 - Houses, flats, **residential annexes and residential extensions** which are built by '**self-builders**'⁶;

¹ NPPG001

² Planning Act 2008 S221

³ NPPG002

⁴ NPPG003

⁵ R42

- **Social housing** that meets the relief criteria⁷;
- **Charitable development** that meets the relief criteria⁸;
- Buildings into which **people do not normally go**⁹;
- Buildings into which **people go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery**¹⁰;
- **Structures which are not buildings**, such as pylons and wind turbines;
- Specified types of development which local authorities have decided should be subject to a **'zero' rate** and specified as such in their charging schedules; and
- **Vacant buildings** brought back into the same use¹¹.

1.2.3 Where the CIL liability is calculated to be less than £50, the chargeable amount is deemed to be zero so no CIL is due¹².

1.2.4 Mezzanine floors of less than 200m², inserted into an existing building, are not liable for the CIL unless they form part of a wider planning permission that seeks to provide other works as well¹³.

Who pays CIL?

1.2.5 Landowners are ultimately liable to pay the levy, but anyone involved in a development may take on the liability to pay¹⁴.

How does CIL relate to planning permission?

1.2.6 CIL is charged on new development. Normally this requires planning permission from the council, the Planning Inspectorate, or the Secretary of State on appeal. CIL may also be payable on permitted development¹⁵.

⁶ R42A, 42B, 54A, 54B

⁷ R49 or 49A

⁸ R43-48

⁹ R40(11)

¹⁰ R40(11)

¹¹ R40(11)

¹² R40(3); NPPG003

¹³ NPPG003

¹⁴ R31-39; NPPG005

¹⁵ R5; R64; NPPG006

What are the stages in the collection process?

- 1.2.7 The stages in the collection process for CIL are¹⁶:
- Developments become liable for CIL upon planning permission at which point the council issues a **Liability Notice** to the applicant¹⁷.
 - The relevant person(s) then submit a **Commencement Notice** to the council setting out when development is going to start¹⁸.
 - The council then issues a **Demand Notice** to the relevant person(s) setting out the payment due dates in line with the payment procedure (including the possibility of paying by **Instalments**)¹⁹.
- 1.2.8 Further information on the collection process for CIL can be found in the government's National Planning Practice Guidance (NPPG) on CIL²⁰ which is accessible from the council's CIL webpage at www.lbhf.gov.uk/cil.

How is CIL liability calculated?

- 1.2.9 Once rates are set for an area, a CIL liability for a development is calculated in accordance with Part 5 of the CIL Regulations (as amended) which takes into account what does and does not pay CIL (see above) and other factors such as reliefs and exemptions²¹, existing floorspace and an indexation for inflation.
- 1.2.10 Further information on calculating CIL liabilities can be found in the government's National Planning Practice Guidance on CIL which is accessible from the council's CIL webpage at www.lbhf.gov.uk/cil. The council also intends to publish a CIL calculator on the CIL webpage once the CIL comes into effect in the borough to provide a guide in calculating CIL liabilities.

1.3 How do I comment & what is the timetable?

- 1.3.1 Section 6 sets out how to comment and the timetable for consultation and introduction of the borough's CIL.
- 1.3.2 Formal representations are welcomed on the **Infrastructure** evidence (section 3), the **Viability** evidence (section 4) and the **Draft Charging Schedule** (section 5).
- 1.3.3 Comments are also welcome on other related issues, including proposals for **Neighbourhood CIL** (section 3.3), which are separate to the formal Draft Charging Schedule consultation.

¹⁶ NPPG046

¹⁷ R65

¹⁸ R67

¹⁹ R69; R69B; R70

²⁰ NPPG Section 3

²¹ NPPG Section 7

2. Evidence base, legislative & policy context

2.1 Evidence base & striking a balance

- 2.1.1 In setting the CIL, the council must have regard to “actual and expected costs of **infrastructure**”; “economic **viability** of development” and “other actual and expected sources of funding for infrastructure”²².
- 2.1.2 As part of this, the council “must use **appropriate available evidence** to inform [its] preparation of [the] charging schedule”²³.
- 2.1.3 The council must then use that evidence to “**strike an appropriate balance** between the desirability of funding from CIL (in whole or in part) the actual and expected **estimated total cost of infrastructure required to support the development of its area**, taking into account other actual and expected sources of funding; and the potential effects (taken as a whole) of the imposition of CIL on the **economic viability of development across its area**”²⁴.
- 2.1.4 The CIL “is expected to have a **positive economic effect on development**” across the Local Plan area and the council must show and explain how the proposed CIL “will **contribute towards the implementation of [the] relevant plan and support development across [the] area**”²⁵.
- 2.1.5 For the purpose of this Draft Charging Schedule, the “**relevant plan**”²⁶ is the Mayor of London’s adopted London Plan (as altered) and the council’s adopted Core Strategy and Development Management Local Plan (DM LP).
- 2.1.6 **The council considers that in light of the viability and infrastructure evidence presented in sections 3 and 4 respectively, the proposed CIL charges in section 5 meet the above requirements and strike an appropriate balance.**

2.2 Legislative & policy context

- 2.2.1 The legislation, regulations, policy and guidance context for CIL, infrastructure planning and viability are summarised in the following sections, which help form the basis of the appropriate available evidence.
- 2.2.2 The documents are discussed and referenced in more detail in the appropriate Infrastructure and Viability sections (section 3 and 4 respectively).

²² Planning Act 2008 S211(2)

²³ Planning Act 2008 S211(7A); see also R11(1) “relevant evidence”

²⁴ R14(1); NPPG Section 2

²⁵ NPPG009; NPPG018; see also Crossrail SPG paras.6.8, 6.9

²⁶ NPPG011

National

Publisher	Date	Document
HM Government	May 1990	The Town and Country Planning Act 1990 (as amended by the Planning and Compensation Act 1991 and others)
	Nov 2008	Planning Act 2008
	Nov 2011	Localism Act 2011 (which amends the Planning Act 2008)
	2010-14	The Community Infrastructure Levy Regulations 2010 (as amended 2011, 2012, 2013, 2014)
DCLG	Mar 2012	National Planning Policy Framework (NPPF)
	Mar 2014	National Planning Practice Guidance (NPPG): Local Plans
	Mar 2014	National Planning Practice Guidance (NPPG): Planning Obligations
	Mar 2014	National Planning Practice Guidance (NPPG): Viability
	Jun 2014	National Planning Practice Guidance (NPPG): Community Infrastructure Levy

Figure 2.1: National documents

Regional

Publisher	Date	Document
Mayor of London	Jul 2011	The London Plan: Spatial Development Strategy for Greater London
	Feb 2012	CIL Charging Schedule
	Jan 2013	London Plan Implementation Plan 1
	Mar 2013	CIL Instalments Policy
	Apr 2013	Use of Planning Obligations in the Funding of Crossrail, and the Mayoral CIL SPG ('Crossrail SPG')
	Oct 2013	The London Plan: Spatial Development Strategy for Greater London: Revised Early Minor Alterations: Consistency with the National Planning Policy Framework
	Jan 2014	Draft Further Alterations to The London Plan (FALP)
	Mar 2014	Long Term Infrastructure Investment Plan for London: Progress Report
	May 2014	London Planning Statement SPG
	Jun 2014	Draft Social Infrastructure (SI) SPG

Figure 2.2: Regional documents

- 2.2.3 The **Mayor of London CIL Charging Schedule** for Greater London came into effect on 1st April 2012 for which a charge of £50/m² is levied in the borough, although medical/health services and schools/colleges have a zero or nil charge (£0/m²). The cost to developers of paying the Mayor's CIL is taken into account in the viability evidence base for the borough CIL (see section 4.2.4.3)²⁷. The Mayor's CIL is intended to raise £300m towards the cost of Crossrail.
- 2.2.4 The adopted **London Plan** (as altered) sets a monitoring target of 615 new dwellings to be delivered on an annual basis for the borough from 2011-2021²⁸, amongst other policies and targets.
- 2.2.5 It should be noted that the Mayor has proposed **Draft Further Alterations to the London Plan (FALP)** for consultation which suggest an increased monitoring target of 1,031 dwellings for the borough from 2015-2025, amongst other alterations to policies and targets. The FALP, however, is not scheduled to be examined until September 2014 and adopted until March 2015.

Local

Publisher	Date	Document
LBHF	Sep 2007	Community Strategy 2007-14
LBHF	Oct 2011	Core Strategy
LBHF	Jul 2013	Development Management Local Plan (DM LP)
LBHF	Jul 2013	Planning Guidance Supplementary Planning Document (PG SPD)
LBHF	Jul 2013	Local Plan Review: Issues and Options for Review
LBHF	Aug 2014	Monitoring Report April 2012 to March 2013

Figure 2.3: Local documents

- 2.2.6 The adopted **Community Strategy 2007-14**, which is in its last year of effect, sets out seven key priorities for the borough:
- Provide a top quality education for all;
 - Tackle crime and antisocial behaviour;
 - Deliver a cleaner, greener borough;
 - Promote home ownership;
 - Set the framework for a healthy borough;
 - Deliver high quality, value for money public services; and
 - Regenerate the most deprived parts of the borough.

²⁷ R14(3); NPPG026; Crossrail SPG para.6.4

²⁸ The London Plan Policy 3.3 Increasing Housing Supply; Table 3.1

2.2.7 The **Core Strategy** is the overall strategic plan for the borough and shares the same vision and objectives as the Community Strategy. It proposes significant growth to be spatially distributed across the borough's five Regeneration Areas as set out in Figures 2.4 and 2.5:

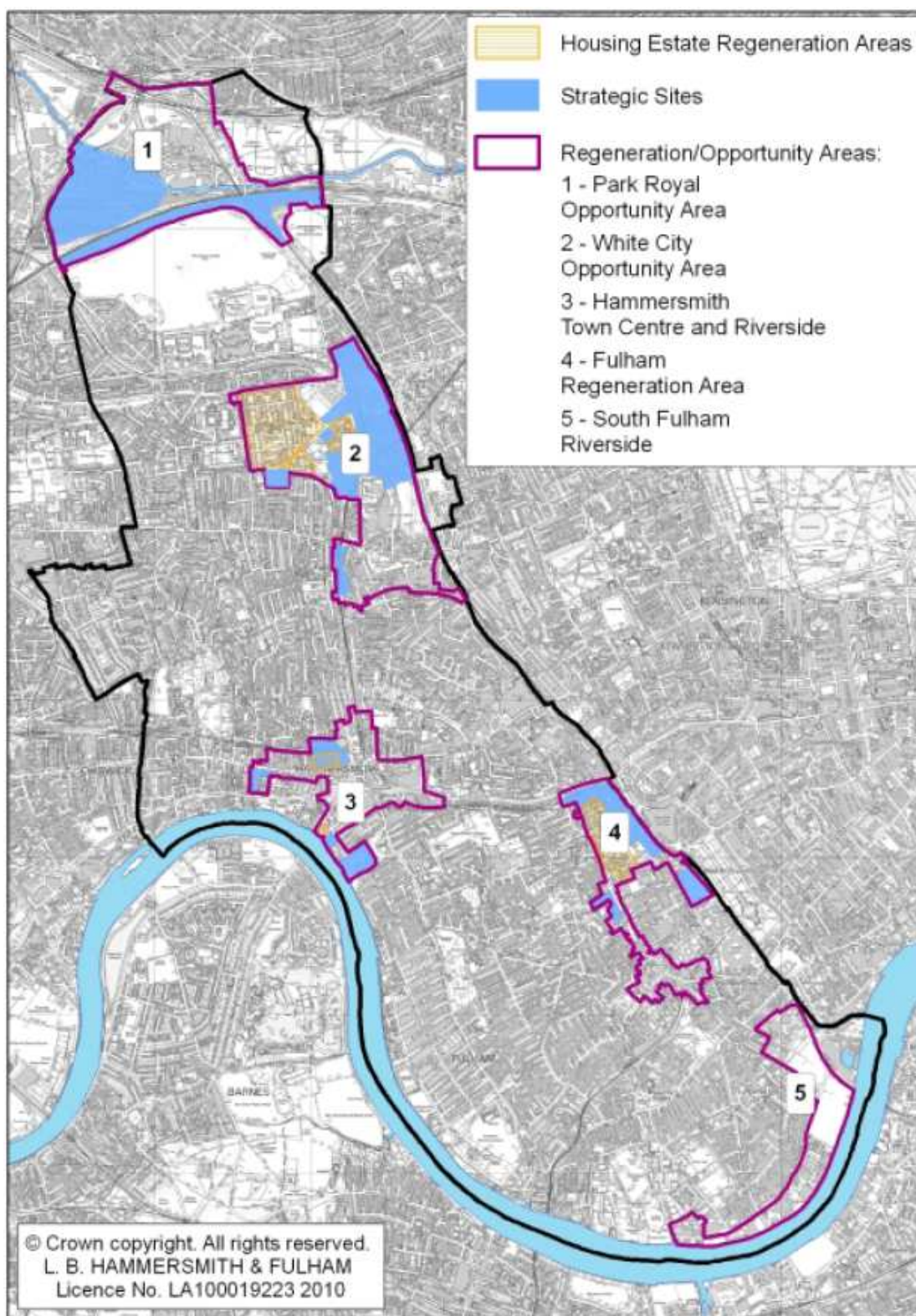


Figure 2.4: Core Strategy Strategic Policy A Map

Area	Dwellings						Jobs
	2012-17	2017-22	Total 10 yrs	2022-27	2027-32	Total 20 yrs	
Park Royal Opportunity Area	0	0	0	400	1,200	1,600	5,000
White City Opportunity Area	1,200	1,400	2,600	1,300	1,100	5,000	10,000
Hammersmith Town Centre & Riverside	500	500	1,000	0	0	1,000	5,000 -6,000
Fulham Regeneration Area (including Earls Court & West Kensington Opportunity Area)	700	700	1,400	1,200	800	3,400	5,000 -6,000
South Fulham Riverside	800	800	1,600	400	200	2,200	300 -500
Rest of the borough	1,000	200	1,200	0	0	1,200	
Total	4,200	3,600	7,800	3,300	3,300	14,400	25,300 -27,500
Average/year	840	720	780	660	640	720	
Maximum for infrastructure planning purposes			9,000			20,000	

Figure 2.5: Growth identified in the Core Strategy²⁹

- 2.2.8 The **Development Management Local Plan (DM LP)** and **Planning Guidance Supplementary Planning Document (PG SPD)** provide further policies and guidance which elaborate upon the strategic policies of the Core Strategy.
- 2.2.9 As part of the evidence base for CIL, the council must provide information on the “delivery of other targets” (in addition to information on the delivery of affordable housing targets – see section 4.2)³⁰. The **Monitoring Report** provides such information based on the implementation of the policies within the Core Strategy over the period from April 2012 to March 2013.
- 2.2.10 Amongst other monitoring indicators, the Monitoring Report provides information on the council’s delivery of housing targets as summarised in Figure 2.6. Whilst the council has not met its housing target in the monitoring year, there are 12,780 additional dwellings in the housing trajectory for the plan period 2011/12 to 2031/32. It is also worth noting that approvals in the Earls Court & West

²⁹ Adapted from Core Strategy Strategic Policy A ‘Regeneration Areas and Indicative Additional Homes and Jobs’ table (p.30) and Borough Wide Strategic Policy H1 ‘Indicative Housing Targets’ (p.96)

³⁰ NPPG018

Kensington Opportunity Area would represent a substantial increase on the quantum in Figure 2.5.

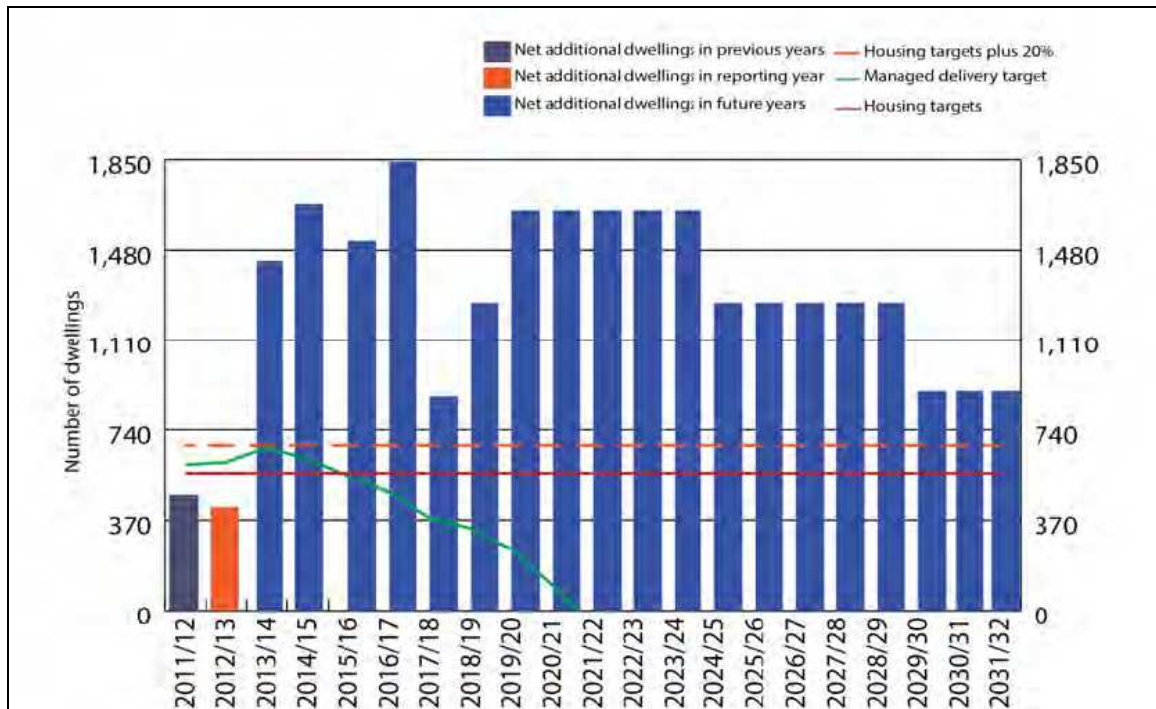


Figure 2.6: Housing Trajectory³¹

- 2.2.11 The council is intending to carry out and consult on a **Local Plan Review** which is expected to propose some policies to replace those in the existing adopted Core Strategy and Development Management Local Plan (DM LP). ‘Issues and Options for Review’ were published for consultation from July to September 2013³². The timetable for this review will be published shortly.
- 2.2.12 However, as set out in paragraph 2.1.5, for the purpose of this Draft Charging Schedule, the “**relevant plan**”³³ has to be the Mayor of London’s adopted London Plan (as altered) and the council’s adopted Core Strategy (2011) and Development Management Local Plan (DM LP, 2013).
- 2.2.13 The Regeneration and Opportunity Areas identified in the Core Strategy are particularly important in terms of the evidence base for infrastructure and viability for the council’s ‘strategic sites’.
- 2.2.14 The appropriate available evidence is summarised in the below sections for each respective area. This includes adopted Supplementary Planning Documents (SPDs), Opportunity Area Planning Frameworks (OAPFs) and supporting evidence base documents called Development Infrastructure Funding Studies (DIFS) which also contain relevant infrastructure and viability evidence.

³¹ LBHF (July 2014) Monitoring Report April 2012 to March 2013: Figure 3

³² LBHF (July 2013) Issues and Options for Review

³³ NPPG011

Park Royal

Publisher	Date	Document
LBHF; LB Ealing; LB Brent; Mayor of London	Jan 2011	Park Royal Opportunity Area Planning Framework
	Jun 2013	Old Oak: A Vision for the Future

Figure 2.7: Park Royal documents

2.2.15 The Core Strategy sets out the Strategic Policy for Park Royal in line with the housing and jobs targets summarised in Figure 2.5 as well as outlining policy for sites at Old Oak Common Sidings (PR1) and North Pole Depot (PR2).

2.2.16 The **Park Royal OAPF** sets out a framework for maximising employment opportunities, connectivity, transport, housing and public realm developments in the area. Chapter 9 promotes a standard charge approach for pooling infrastructure contributions in the area although this has not been implemented.

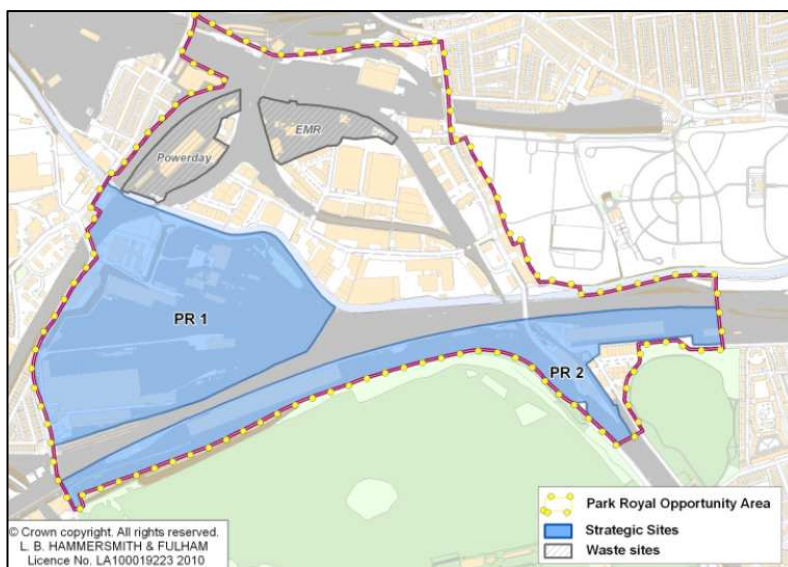


Figure 2.8: Park Royal Core Strategy

2.2.17 The **Old Oak Vision** consultation set out a vision of how 19,000 new homes and 90,000 new jobs over an area of 10km² could be delivered in the area in light of planned new Crossrail and High Speed Rail 2 (HS2) stations. The Vision introduces the possible transport and social infrastructure which could be required as part of the proposed development in the area. It should be noted that the vision and its proposals are not part of the ‘relevant plan’ for CIL charge-setting purposes.

2.2.18 A DIFS is being commissioned by the Mayor and the relevant boroughs to consider infrastructure and viability evidence to support a revised policy context for the area, although this is not expected to become available until late 2014. The Mayor is consulting on establishing a Mayoral Development Corporation (MDC). An MDC, if agreed would have plan-making, CIL charge-setting and decision-taking powers.

White City

Publisher	Date	Document
AECOM; Deloitte	May 2013	Development Infrastructure Funding Study
LBHF; Mayor of London	Oct 2013	White City Opportunity Area Planning Framework

Figure 2.9: White City documents

2.2.19 The Core Strategy sets out the Strategic Policy for White City Opportunity Area in line with the housing and jobs targets summarised in Figure 2.5 as well as outlining policy for sites at White City East (WCOA1); QPR Football Ground and TA Centre (WCOA2); Shepherds Bush Market (WCOA3).

2.2.20 The **White City OAPF** sets out a vision for a vibrant and creative place with a stimulating and high quality environment where people will want to live, work, shop and spend their leisure time. The OAPF sets out the range of infrastructure necessary to support development in the area, and Chapter 7 sets out a Delivery and Implementation Strategy.

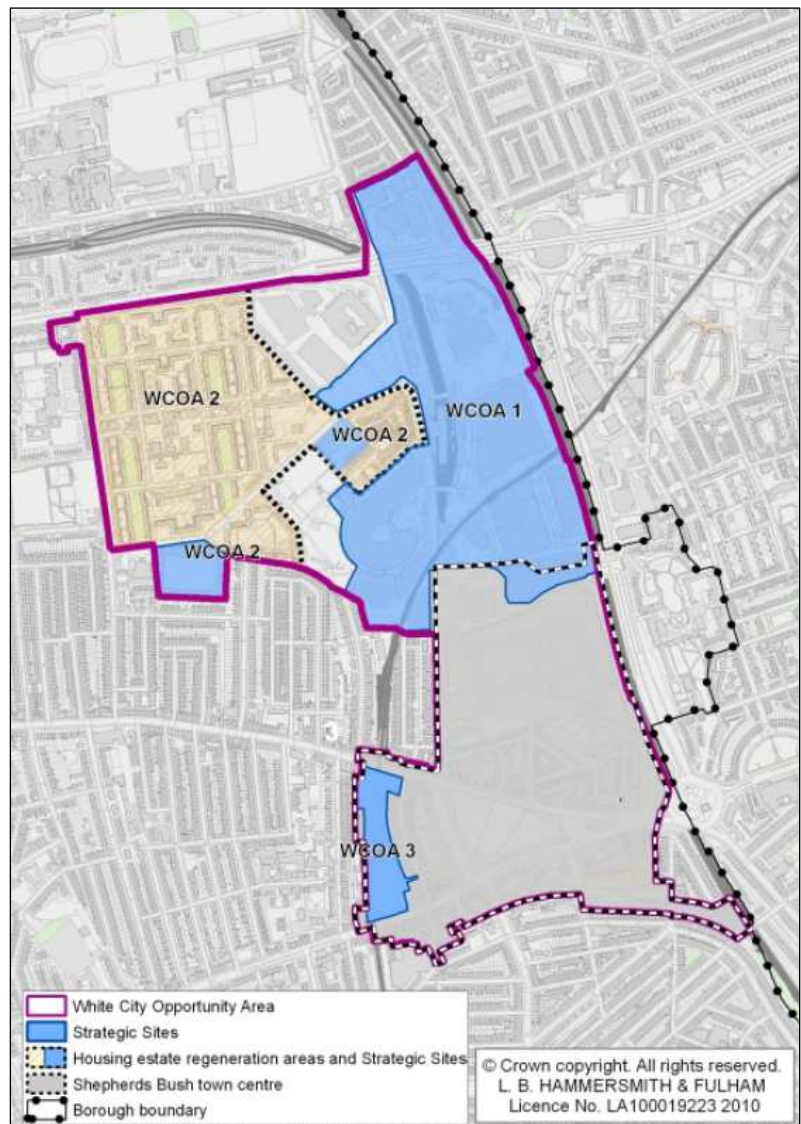


Figure 2.10: Core Strategy Strategic Policy WCOA Map

2.2.21 The OAPF is supported by a **DIFS** which provides further infrastructure and viability evidence and suggests a policy approach of continuing to seek S106s to deliver infrastructure in the area. This is discussed further in terms of viability in section 4.2 with a particular focus on White City East (WCOA1), where the majority of new development is planned to come forward.

Hammersmith Town Centre & Riverside

2.2.22 The Core Strategy sets out the Strategic Policy for Hammersmith Town Centre and Riverside in line with the housing and jobs targets summarised in Figure 2.5 as well as outlining policy for sites at Town Hall and Adjacent Land (HTC1); Kings Mall and Ashcroft Square Estate (HTC2); and Hammersmith Embankment (HTC3).

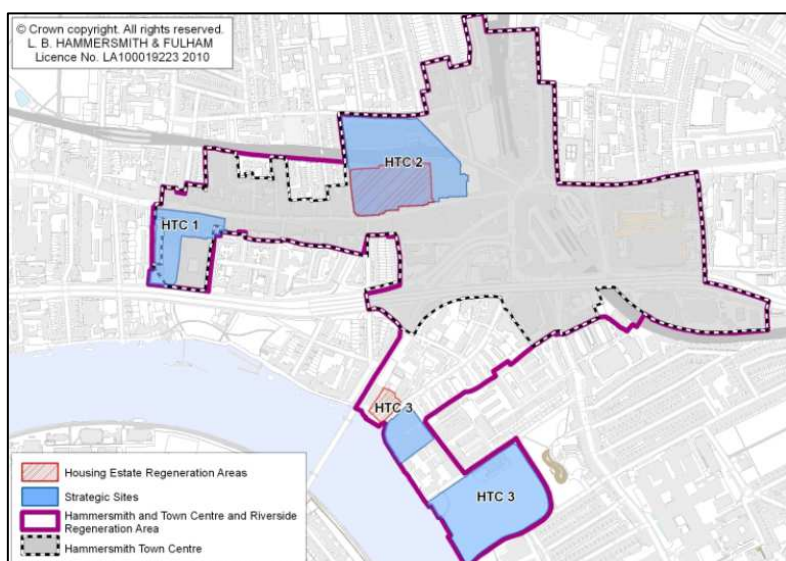


Figure 2.11: Core Strategy Strategic Policy HTC Map

2.2.23 Other than the Core Strategy policies, there is no specific local planning and infrastructure activity such as a SPD or DIFS available for this area at present. Development and infrastructure provision is largely being tested through individual planning applications and their supporting evidence base documents. However, related to the Local Plan Review, the council is considering preparing further policies and possibly a SPD for the town centre and emerging proposals for the replacement of the A4 Hammersmith Flyover.

Earls Court & West Kensington

Publisher	Date	Document
DVS	Nov 2011	Viability Study: Development Infrastructure Study
LBHF; RBKC; Mayor of London	Mar 2012	Earls Court & West Kensington Opportunity Area Joint Supplementary Planning Document

Figure 2.12: Earls Court & West Kensington documents

2.2.24 The Core Strategy sets out the Strategic Policy for Fulham Regeneration Area in line with the housing and jobs targets summarised in Figure 2.5 as well as outlining policy for sites at Earls Court Exhibition Centre 2 and Seagrave Road car park, Lillie Bridge Depot (FRA1) and North End Road/Lillie Road/Chuter Ede House/Coomer Place car park strategic site (FRA2).

2.2.25 The **Earls Court & West Kensington OAPF/SPD** sets out a vision for residential-led regeneration. It includes chapters on Social and Community Facilities, Transport and Accessibility, Energy, Environmental and Phasing and S106 strategies, articulating the infrastructure needed in the area.

2.2.26 The OAPF/SPD is supported by a **DIFS** which provides further viability evidence.

2.2.27 Developments that have already been approved in the area have made considerable S106 contributions towards identified infrastructure need. This is discussed further in terms of viability in section 4.2.

2.2.28 It should also be noted that the Opportunity Area is partly within the Royal Borough of Kensington and Chelsea and the two boroughs have worked closely together on planning and CIL matters.

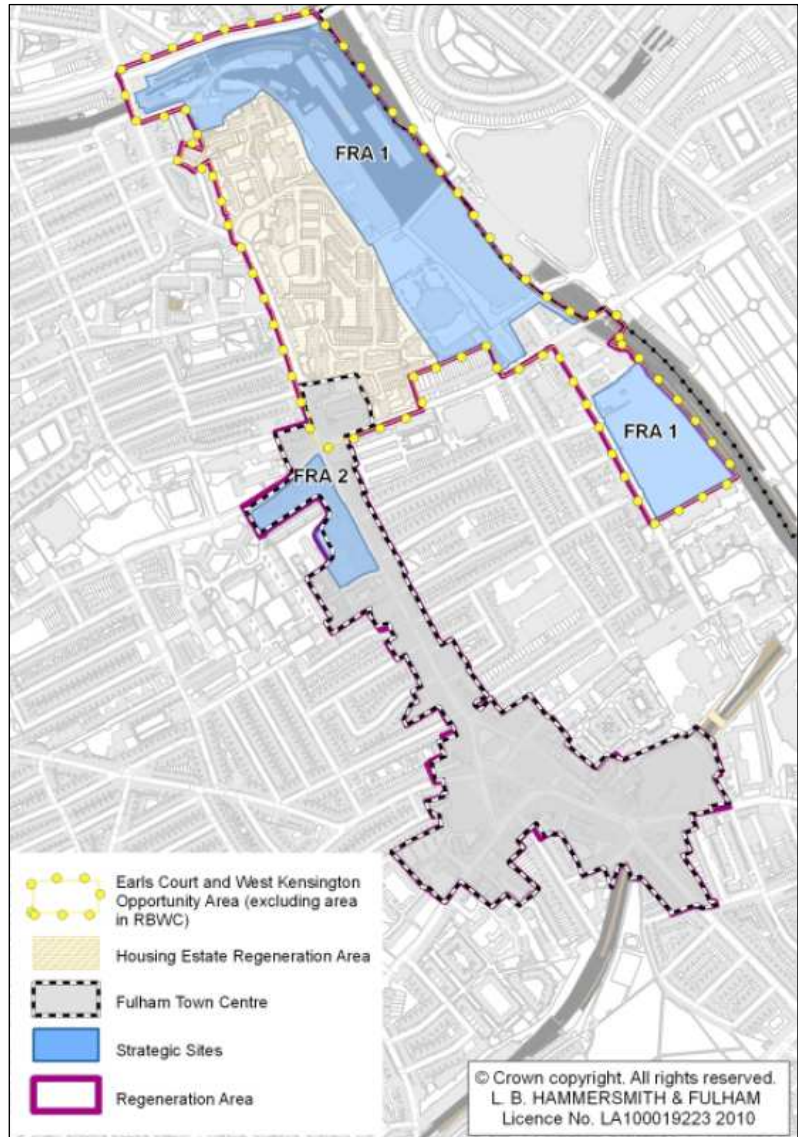


Figure 2.13: Core Strategy Strategic Policy FRA Map (including Earls Court & West Kensington Opportunity Area)

South Fulham Riverside

Publisher	Date	Document
CgMs; Cushman & Wakefield; Jacobs	Mar 2012	Delivery and Infrastructure Funding Study
LBHF	Jan 2013	South Fulham Riverside Supplementary Planning Document

Figure 2.14: South Fulham Riverside documents

2.2.29 The Core Strategy sets out the Strategic Policy for South Fulham Riverside in line with the housing and jobs targets summarised in Figure 2.5.

2.2.30 The **South Fulham Riverside SPD** sets out a vision for the area moving away from its industrial past and becoming a new residential mixed use area integrated with employment, community and leisure uses that adopt a waterfront character. The area will have a riverside focus that embraces the river offering leisure, recreational and sporting facilities linked to the river. It includes chapters on Transport Interventions, Social Infrastructure, Environmental Strategy and a Delivery and Implementation

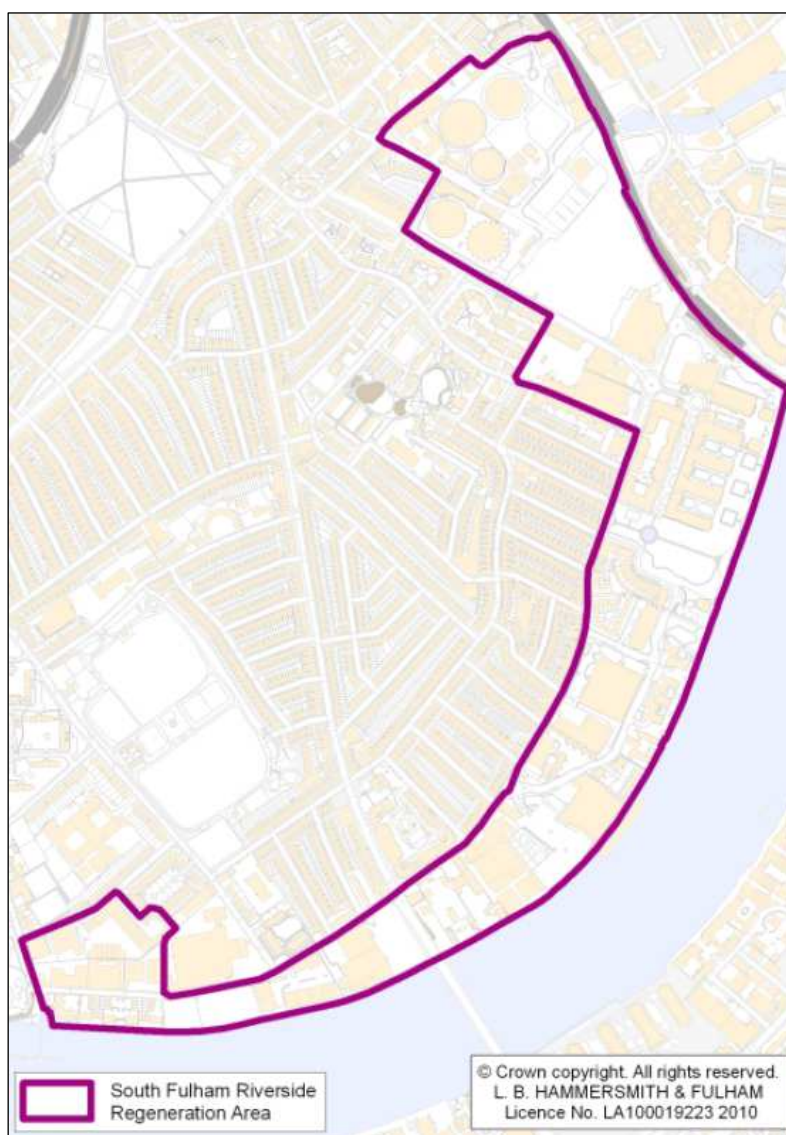


Figure 2.15: Core Strategy Strategic Policy SFR Map

Strategy, articulating the infrastructure needed in the area.

2.2.31 The SPD is supported by a **DIFS** which provides further infrastructure and viability evidence. This is discussed further in terms of viability in section 4.2.

3. Infrastructure

3.1 Legislative & policy context

3.1.1 The legislation, regulations, policy and guidance for infrastructure planning are summarised in the following sections.

National

3.1.2 The overall purpose of CIL is to “ensure that the costs incurred in **supporting the development of an area** can be funded (wholly or partly) by owners or developers of land”³⁴. CIL should primarily be applied to “funding the **provision, improvement, replacement, operation or maintenance of infrastructure**”³⁵, however, a proportion of CIL – ‘Neighbourhood CIL’ – may also be applied to “anything else that is concerned with addressing the demands that development places on an area”³⁶ (see section 3.3).

3.1.3 The focus should be on “**new infrastructure** and should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by new development”, meaning that CIL “can be used to **increase the capacity of existing infrastructure or to repair failing existing infrastructure**”³⁷.

3.1.4 The council, in developing its CIL Charging Schedule, must “think strategically in [its] use of the levy to ensure that key infrastructure priorities are delivered to **facilitate growth and the economic benefit of the wider area**”³⁸.

3.1.5 These requirements for CIL charge-setting should also be considered in light of more general planning requirements for councils to use the planning system to contribute to “building a strong, responsive and competitive economy... including the provision of infrastructure”³⁹. In addition, the council’s planning policies “should recognise and seek to address potential barriers to investment, including... any lack of infrastructure”⁴⁰ and, in doing so, Local Plans “should aim to meet the **objectively assessed... infrastructure needs** of the area”⁴¹.

Regional

3.1.6 The **London Plan** is the overall strategic plan for London. The London Plan states that it will use both S106 ‘planning obligations’ (Policy 8.2) and CIL (Policy 8.3) to help deliver its policies.

³⁴ Planning Act 2008 S205(2); see also NPPG071

³⁵ Planning Act 2008 S216(1)-(2); R59

³⁶ Planning Act 2008 S216A-B; R59A-59F; see also NPPG072

³⁷ NPPG071

³⁸ NPPG011

³⁹ NPPF para.7

⁴⁰ NPPF para.21 see also para.160

⁴¹ NPPG Local Plans para.2

3.1.7 The **Crossrail SPG** introduces how the “Mayor is considering ways of improving infrastructure planning in London” and “is keen to work with boroughs and other stakeholders... to ensure that strategically important infrastructure is identified, funded and implemented effectively”⁴². This is elaborated further in the expanded policy text for London Plan Policy 8.1 ‘Implementation’ as part of the **Further Alterations to the London Plan**.

3.1.8 The **Long Term Infrastructure Investment Plan for London: Progress Report** outlines the steps the Mayor will undertake to publish a Long Term Infrastructure Investment Plan for London by Autumn 2014 to consider infrastructure planning for the city towards 2050.

Local

3.1.9 The **Core Strategy** states that it will use both S106s and CIL to help deliver its policies, which includes delivering infrastructure:

The council will implement the policies and proposals of the Core Strategy and seek to ensure that the necessary infrastructure is secured to support regeneration by:

- ...
- undertaking pre-application discussions with developers and involving partner organisations where appropriate, and through development management powers, including negotiating S106 obligations;
- ...
- developing a charging schedule in response to CIL regulations or successor regimes that support the implementation of infrastructure projects necessary to deliver the Core Strategy...⁴³

3.1.10 Chapter 10 of the Core Strategy introduces the **Infrastructure Schedule** which lists the priority physical, social and green infrastructure schemes required to support development in the borough. This schedule is evidenced by an **Infrastructure Study Update** (April 2011) which sets out existing infrastructure provision and capacity across the borough and future infrastructure requirements and deficits. This infrastructure evidence base has since been updated to support the CIL Preliminary Draft Charging Schedule (PDCS) and Draft Charging Schedule (DCS) (see section 6.1).

3.1.11 As set out in section 2.2, there is also a range of **DIFS** and **SPDs** for some of the Regeneration & Opportunity Areas which provide context and evidence for infrastructure planning in the borough. These help inform the updated Infrastructure Schedule.

⁴² Crossrail SPG paras.4.28-4.29

⁴³ Core Strategy: Delivery and Monitoring (emphasis added)

3.2 Methodology & approach

- 3.2.1 In assessing the objectively assessed infrastructure needs to support planned development across the borough, the starting point is to consider the context set out in sections 2.2 and 3.1 and, in particular, to draw on infrastructure evidence “from the infrastructure assessment that was undertaken as part of preparing the relevant Plan”⁴⁴.
- 3.2.2 However, the council “may undertake additional infrastructure planning to identify its infrastructure funding gap, if it considers that the infrastructure planning underpinning its relevant Plan... does not reflect its latest priorities”⁴⁵.
- 3.2.3 The Infrastructure Schedule for the Core Strategy acknowledged a number of ‘unknowns’ relating to the “Additional need from Regeneration Areas” and, as set out in section 2.2, a significant amount of evidence has since been developed (and tested through public consultation) for the Regeneration and Opportunity Areas through **DIFS** and **SPDs**. It is therefore appropriate that the council’s evidence base on infrastructure planning is updated to support the Draft Charging Schedule, in terms of helping to demonstrate the funding gap.
- 3.2.4 The council’s approach to the infrastructure evidence base is as follows, for which each stage is detailed in the following sections:
1. Consider **population growth forecasts** across the borough;
 2. Decide on **infrastructure categories** and consider relevant existing and emerging **strategies** relating to those different types of infrastructure;
 3. Draft an **Infrastructure Schedule** of infrastructure schemes needed to support development in the borough;
 4. Consider other proposed local mechanisms for addressing infrastructure needs arising from new development, namely **S106s and their interface with CIL** through a **Draft Regulation 123 (‘R123’) List**;
 5. Estimate an **infrastructure funding gap** which CIL could help reduce to support development in the borough; and
 6. Estimate **CIL income** and the extent to which this could address the infrastructure funding gap.

Population growth forecasts

- 3.2.5 The significant housing growth planned in the Core Strategy and the borough’s Regeneration Areas (section 2.2) will generate significant population growth, which will in turn place extra demands on existing infrastructure and require new infrastructure to support development.

⁴⁴ NPPG016; see also NPPG009

⁴⁵ NPPG017

3.2.6 Population and household projections for the borough are summarised in Figures 3.1 and 3.2.

3.2.7 Figures 3.3 – 3.6 show the GLA 2013 Round Demographic Projections at a ward level and are based on work related to the Strategic Housing Land Availability Assessment (SHLAA) which outlines expected housing delivery across the borough. This helps provide an indication of expected population growth based on where new residential development is planned to be built in the borough.

3.2.8 As would be expected, the figures show that those wards which demonstrate the greatest population growth are those wards which include the Regeneration Areas.

3.2.9 This evidence helps ensure that infrastructure needs are focused in the areas of future development and its related population growth.

Source	2011	Change	2031
© GLA 2013 Round Demographic Projections, 2014	182,786	+37,711 (+21%)	220,497

Figure 3.1: Population and household projections

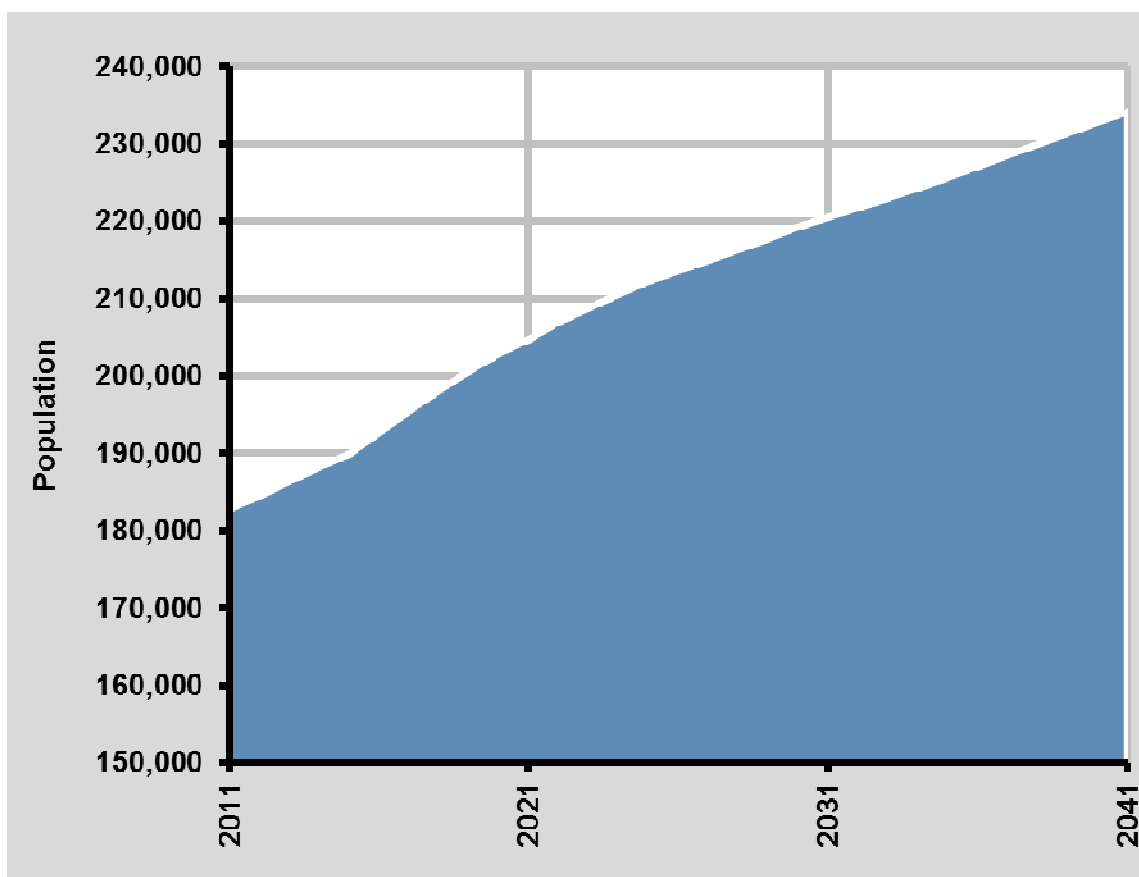


Figure 3.2 Population projections based on © GLA 2014

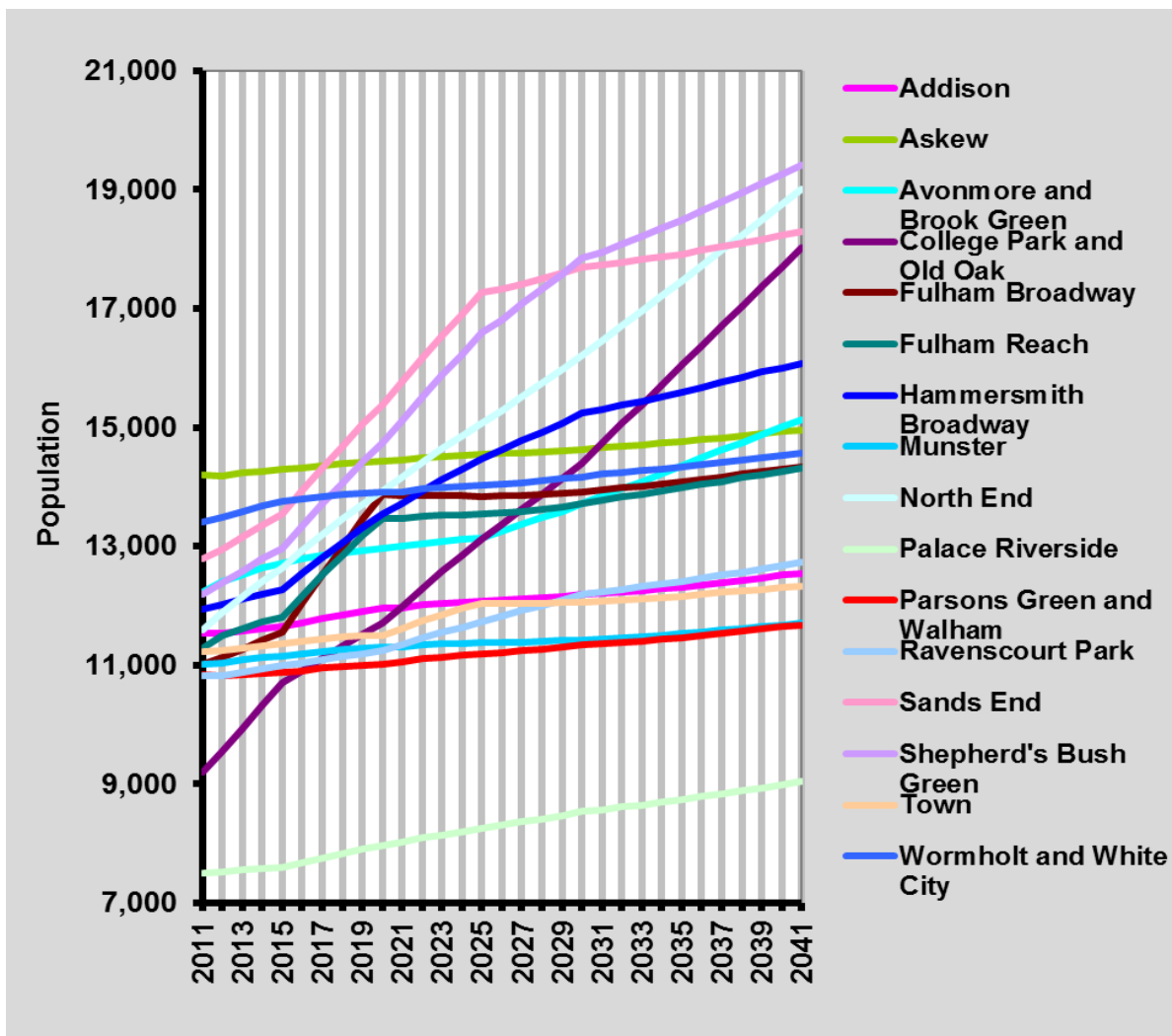


Figure 3.3 Absolute population change by ward 2011-2031 based on © GLA 2014

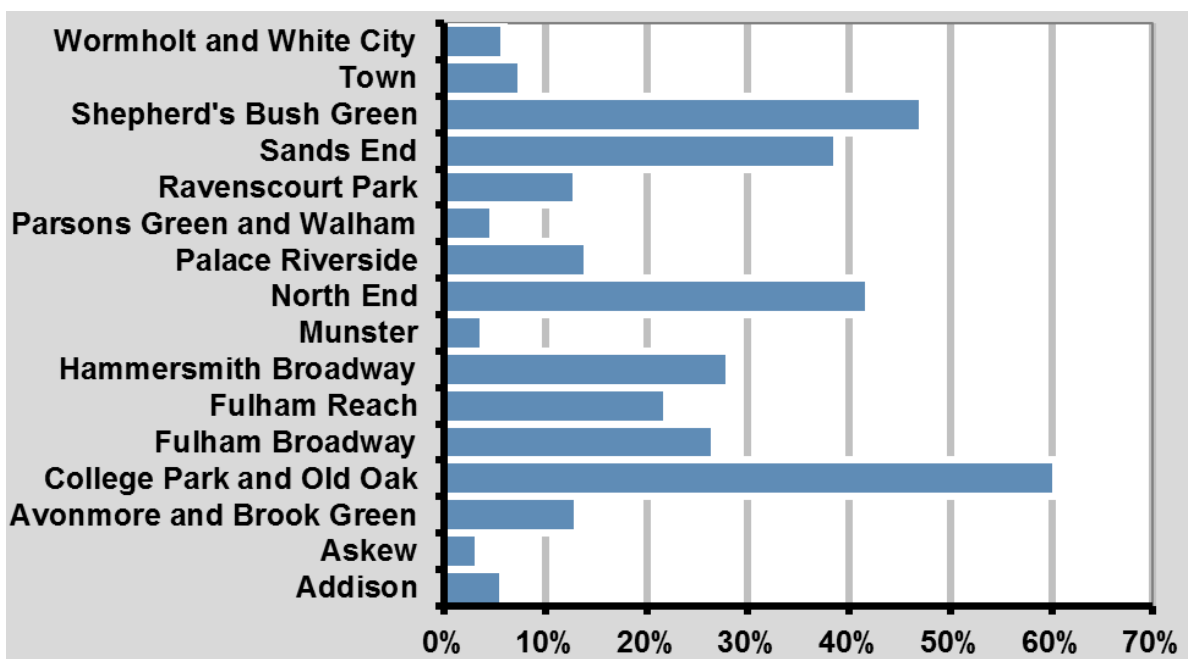


Figure 3.4 % population change by ward 2011-2031 based on © GLA 2014

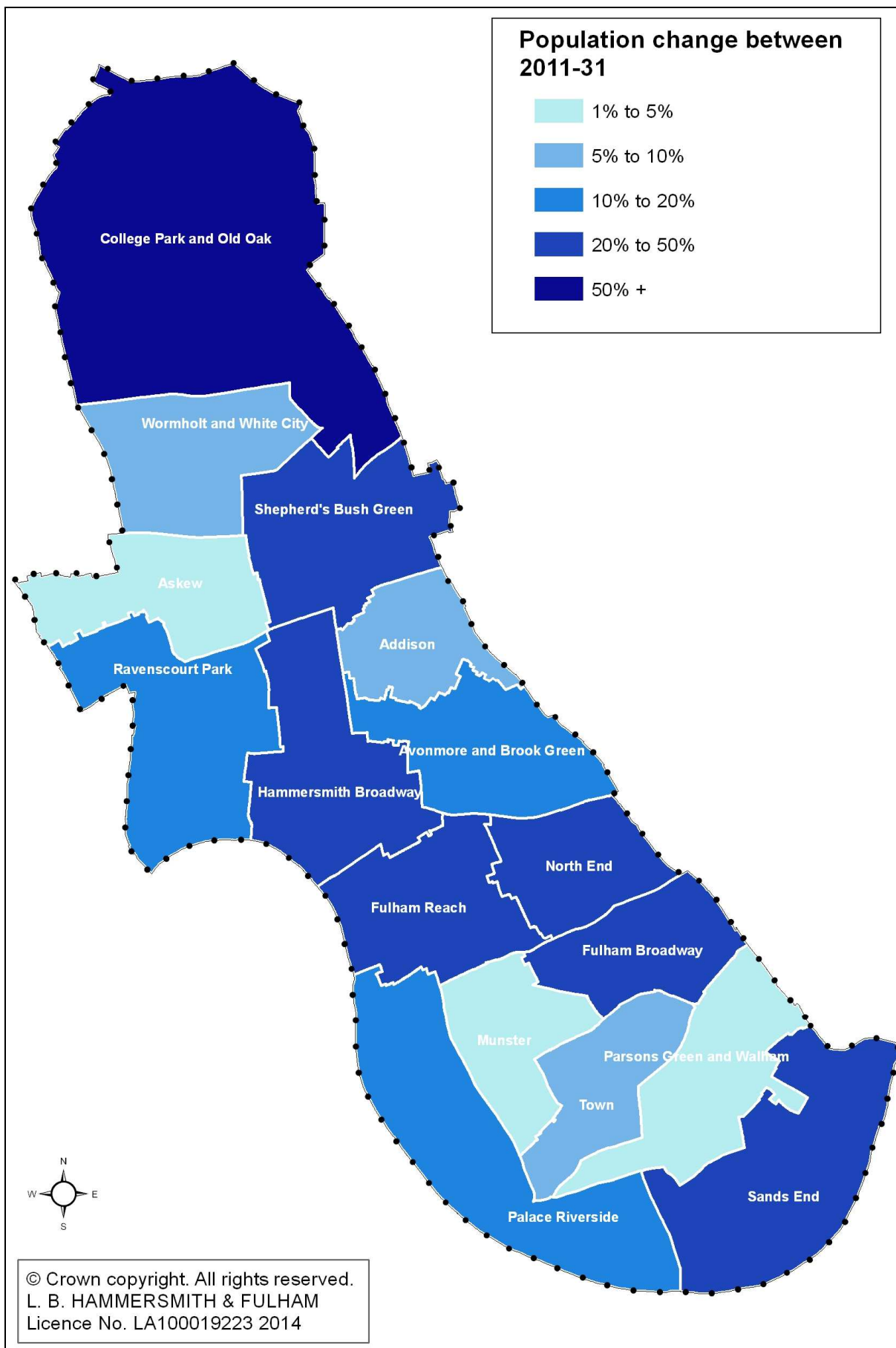


Figure 3.5 % population change by ward 2011-2031 based on © GLA 2014

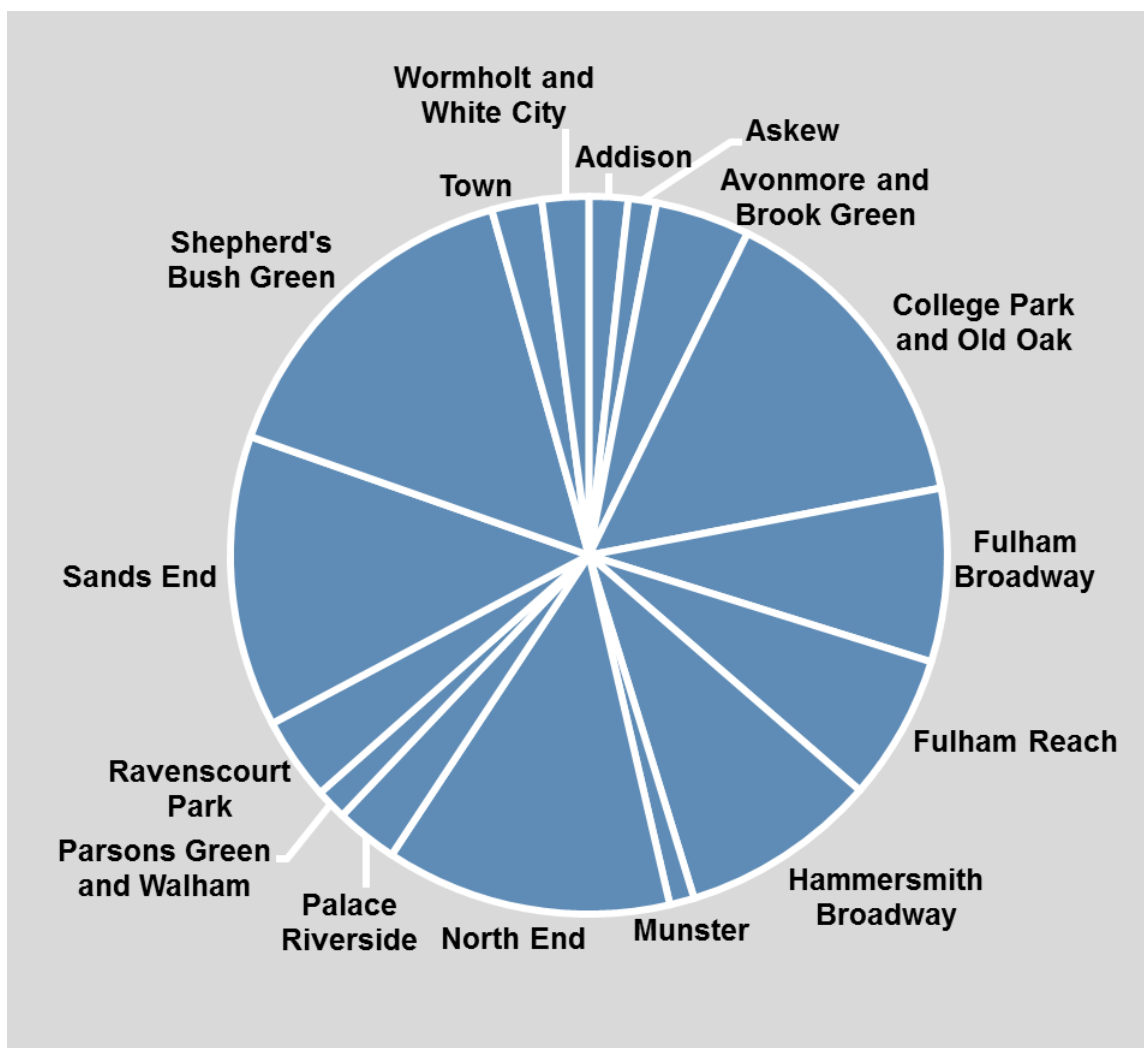


Figure 3.6 Population change by ward as % of borough population change 2011-2031 © GLA 2014

Infrastructure categories & relevant strategies

- 3.2.10 The council is basing its infrastructure planning evidence on the ‘categories’ of infrastructure set out in Figure 3.7 which are largely based around the council’s current departments to assist with delivery.
- 3.2.11 The NPPF sets out a core planning principle that planning should “**take account of and support local** strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs”⁴⁶. The relevant strategies relating to each category of infrastructure are set out in Appendix 2 to provide further justification and references.

⁴⁶ NPPF para.17

Infrastructure Category	Sub-Categories
Adult Social Care (ASC)	Adult Social Care
	Health
Children’s Services (CS)	Early Years
	Schools
	Youth
Environment, Leisure & Residents’ Services (ELRS)	Culture
	Community Safety
	Emergency Services
	Leisure
	Parks
	Waste & Street Enforcement
Finance & Corporate Governance (FCG)	Community Investment
Housing & Regeneration (HR)	Housing & Regeneration
	Economic Development, Adult Learning & Skills
Libraries & Archives (LA)	Libraries & Archives
Transport & Technical Services (TTS)	Energy
	Environmental Health
	Drainage & Flooding
	Highways
	Transport

Figure 3.7 Infrastructure Categories

Infrastructure Schedule

3.2.12 The council is required to identify:

- Additional **infrastructure needed** in the area to support development;
- What **other sources of funding** (other than CIL) are available for that infrastructure; and
- The **total cost of the additional infrastructure needed** that the council wishes to fund wholly or partly through CIL⁴⁷.

3.2.13 It is recognised that “there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term” so the council has focused

⁴⁷ NPPG017; see also NPPG016; NPPG Local Plans para.18

“on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy”⁴⁸.

3.2.14 The council has produced an updated version of the **Infrastructure Schedule** (Appendix 3) as part of the evidence base to support the Draft Charging Schedule drawing on a number of sources of information:

- **Previous iterations** of the Infrastructure Schedule (section 3.1), including representations on the Preliminary Draft Charging Schedule (PDCS) version (section 6.2);
- The **local context** and **DIFS** and **SPDs** for some of the Regeneration & Opportunity Areas (sections 2.2 and 3.1);
- **Informal consultation** with council departments and infrastructure providers;
- **Planning Applications Committee (PAC) reports**; and
- Draft or signed **S106s**.

3.2.15 The columns used in the Infrastructure Schedule are explained below:

- **Ref** – Reference code, based on Infrastructure Category (Figure 3.7).
- **Sub-Category** – Infrastructure Sub-Category (Figure 3.7).
- **Scheme** – Name of the infrastructure scheme.
- **Description** – Description of the infrastructure scheme.
- **Core Strategy** – Reference to the row number of the Core Strategy Infrastructure Schedule. Some schemes are “New”, however, it should be noted that the Core Strategy Infrastructure Schedule acknowledged a number of ‘unknowns’ relating to the “Additional need from Regeneration Areas” as set out in section 3.2, so such schemes were not entirely unanticipated.
- **CIL PDCS** – Reference number of the scheme from the previous consultation as part of the CIL PDCS Infrastructure Schedule.
- **WC / SFR DIFS** – Reference number of the scheme from either the White City (WC) or South Fulham Riverside (SF) DIFS (section 2.2).
- **Regen. Area** – The Regeneration Area which the scheme mostly supports development within, based on the policy context set out in section 2.2.
- **Other Agencies / Funding Sources** – Other possible delivery partners and/or funding sources for the scheme, other than developers.
- **First Year £ Needed** – The estimated first year in which monies are needed for the scheme.

⁴⁸ NPPG016

- **Year Complete** – The estimated year in which the scheme is expected or required to be complete.
- **Costs:**
 - **Capital** – The estimated capital (one-off) costs of the scheme.
 - **Revenue / Year** – The estimated revenue (yearly) costs of the scheme.
 - **Years** – The estimated years in which any revenue costs are required for: usually assumed for a fixed time period rather than infinitely to avoid over-estimated the funding gap.
 - **Total** – The total costs of the scheme from the above estimates. It should be noted that “£0” cost may mean that costs are unknown at present.
- **Assumed / Committed Funding**
 - **Council / Gov’t / Agencies / Other** – Estimated assumed or committed funding from the council, the government or other delivery partners for the scheme.
 - **S106** – Known S106 monies assumed or committed to the scheme.
 - **Total** – The total funding of the scheme from the above estimates.
- **Funding Gap** – The gap between the total costs and assumed or committed funding for the scheme, i.e. how much remains to be funded.
- **Proposed Mechanism**
 - **Site** – The council provisionally proposes that the scheme should be provided on-site or in-kind as part of the design and delivery of development sites.
 - **S106** – The council provisionally proposes to fund the scheme through S106 receipts (see following section on S106s & interface with CIL)
 - **R123 CIL** – The council provisionally proposes to fund the scheme through CIL receipts and this is reflected in the Draft R123 List.
 - **Future CIL** – The council provisionally proposes to fund the scheme through ‘future’ CIL receipts, although these projects are currently excluded from the Draft R123 List and the total infrastructure costs calculations because:
 - § the projects are longer-term with less accurate information on costs and funding available;

- § they are not necessarily required to support the current Relevant Plan (largely related to emerging proposals at Park Royal – see section 2.2); and/or
- § their costs are exceptionally high and could possibly unhelpfully exaggerate the overall costs reflected in the Infrastructure Schedule.

S106s

- 3.2.16 It is important to note the legislation and policy context specifically regarding S106s as an important part of delivering infrastructure.
- 3.2.17 S106 agreements are planning obligations or undertakings which can be agreed between a landowner and council relating to a planning permission and are normally used where planning conditions cannot adequately control the development and/or to secure the provision of necessary infrastructure.
- 3.2.18 S106 of the **Town and Country Planning Act 1990** states that:

Any person interested in land in the area of a local planning authority may, by agreement or otherwise, enter into an obligation...

- (a) restricting the development or use of land in any specified way;
- (b) requiring specified operations or activities to be carried out in, on, under or over the land;
- (c) requiring the land to be used in any specified way; or
- (d) requiring a sum or sums to be paid to the authority on a specified date or dates periodically.⁴⁹

- 3.2.19 The **CIL Regulations** put the S106 ‘tests’ into statute (which are replicated exactly in the NPPF, the NPPG on Planning Obligations and the NPPG on CIL) which state that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development⁵⁰

- 3.2.20 The **NPPG on Planning Obligations** further clarifies that planning obligations are intended to “mitigate the impact of unacceptable development to make it acceptable in planning terms”⁵¹.

⁴⁹ Town and Country Planning Act 1990 S106, as amended by S12 of the Planning and Compensation Act 1991

⁵⁰ R122(2); NPPF para.204; NPPG Planning Obligations para.1; NPPG094

S106s & interface with CIL

- 3.2.21 There is a general expectation that when CIL is introduced, **S106s “should be scaled back** to those matters that are directly related to a specific site, and are not set out in a R123 list”⁵². However, “the Government considers there is **still a legitimate role for development-specific planning obligations** to enable a local planning authority to be confident that the specific consequences of a particular development can be mitigated”⁵³.
- 3.2.22 When the borough CIL is introduced (or nationally from April 2015), **limitations on pooling contributions from S106s** will come into effect, meaning that “no more may be collected in respect of a specific infrastructure project or a type of infrastructure through a S106 agreement, if five or more obligations for that project or type of infrastructure have been entered into since 6th April 2010, and it is a type of infrastructure that is capable of being funded by the levy”⁵⁴. (Infrastructure that is capable of being funded by CIL is defined by the Planning Act 2008 in terms of physical facilities so does not encompass some social and employment purposes that are often the subject of S106s).
- 3.2.23 The council must ensure there is **clarity** “about the [council’s] infrastructure needs and what developers will be expected to pay for through which route [CIL or S106]. There should be no actual or perceived ‘double dipping’ with developers paying twice for the same item of infrastructure”⁵⁵. Policies for seeking S106s should be set out in a Local Plan document⁵⁶ and, for transparency, the council will “set out at examination how [its] S106 policies will be varied”⁵⁷ alongside its Draft R123 List (Appendix 4).

Draft Regulation 123 (‘R123’) List

- 3.2.24 To assist with providing clarity about S106s and the interface with CIL, Regulation 123 (‘R123’) of the CIL Regulations allows the council, upon adoption of the CIL, “to set out a list of those projects or types of **infrastructure that it intends to fund, or may fund, through the levy**”⁵⁸. This list does not need to include items which may be the subject of funding from Neighbourhood CIL (section 3.3).
- 3.2.25 As part of the “appropriate evidence to inform the preparation of [the] charging schedule”⁵⁹, the council must set out a **draft of the R123 List** and “any known site-specific matters for which S106 contributions may continue to be sought”. The purpose of the list is to “help provide evidence on the potential funding gap –

⁵¹ NPPG Planning Obligations para.1

⁵² NPPG097

⁵³ NPPG094

⁵⁴ NPPG099; see R123

⁵⁵ NPPG095; see also NPPG Planning Obligations para.2

⁵⁶ NPPG Planning Obligations para.3

⁵⁷ NPPG097

⁵⁸ NPPG096; see also Planning Act 2008 S216(5); R123

⁵⁹ R14(5); see also Crossrail SPG paras.6.12, 6.14

it is not the purpose of the examination to challenge the list⁶⁰. The Draft R123 List is set out in Appendix 4.

Infrastructure funding gap

3.2.26 The Infrastructure Schedule (Appendix 3) shows a total infrastructure funding gap of approximately **£1.9 billion**, however, this reduces to approximately **£481 million** when 'Future CIL' schemes (see section on Infrastructure Schedule above for an explanation of this) are excluded as summarised in Figures 3.8 and 3.9 (presented by Infrastructure Category and Regeneration Area respectively).

Infrastructure Category	Costs	Assumed / Committed Funding	Funding Gap	Funding Gap less 'Future CIL' schemes
Adult Social Care (ASC)	£32m	£21m	£11m	£11m
Children's Services (CS)	£136m	£104m	£32m	£32m
Environment, Leisure & Residents' Services (ELRS)	£127m	£60m	£67m	£66m
Finance & Corporate Governance (FCG) (Community Investment)	£29m	£28m	£1m	£1m
Housing & Regeneration (HR)	£41m	£10m	£31m	£31m
Libraries & Archives (LA)	£5m	£4m	£1m	£1m
Transport & Technical Services (TTS)	£4,150m	£2,435m	£1,715m	£338m
Total	£4,520m	£2,662m	£1,859m	£481m

Figure 3.8 Total infrastructure funding gap by Infrastructure Category (figures rounded)

Regeneration Area	Costs	Assumed / Committed Funding	Funding Gap	Funding Gap less 'Future CIL' schemes
London-wide	£2,000m	£1,000m	£1,000m	£0m
Borough-wide	£1,587m	£1,289m	£298m	£298m
Park Royal	£238m	£110m	£128m	£0m*
White City	£151m	£64m	£86m	£86m
Hammersmith	£334m	£36m	£299m	£49m
Earls Court	£120m	£102m	£17m	£17m
South Fulham	£90m	£60m	£31m	£31m
Total	£4,520m	£2,662m	£1,859m	£481m

Figure 3.9 Total infrastructure funding gap by Regeneration Area (figures rounded). *Due to 'relevant plan' see section on Infrastructure Schedule above

⁶⁰ NPPG017

3.2.27 When the total infrastructure funding gap (less ‘Future CIL’ schemes) figure of **£481 million** is then considered in light of whether the council provisionally proposes to fund the scheme through CIL or S106 receipts as its ‘Proposed Mechanism’ (see section on Infrastructure Schedule above for an explanation of this), the funding gap is approximately **£379 million for CIL** and £92 million for S106 (the remainder is through ‘Site’ delivery), as set out in Figure 3.10.

Infrastructure Category	Funding Gap less ‘Future CIL’ schemes			
	‘R123 CIL’ Schemes	%	‘S106’ Schemes	%
Adult Social Care (ASC)	£6m	1.6%	£5m	5.9%
Children’s Services (CS)	£25m	7.3%	£7m	7.4%
Environment, Leisure & Residents’ Services (ELRS)	£52m	15.0%	£15m	15.9%
Finance & Corporate Governance (FCG) (Community Investment)	£0m	0.0%	£0.3m	0.4%
Housing & Regeneration (HR)	£0.1m	0.0%	£31m	34.0%
Libraries & Archives (LA)	£1m	0.4%	£0m	0.0%
Transport & Technical Services (TTS)	£261m	75.7%	£34m	36.6%
Total	£344m	100.0%	£92m	100.0%

Figure 3.10 Total infrastructure funding gap by Infrastructure Category and ‘Proposed Mechanisms’ (CIL or S106) (figures rounded)

3.2.28 **It is important to note a number of considerations when considering figures used in the Infrastructure Schedule and any summation of these:**

- **The Schedule and figures have been drafted primarily for the purpose of providing an evidence base for CIL;**
- **The Schedule neither represents formal council departmental budgets, a detailed spending plan for the council nor any kind of indication about the proportion of possible CIL expenditure on different Infrastructure Categories or Regeneration Areas;**
- **The figures provided are, in most cases, estimates and are likely to be revised over time;**
- **The schemes listed may not be fully comprehensive and are not in any order of priority;**
- **Total S106 figures do not represent future S106 expectations (i.e. assumptions on S106s in section 4.2) because many listed in the Schedule are already committed or ‘assumed’ (in pipeline schemes); and**

- **Funding gaps for some infrastructure categories, such as Community Investment and Libraries & Archives appear low. This does not mean that CIL receipts will not be spent on such schemes. It is simply a reflection of what is in the Infrastructure Schedule in that: some schemes will not have been identified; some schemes are already fully funded; some schemes are to be delivered through S106s or ‘on-site’.**

Estimated CIL income & remaining funding gap

3.2.29 An estimate of potential CIL income has been undertaken and summarised in Figure 3.11 based on:

- The proposed CIL charge rates set out in section 5;
- Known future housing sites (based on the Strategic Housing Land Availability Assessment, ‘SHLAA’, which does not include any ‘windfalls’) and an estimation of borough CIL-liable floorspace; and
- Future commercial floorspace quantum remaining to be developed from the Relevant Plan and an estimation of borough CIL-liable floorspace.

Year	Period	Estimated CIL Income
2014-15 – 2016/17	3 years	£2.7m
2017/18 – 2021/22	5 years	£21.0m
2022/23 – 2026/27	5 years	£21.3m
2027/28 – 2032/32	5 years	£13.4m
Total 2014/15 – 2032/32	18 years	(£3m / year average) £58.3m
less total infrastructure funding gap for CIL		– £379m
equals remaining funding gap after CIL		= £320.7m

Figure 3.11 Estimated CIL income and remaining funding gap

3.2.30 This demonstrates that CIL will only be able to make a contribution towards the borough’s total infrastructure funding gap and it will not be able to cover the costs for all schemes.

3.2.31 It would be expected that other sources of funding (including other developer contributions such as S106s) will become available over time and these could reduce the funding gap, however, it would be unrealistic to expect that the overall resultant funding gap will not be substantial. In light of this, future spending of CIL will need to be rigorously prioritised to inform decisions on CIL expenditure.

3.3 Neighbourhood CIL

3.3.1 The council “must allocate at least **15% of levy receipts** to spend on priorities that should be agreed with the local community in areas where development is taking place” (capped at £100 per council tax registered dwelling), and this can increase to **25% if a Neighbourhood Plan** is adopted for an area. This

‘Neighbourhood CIL’ does not have to be spent on just ‘infrastructure’ (see section 3.1), but may also be spent on “**anything else that is concerned with addressing the demands that development places on an area**”⁶¹.

- 3.3.2 Based on the estimated CIL income provided in Figure 3.11, Neighbourhood CIL could equate to approximately £3m x 15% = **£450,000 per year on average for the borough as a whole**. However, this figure is based on a broad estimate and the actual Neighbourhood CIL expenditure would depend on the actual quantum and location of CIL-liable development which gets built, to ensure the Neighbourhood CIL is truly spent to address demands that development places on areas.
- 3.3.3 To help decide on what Neighbourhood CIL should be spent on, the council intends to “use **existing community consultation and engagement processes**” to engage with communities and neighbourhoods, as well as involving **local businesses and ward councillors**⁶².
- 3.3.4 Whilst it will be some time before substantial amounts of CIL are likely to be received by the council for use on Neighbourhood CIL (see Figure 3.11 and section 6.1), the council considers it appropriate to use this Draft Charging Schedule consultation as the **first opportunity** for suggestions for Neighbourhood CIL expenditure to be put forward. The council expects to provide **further opportunities** for Neighbourhood CIL suggestions to be put forward once the council’s CIL is in effect and as CIL revenue is collected, which will be confirmed closer to the time.
- 3.3.5 Section 6.4 sets out how suggestions can be put forward as part of this initial consultation on the Neighbourhood CIL.

⁶¹ Planning Act 2008 S216A-B; R59A-59F; see also NPPG072

⁶² NPPG073

4. Viability

4.1 Legislative & policy context

4.1.1 The council must set CIL charges which do “not threaten the ability to develop viably the sites and scale of development identified in the relevant Plan”⁶³.

4.1.2 In doing so, the council must present “**appropriate available evidence**”⁶⁴ that shows the “potential effects of the proposed levy rate or rates on the **economic viability** of development across [its] area”⁶⁵. Viability can be defined as follows:

An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return⁶⁶ to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.⁶⁷

4.1.3 More generally, the NPPF requires that “the sites and the scale of development identified in the plan should **not be subject to such a scale of obligations and policy burdens that their ability to developed viably is threatened**”⁶⁸.

4.2 Methodology & approach

4.2.1 A Viability Study (**Appendix 5**) has been prepared by consultants Peter Brett Associates (PBA, formerly Roger Tym & Partners) to provide the main viability evidence base for the Draft Charging Schedule.

4.2.2 The full methodology, appraisals and recommendations can be found in the document itself, however a summary and the key conclusions are set out here. The government acknowledges that there is no single approach for assessing viability⁶⁹.

4.2.3 As set out in section 2.2, the Viability Study is particularly complemented and supported by the SPDs and viability evidence prepared for White City East, Earls Court & West Kensington and South Fulham Riverside.

⁶³ NPPG009

⁶⁴ Planning Act 2008 S211(7A); NPPG019

⁶⁵ NPPG018

⁶⁶ See also NPPG Viability para.15; Crossrail SPG para.6.5

⁶⁷ Local Housing Delivery Group (June 2012) Viability Testing Local Plans: Advice for Planning Practitioners

⁶⁸ NPPF para.173; see also paras. 21, 160, 173-177; NPPG Local Plans para.18; NPPG Planning Obligations para.2; NPPG Viability para.1; NPPG008; NPPG093

⁶⁹ NPPG Viability para.2

4.2.4 The Viability Study approach involved the following steps:

1. A market analysis established typical sales values and benchmark land values for different uses. This identified a considerable range of residential values in the north, centre and south of the borough; and, a considerable range of benchmark land values. In addition, the White City East part of the White City Opportunity Area and the Earls Court & West Kensington Opportunity Area were identified as having different values from the north and central parts of the borough. This is in accordance with the requirement for the council to use “an **area-based approach, involving a broad test of viability** across [its] area”⁷⁰.
2. A number of hypothetical development scenarios were set for testing in the North, Central, South, White City East and Earls Court & West Kensington areas. These scenarios cover a range of site sizes and densities, with single or mixed uses, including scenarios appropriate for testing strategic sites. This is in accordance with the requirement for the council to “directly **sample an appropriate range of types of sites** across its area” and “focus on **strategic sites** on which the relevant Plan... relies”, and “those sites where the impact of the levy on economic viability is likely to most significant (such as brown field sites)”. This sampling has been considered to “provide a robust evidence base about the potential effects of the rates proposed, balanced against the need to avoid excessive detail”⁷¹.
3. A residual land value viability appraisal was carried out for each development scenario (see Viability Study Appendices) using **present day assumptions on values and costs**⁷². This compared the total value of each development with all its costs including normal developer profit and the Mayor of London’s CIL⁷³, in order to establish whether the scenario would produce a positive residual value (i.e. gross development value minus gross development costs).
4. The residual value was compared with a **benchmark land value (BLV)**⁷⁴ to establish if the development would be viable enough to pay for the land and still have a surplus or overage (see Figure 4.1).
5. The development scenarios for each use and area were assessed to establish how much CIL it would be appropriate to take from the overage without impacting on viability. This produced recommended CIL charge rates and confirmed the choice of **differential charges for different uses and areas** for CIL purposes, whilst avoiding “undue complexity”. In particular, the council has considered that where the evidence shows there is a “**strategic site, which has low, very low, or zero viability...a low or zero levy rate** in that area” has been considered⁷⁵.

⁷⁰ NPPG019

⁷¹ NPPG019; see also NPPG Viability para.5

⁷² See NPPG Viability paras.12-13 for alternative definitions of values and costs

⁷³ R14(3); NPPG026; Crossrail SPG para.6.4

⁷⁴ See NPPG Viability para.14 for alternative definitions of land value

⁷⁵ NPPG021

4.2.5 Figure 4.1 illustrates the approach taken to assessing viability and deriving an overage. If an actual development scheme was being appraised then it may be considered to be viable provided there is sufficient residual value to meet all its costs (including land, CIL and any necessary S106s). However, viability assessments of this strategic nature for CIL purposes involve a high degree of generalisation. Individual sites may have values and costs that vary from the assumed levels; there may be a need for site specific S106s; and, an additional incentive, over the benchmark land value, may be necessary to persuade the landowner to bring forward the land for development.

4.2.6 In addition, on any individual site there could be significant abnormal costs (such as land decontamination) in excess of contingency that would not be known until site investigations take place. It would be expected that abnormal costs would be reflected in the price the developer would be prepared to pay, in which case, the benchmark land value assumed in the Viability Study would be reduced. However, that might not always be the case, especially if the land value was reduced below the level at which the landowner would be prepared to sell, so some of the overage shown in the diagram may then be needed to pay for abnormal costs.

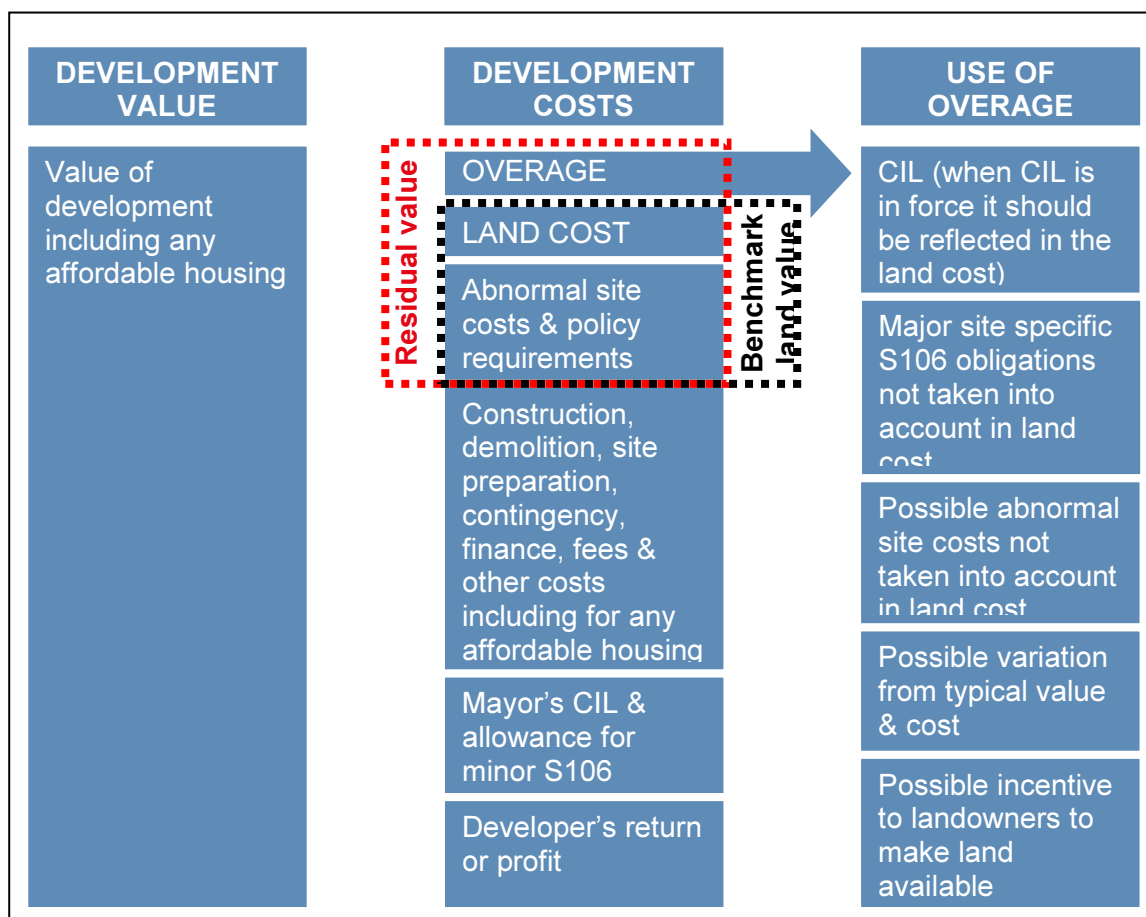


Figure 4.1: Illustration of the approach to assessing the level of CIL charge

- 4.2.7 For the reasons given above, it would not be appropriate for CIL to be charged at a level that would absorb all the overage. Therefore, a judgement has been made in the Viability Study about the proportion of the overage that could be taken by CIL without risking the sample development becoming unviable. The Viability Study has not applied a standard proportion or viability buffer but, in practice, CIL as a proportion of overage varies between only 6% and 25% for residential and mixed-use schemes and 15-54% for single use commercial (see section 4.4).
- 4.2.8 It should be noted that although the methodology shows CIL coming from the overage, when CIL has been introduced, it would be expected that it would affect the land cost. This point was made by the Examiner for the Mayor of London's CIL Charging Schedule who said "Finally the price paid for development land may be reduced. As with profit levels there may be cries that this is unrealistic, but a reduction in development land value is an inherent part of the CIL concept"⁷⁶.

Affordable housing

- 4.2.9 When making assumptions on development costs as part of the Viability Study, it is important to take into account affordable housing requirements in the relevant plan⁷⁷.
- 4.2.10 In the Viability Study affordable housing has been modelled at 40% of all housing, in accordance with Core Strategy⁷⁸ Policy H2 'Affordability', with an assumption that no grant will be available. The Study shows that housing schemes in the North, Central and South Zones should be sufficiently viable with this level of affordable housing, and be able to pay CIL charges as recommended, provided they do not deviate significantly from the Study's assumptions on costs and values.
- 4.2.11 As part of its viability evidence, the council must also provide information about "the extent to which [its] affordable housing... targets have been met"⁷⁹. The council's latest Monitoring Report for the 2012/13 year⁸⁰ states that 18% of the approved homes on sites of more than 10 units were affordable and 30% of the completed homes were affordable. This is elaborated on in Figure 4.2.
- 4.2.12 Recently approved housing schemes have generally not provided affordable housing at the 40% policy level on viability grounds. However, in some cases, developers have agreed to S106 review clauses that would enable the proportion of affordable housing to increase if economic conditions improve and higher rates of return become likely.

⁷⁶ The Planning Inspectorate (27th January 2012) Report on the Examination of the Draft Mayoral Community Infrastructure Levy Charging Schedule, para.32

⁷⁷ NPPG020; see also Crossrail SPG para.6.11

⁷⁸ LBHF (October 2011) Core Strategy

⁷⁹ NPPG018

⁸⁰ LBHF (July 2014) Monitoring Report April 2012 to March 2013

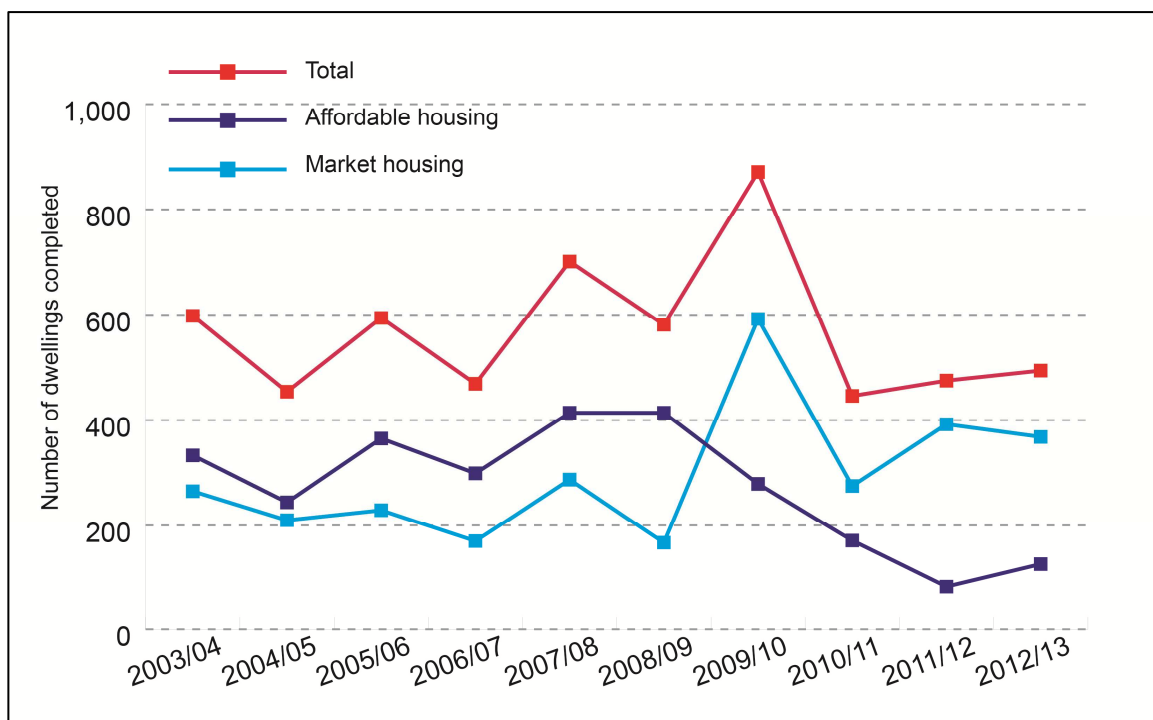


Figure 4.2: Type of housing approved 2003/04 to 2012/13⁸¹

4.2.13 The reduction in affordable housing approvals in recent years reflects the worsening economic conditions that have affected development viability during the recession coupled with the limited availability of housing grant. The effect of the recession is also illustrated by the fall in local residential property prices shown by the Land Registry House Price Index in Figure 4.3 in 2008/9. The Index shows that house prices only started to clearly recover to above the late 2007 / early 2008 levels in Spring 2011. Growth since then has been strong (32% over the last two years and 16% over the last year). The fact that the growth has continued now supports a more optimistic view of residential property values and development viability than would have been the case with many of the planning approvals over the last few years. Rising residential property prices also emphasise the importance of affordable housing. Therefore, the council would expect to see very much increased levels of affordable housing in future residential developments (even without grant) in accordance with policy and notwithstanding site-specific viability considerations.

4.2.14 Whilst the Viability Study set costs and value assumptions at reasonable levels, the appraisal of actual development proposals could differ for a variety of different reasons, such as those mentioned in paragraph 4.2.5. The particular factors applying in individual cases could vary. If it is robustly demonstrated that future schemes have particular unavoidable factors that prevent them from being viable with 40% affordable housing then the proportion could be reduced, in accordance with policy, as has happened in a number of cases. It should be noted that Core Strategy Policy H2 'Affordability' sets the 40% target over a ten-year time period of between 2011-21.

⁸¹ LBHF (July 2014) Monitoring Report April 2012 to March 2013: Figure 5

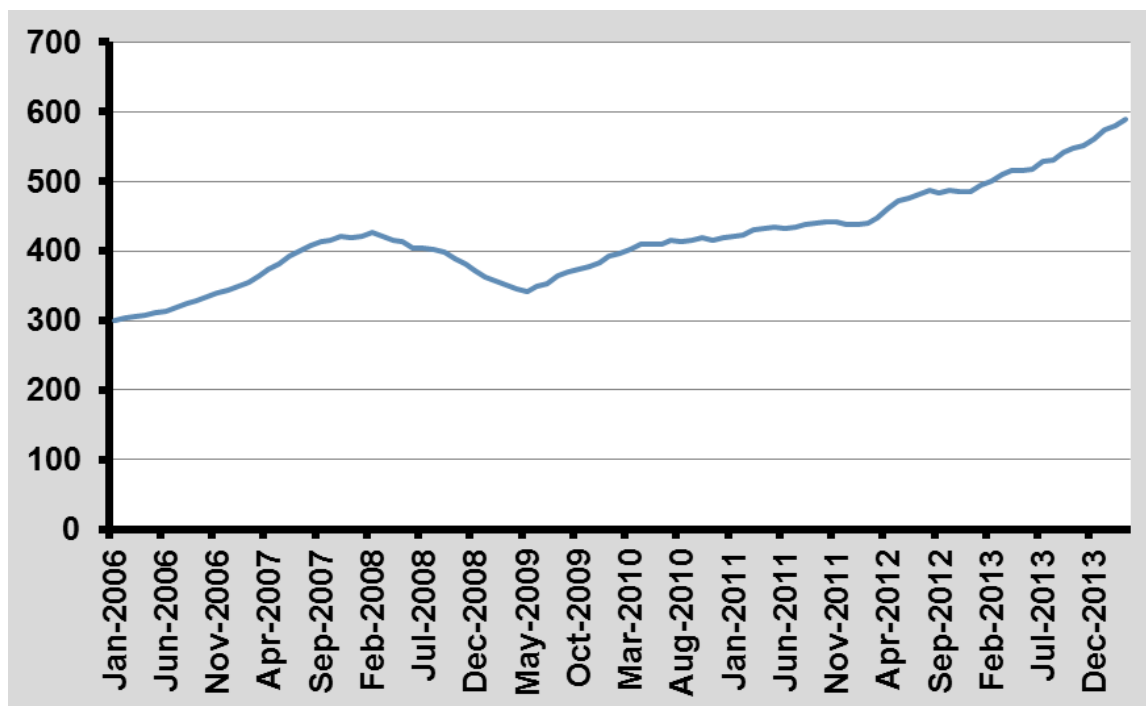


Figure 4.3 Land Registry House Price Index for LBHF

- 4.2.15 The information in section 4.4 indicates that the proposed CIL charges represent a very small percentage of costs and gross development value. Therefore, CIL is not likely to be a significant factor in a scheme becoming unviable. If there is a clear case for reducing affordable housing it is more likely to be for other reasons affecting viability rather than CIL.

S106s

- 4.2.16 In carrying out the Viability Study, the possibility of future S106s has been dealt with as follows⁸²:

- In most of the viability appraisals a sum of £1,000 per private residential unit has been included for minor S106/S278 contributions. Analysis of a number of recent S106s indicates that this is a reasonable assumption on average. This does not mean that all residential developments will be expected to actually make contributions at this level. The actual contribution may be greater, smaller or nil.
- It is recognised that in some cases more substantial contributions might be required and this is allowed for in the methodology relating to the overage as described above (Figure 4.1). Where S106s are related to policy requirements of the relevant Plan it would be expected that this would have been taken into account in the price for the land, effectively reducing the benchmark land value. However, if the cost of S106s is not wholly dealt with in this way then the methodology assumes that the costs will come from the overage. In the proposed CIL Zones, as CIL takes no more than 25% of the overage (section

⁸² See also Crossrail SPG para.6.13

4.4), there is clearly considerable scope for additional S106s if there are no other calls on the overage. Analysis of recent S106s in the proposed CIL Zones indicates that the average cost of site specific obligations after CIL is introduced would, on average, be largely absorbed by the £1,000 per private residential unit allowance noted above, though this will not apply to all schemes.

- In White City East, Earls Court & West Kensington and South Fulham Riverside, site-specific infrastructure that is needed to mitigate local impact is identified in the SPDs and supporting DIFS prepared for those areas (section 2.2). The way this has been taken into account is explained in the sections below covering each area respectively.

4.2.17 The council must also “provide information about the amount of funding collected in recent years through S106 agreements”⁸³ as part of the evidence base. The table below shows the financial contributions in S106 obligations that have been approved since January 2011.

FINANCIAL CONTRIBUTIONS IN S106 OBLIGATIONS APPROVED IN RECENT YEARS (excluding final highway payments)	
2011	£15,803,943
2012	£77,793,385
2013	£38,810,475
2014 (to July) and pending approval	£39,983,389
TOTAL	£172,391,192

Figure 4.4 S106 obligations approved in recent years

⁸³ NPPG018; see also NPPG Viability para.4

White City East

- 4.2.18 From using largely the same assumptions as the DIFS for this area, section 5.7 of the Viability Study concludes that a CIL charge of £80/m² could be justified for all uses in White City East. However, it also recommends that if the council pursued a policy approach to secure future infrastructure by means of S106s then the CIL charge should be £0/m².
- 4.2.19 The Study suggests that if the delivery of essential infrastructure identified in the DIFS is sought through S106s rather than CIL, the potential remaining overages after S106 costs would be significantly reduced and development in the area would not be able to bear a CIL charge. In addition, if part or all of the DIFS identified abnormal costs did not lead to a reduction in land value, there could be further major impact on the overage. The CIL methodology, is based on maintaining a satisfactory overage for the additional reasons illustrated in Figure 4.1.
- 4.2.20 Most sites have already had planning permission granted for redevelopment alongside considerable S106 contributions towards the identified DIFS infrastructure, largely on a pooled basis. The council considers that it is appropriate to continue to seek S106s in order to directly mitigate the development in the area and that it should be possible to do this without contravening the limits on pooling S106s.
- 4.2.21 On this basis, the council accepts the Viability Study recommendation for a £0/m² charge in this area on viability grounds.

Earls Court & West Kensington

- 4.2.22 From using largely the same assumptions as the DIFS for this area, section 5.7 of the Viability Study concludes that a CIL charge cannot be supported.
- 4.2.23 Unlike, other appraisals the Study is able to include some site-specific infrastructure and abnormal costs which results in a negligible overage. There are also additional S106 costs which would lead to an even lower overage (likely negative) for the purposes of the CIL viability modelling exercise.
- 4.2.24 The entirety of the main site has already had outline planning permission granted for redevelopment alongside considerable S106 contributions towards identified infrastructure need. The council considers that it is appropriate to continue to seek S106s from future developments in order to directly mitigate the development in the area and that it should be possible to do this without contravening the limits on pooling S106s.
- 4.2.25 On this basis, the council accepts the Viability Study recommendation for a £0/m² CIL charge in this area on viability grounds.
- 4.2.26 It should also be noted that the Opportunity Area is partly within the Royal Borough of Kensington and Chelsea and the two boroughs have worked closely together on planning and CIL matters. The emerging proposed CIL charge for the

remainder of the Opportunity Area land in the neighbouring Royal Borough of Kensington and Chelsea is £0/m²⁸⁴.

South Fulham Riverside & the South Zone

- 4.2.27 In light of consideration of the DIFS for this area, section 5.7 of the Viability Study concludes that South Fulham Riverside should be included within the South Zone for CIL purposes, with a charge of £400/m² for private residential floorspace.
- 4.2.28 A separate DIFS has been carried out for South Fulham Riverside and approved development has made a considerable contribution, largely pooled, towards the total infrastructure costs estimated at just over £82million.
- 4.2.29 When CIL is in force it is expected that contributions to the cost of most physical infrastructure facilities for the area, except for those directly related to mitigating development (such as highway works) will be collected by CIL, in accordance with the Draft R123 List in Appendix 4. However, it is estimated that other S106 requirements in the South Fulham Riverside area (the principal area for future development in the Zone), based on the DIFS, could be approximated at up to around £100/ m² for each private residential unit. Nevertheless, it is considered that schemes in that area would still be sufficiently viable for a CIL charge of £400/ m² on private residential floorspace

⁸⁴ RBKC (March 2014) Draft Charging Schedule (submission version)

4.3 Viability Study recommended charge rates

4.3.1 The Viability Study recommends that development could support the CIL charges set out in Figure 4.5.

Use	South Charging Zone	Central Charging Zone		North Charging Zone
		Within Hammersmith Town Centre	Outside Hammersmith Town Centre	
Charge for all uses unless otherwise stated	£80/m ²			
Residential	£400/m ²	£200/m ²		£100/m ²
Office (B1a/b)	£0/m ²	£80/m ²	£0/m ²	£0/m ²
Industrial (B1c/B2) and warehousing (B8) uses	£0/m ²			
Hotels	£0/m ²			
Health and Education uses*	£0/m ²			
White City East**	£80/m ² or £0/m ²			
Earls Court and West Kensington Opportunity Area	£0/m ²			

Figure 4.5: Recommended CIL charges (Table 6.1 of the Viability Study)

*Education and health are defined as per the Mayor of London's CIL Charging Schedule⁸⁵

**See section 5.7 of the Viability Study

⁸⁵ Mayor of London (February 2012) CIL Charging Schedule

4.4 Proposed charge rates as a proportion of overage, costs & values

- 4.4.1 To avoid setting a charge “right at the margins of viability”, the council’s proposed rates “should be reasonable... but there is **no requirement for a proposed rate to exactly mirror the evidence**”. The NPPG on CIL states that there is “room for some pragmatism” and that it is “appropriate to ensure that a ‘buffer’ or margin is included, so that the levy rate is able to support development when economic circumstances adjust”⁸⁶.
- 4.4.2 The council considers that, in addition to the overage methodology, it is also valid from a viability point of view to consider CIL as a proportion of overall scheme costs and values.
- 4.4.3 Figure 4.6 compares the proposed charge rates with overage and Gross Development Value (‘GDV’).
- 4.4.4 It is assumed that 40% affordable housing is eligible for social housing relief from CIL (see 1.2.2). Therefore, when the total proposed residential CIL charges are averaged over all floorspace they average 60% of the full charge. The commercial floorspace in the mixed use schemes is assumed to all pay CIL at £80/m² but, in practice, some of this would be office space or other uses with a £0/m² charge.
- 4.4.5 The figure shows that the **proportion of overage taken for CIL does not exceed 24% for the residential and mixed use schemes in the three proposed CIL Zones and 54% for the single use schemes**. This leaves a viability buffer to absorb the other possible costs indicated in Figure 4.1.
- 4.4.6 Paragraph 6.2.4 of the Viability Study states that CIL “equates to a nominal amount when compared to Gross Development Value and the ‘cost’ of additional requirements such as affordable housing, contingencies, build costs etc. Previous CIL Examinations have indicated that a CIL charge of between 1% and 4% of GDV are likely to be appropriate”.

⁸⁶ NPPG020; see also NPPG Viability para.8

Viability Appraisal		CIL £/m2 overall Assuming all non-residential floorspace liable	CIL as % of overage	CIL as % of GDV
N1	10 houses	£60	6%	1.5%
N2	50 flats	£60	13%	1.5%
N3	500 flats	£60	11%	1.5%
N4	750 flats	£60	10%	1.5%
N5	500 flats & 10k commercial	£64	24%	1.8%
N6	750 flats & 15k commercial	£64	18%	1.8%
C1	10 houses	£120	8%	2.1%
C2	50 flats	£120	14%	2.4%
C3	500 flats	£120	11%	2.4%
C4	750 flats	£120	8%	2.4%
C5	500 flats & 10k commercial	£112	15%	2.4%
C6	750 flats & 15k commercial	£112	12%	2.4%
S1	10 houses	£180	9%	3.1%
S2	50 flats	£180	18%	3.5%
S3	500 flats	£180	12%	3.5%
S4	750 flats	£180	10%	3.5%
S5	500 flats & 10k commercial	£159	18%	3.5%
S6	750 flats & 15k commercial	£159	12%	3.5%
HTC1	HTC offices	£80	15%	1.7%
BOR2	Comparison retail	£80	19%	1.9%
BOR3	Convenience retail	£80	29%	1.7%
BOR5	Student accommodation	£80	33%	2.2%
BOR6	Leisure	£80	54%	2.6%

Figure 4.6: Charge rates as % of overage and value

4.5 Proposed charge rates compared to neighbouring authorities

- 4.5.1 The proposed charge rates are broadly comparable to those established and emerging in the neighbouring boroughs of Kensington & Chelsea, Wandsworth, Richmond upon Thames, Hounslow, Ealing and Brent.
- 4.5.2 The established and emerging residential charge rates in these boroughs are indicatively mapped in Appendix 6. Reference should be made to the respective authorities' established and emerging CIL Charging Schedules in the first instance, available from their websites.

5. Draft Charging Schedule

5.1 Charge rates per square metre (“/m²”)

5.1.1 Based on the evidence, the proposed CIL charging rates for the borough are set out in Figure 5.1 with the proposed Charging Zones illustrated in Figure 5.2.

Uses	Residential (C3)	Office (B1a/b)	All uses unless otherwise stated	Health*
				Education**
Charging Zones	HMO (C4)	Hostel	All uses unless otherwise stated	Industrial (B1(c)/B2)
	Hostel			Warehousing (B8)
				Selling/display of motor vehicles
				Scrapyards
				Hotel (C1)
North	£100/m ²	Nil	£80/m ²	Nil
Central A†	£200/m ²	£80/m ²		
Central B		Nil		
South	£400/m ²	Nil		
White City East‡	Nil			
Earls Court & West Kensington Opportunity Area‡	Nil			

Figure 5.1 Proposed CIL charge rates (Nil = £0/m²)

5.1.2 * Health is defined as “Development used wholly or mainly for the provision of any medical or health services except for the use of the premises attached to the residence of the consultant or practitioner”⁸⁷.

5.1.3 ** Education is defined as “Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education”⁸⁸.

5.1.4 † The Central A Charging Zone boundary is the same as the Hammersmith Town Centre boundary on the council’s adopted Proposals Map⁸⁹.

5.1.5 ‡ It should be noted that, whilst a £0/m² (nil) rate is proposed at White City East and Earls Court & West Kensington Opportunity Area, this does not mean that the council will not receive significant financial contributions from developments in these areas as S106s will continue to be used (section 4.2).

5.1.6 The format and content of the DCS⁹⁰ is replicated in this section.

⁸⁷ As per Mayor of London (February 2012) CIL Charging Schedule

⁸⁸ As per Mayor of London (February 2012) CIL Charging Schedule

⁸⁹ LBHF (October 2011) Core Strategy



Figure 5.2: CIL Charging Zones

5.2 Charging authority

5.2.1 The charging authority is the London Borough of Hammersmith & Fulham.

5.3 Date of approval

5.3.1 The Charging Schedule was approved by the council on [date to be inserted].

5.4 Date of effect

5.4.1 The Charging Schedule will become effective on [date to be inserted] (see section 6.1).

5.5 Calculation of CIL charge & indexation

5.5.1 The 'Chargeable Amount', including indexation to take into account inflation, will be calculated in accordance with the Community Infrastructure Levy Regulations 2010 (as amended), particularly Part 5, Part 6 and Regulation 6. This is interpreted in more detail in section 1.2.

5.6 CIL-related policies

5.6.1 The council's CIL-related policies will be published on its website at www.lbhf.gov.uk/cil. The council's current intentions regarding CIL-related policies are:

Regulation	Policy	Status
44/45	Discretionary Charitable Relief ⁹¹	No current intention to publish
49A	Discretionary Social Housing Relief ⁹²	No current intention to publish
55	Discretionary Exceptional Circumstances Relief ⁹³	No current intention to publish
69B	Instalments ⁹⁴	No current intention to publish <i>Intending to follow the Mayor of London's Instalments Policy⁹⁵</i>

Figure 5.3 CIL-related policies

⁹¹ R44-46; NPPG115

⁹² R49A-49B; NPPG123

⁹³ R55-58; NPPG129

⁹⁴ Planning Act 2008 S217(2)(b); R69B-70; NPPG055

⁹⁵ R70(4); Mayor of London (March 2013) CIL Instalments Policy

5.7 Statutory compliance

- 5.7.1 The Charging Schedule has been issued, approved and published in accordance with the CIL Regulations 2010 (as amended) and Part 11 of the Planning Act 2008 (as amended).

5.8 State aid

- 5.8.1 State aid is a concept derived from European Law ('EU Law'). In very broad terms EU Law prohibits a European Union member state from providing support to 'undertakings' (i.e. persons engaged in economic activity) which distorts or threatens to distort competition, affects trade between member states of the European Union and which favours certain undertakings or the production of certain goods⁹⁶. In setting differential rates, including zero rates, the council must not do so "in such a way that they constitute a notifiable state aid under European Commission regulations"⁹⁷.
- 5.8.2 The council has only set the differential rates, including zero rates, where this is based on economic viability evidence which justifies this approach. In light of the the government guidance on state aid⁹⁸ and relevant legislation, the council does not consider that these proposals give rise to unlawful state aid as explained below:

Is the assistance granted by the state or through state resources (including tax exemptions)?

The proposed nil rates represent an exemption from paying CIL (a 'levy') to the council based on economic viability evidence.

It should be noted, however, that for the proposed differential Charging Zone nil rates (i.e. White City East and Earls Court & West Kensington Opportunity Area), developers are and will still be expected to make developer contributions through other mechanisms, notably S106s, so overall there is not an exemption from making developer contributions.

Does the assistance give an advantage to one or more undertakings (organisations engaged in economic activity) over others?

The proposed rates are based on economic viability evidence from broad market data and do not give organisations any particular advantage or disadvantage over other competitors.

In addition, as indicated above, developers will still have to make S106 payments so that no undertaking will gain an advantage over others.

⁹⁶ NPPG154

⁹⁷ NPPG024

⁹⁸ Adapted from Department for Business, Innovation & Skills (November 2010) State Aid Assessment and (November 2013) State Aid: The Basics

Does the assistance distort or have the potential to distort competition?

The proposed rates do not have the potential to distort competition due to the above reasons.

Does the assistance affect trade between member states?

The proposed rates do not affect trade between member states due to the above reasons.

5.9 Sustainability

- 5.9.1 Charging Schedules do not require a Sustainability Appraisal⁹⁹ as they are financial documents and not 'land use planning' documents.

5.10 Equalities

- 5.10.1 An initial Equalities Impact Assessment (EqIA) was undertaken and consulted on during the PDCS consultation for which no comments were received.
- 5.10.2 The EqIA has been updated for this Draft Charging Schedule and set out in Appendix 7, for which representations are also welcome, and is available from the council's website at www.lbhf.gov.uk/cil.

5.11 Review

- 5.11.1 Once in place, the council must keep the Charging Schedule under review and ensure that it remains appropriate over time e.g. in light of changes to market conditions and the infrastructure funding gap. The government does not prescribe when reviews should take place¹⁰⁰. It would be appropriate for the council to consider any review of the Charging Schedule in light of "other demands on development to ensure an appropriate balance... is maintained"¹⁰¹ and/or alongside or following future iterations of a Local Plan Review¹⁰².

5.12 Monitoring

- 5.12.1 The Monitoring Indicators in Appendix 8 of the Core Strategy¹⁰³ include monitoring the delivery of infrastructure schemes.
- 5.12.2 After the council starts charging CIL, the council must prepare short reports on CIL by the end of each calendar year for the previous financial year¹⁰⁴ covering information including¹⁰⁵:

⁹⁹ NPPG011

¹⁰⁰ Planning Act 2008 S211(9); NPPG043

¹⁰¹ Crossrail SPG para.6.16

¹⁰² NPPG011

¹⁰³ LBHF (October 2011) Core Strategy

- Total CIL receipts for the reported year.
- Total CIL expenditure for the reported year.
- Summary details of CIL expenditure during the reported year including:
 - the items of infrastructure to which CIL (including land payments) has been applied;
 - the amount of CIL expenditure on each item;
 - the amount of CIL applied to repay borrowed money, including any interest, with details of the infrastructure items which that money was used to provide (wholly or in part); and
 - the amount of CIL applied to administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation.
- The amount of CIL passed to any local council or any person to spend on infrastructure.
- Summary details of the receipt and expenditure of CIL relating to Neighbourhood CIL funds.
- Total amount of CIL receipts retained at the end of the reported year (including from previous years) for both Neighbourhood CIL funds and non-Neighbourhood CIL funds projects.

5.12.3 It is intended that these monitoring requirements will be reported through the council's Monitoring Report which is currently published on an annual basis on the council's website at www.lbhf.gov.uk/ldf.

5.12.4 It should be noted that the council became a collecting authority for the Mayor of London's CIL on 1st April 2012, for which the Mayor produces his own report.


¹⁰⁴ Planning Act 2008 S216(7); R62(5); NPPG087

¹⁰⁵ R62(4); see also R34(5) of The Town and Country Planning (Local Planning) (England) Regulations 2012

6. How to comment & timetable

6.1 What is the timetable?

6.1.1 The Draft Charging Schedule represents the second stage of public consultation in the process that will lead to the introduction of CIL charges for most new development in the borough (see section 1.2). The expected timetable is (subject to change):

<ul style="list-style-type: none"> • Friday 7th September to Friday 19th October 2012 (6 weeks) 	<p>Preliminary Draft Charging Schedule (PDCS)¹⁰⁶ consultation</p>	<p>Consultation closed See section 6.2 for summary of comments</p>
<ul style="list-style-type: none"> • Friday 22nd August to Friday 3rd October 2014 (7 weeks)¹⁰⁷ 	<p>Draft Charging Schedule (DCS)¹⁰⁸ consultation</p>	
<ul style="list-style-type: none"> • Autumn / Winter 2014 	<p>Submission of DCS for examination¹⁰⁹</p>	
<ul style="list-style-type: none"> • Late 2014 	<p>Independent public examination¹¹⁰</p>	
<ul style="list-style-type: none"> • Early 2015 	<p>Publication & effect¹¹¹</p>	
<ul style="list-style-type: none"> • 2016+ 	<p>Accumulation of CIL receipts Neighbourhood CIL expenditure</p>	

6.1.2 **Representations must be received by the council by 5pm on Friday 3rd October 2014.**

6.2 What comments have been made so far?

6.2.1 The council must take into account representations on the PDCS before it publishes the Draft Charging Schedule¹¹².

6.2.2 Subsequently, the council has had further discussions with some of those who made representations (including early engagement with local developers and the

¹⁰⁶ R15; NPPG028

¹⁰⁷ R17(3) requires at least 4 weeks; NPPG031 suggests at least 6 weeks; Revised SCI Table 3.3 requires at least 6 weeks

¹⁰⁸ Planning Act 2008 S211(1); R12; R16; NPPG012; NPPG030

¹⁰⁹ R19; NPPG032

¹¹⁰ Planning Act 2008 S212; R19-24; NPPG033

¹¹¹ Planning Act 2008 S213-214; R25; R28; NPPG040

¹¹² R15(7)

property industry¹¹³) in order to clarify issues and assess the extent to which it was possible and appropriate to modify any aspect of the approach to determining charging rates – these are referred to as ‘Pre-DCS’ consultation responses.

- 6.2.3 All of the representations received and the council’s responses are detailed in Appendix 8 and a summary of these sorted by issue is provided in Appendix 9. The council’s response to the principal areas of comment is summarised further in the sections below.

CIL Charging Zones

- Agreed that the Earls Court & West Kensington Opportunity Area should be dealt with as a separate Charging Zone based on viability evidence. The introduction of the separate White City East Charging Zone enables more particular assumptions to be used for appraisals (see section 4.2).
- Not agreed that there is evidence that the wider Fulham Regeneration Area should be a separate Charging Zone.
- Not agreed that Stamford Bridge Football Stadium should be included in the Central Zone as the area is likely to have more in common with the residential values of the South Zone (see section 4.2).

Affordable housing

- Not agreed that affordable housing targets would prevent contributions to infrastructure from developments. In any particular case, policy permits a reduction in affordable housing for viability reasons. The proposed CIL charges represent a very small proportion of gross development value or scheme costs (see section 4.4).

S106 costs

- Agreed (especially in the light of revised CIL guidance) that greater clarity on future S106 costs is necessary. Most residential appraisals include an allowance of £1,000 per private residential unit and further consideration has been given to the approach to dealing with S106 costs in White City East, Earls Court & West Kensington and South Fulham Riverside (see section 4.2).

Sample sites

- Agreed (especially in the light of revised CIL guidance) that the range of sample sites should include larger and mixed use schemes appropriate to assessing the viability of strategic sites (see section 4.2).

¹¹³ NPPG014; NPPG019; NPPG021

Development costs and values

- Not agreed that the viability methodology does not allow for abnormal costs but this is clarified in the Viability Study and this document (see section 4.2).
- Not agreed that the proposed benchmark land values are generally inappropriate but these have been reviewed and increased where necessary, especially for White City East.
- Not agreed that build costs which are based on Building Cost Information Service (BCIS) data are generally too low but these have been updated in the Viability Study.
- Various comments were made about other costs and assumptions on phasing used in the sample appraisals. The assumptions have been reviewed in the Viability Study and have been updated where appropriate. In particular, the allowance for on-site external works has been increased.
- Not agreed that residential values used in the South Zone are too high. Residential property values in the borough have increased considerably in the last few years as explained in the Viability Study.

CIL charges and uses

- Not agreed that there is evidence that the North and Central Zone charges are too high.
- Not agreed that in view of likely future S106 costs in South Fulham Riverside, the proposed charge of £400/m² in the South Zone should be reduced.
- Not agreed that there is evidence that the following uses would be unable to pay CIL at £80/m²: fire stations, police facilities, football stadiums, D1 uses.
- Agreed, in the light of further evidence in the Viability Study, that hotels should have a £0/m² charge (see sections 4.3 and 5.1).

CIL policies

- Agreed there will be an Instalments Policy – i.e. intending to follow the Mayor of London's Instalments Policy (see section 5.6).
- It is not currently proposed to introduce a Discretionary Exceptional Circumstances Relief policy (see section 5.6).
- In order to qualify for Social Housing Relief, any affordable housing product would need show it meets the relevant regulations (see section 1.2).

6.3 Who is being consulted?

6.3.1 Any person may make representations about the Draft Charging Schedule¹¹⁴. The council is consulting:

- Communities, neighbourhoods, local businesses and ward councillors (see section 3.3);
- Councils adjoining the council's area¹¹⁵:
 - Royal Borough of Kensington and Chelsea;
 - London Borough of Wandsworth;
 - London Borough of Richmond upon Thames;
 - London Borough of Hounslow;
 - London Borough of Ealing;
 - London Borough of Brent;
- The Mayor of London¹¹⁶;
- The Local Enterprise Partnership¹¹⁷, which, covering the council's area is the London Enterprise Panel (LEP);
- Local developers and the property industry¹¹⁸
- Infrastructure providers¹¹⁹; and
- All bodies consulted during the PDCS stage¹²⁰, which also included¹²¹:
 - Local residents, businesses and business bodies; and
 - Voluntary bodies.

¹¹⁴ R17(1)

¹¹⁵ R11(1); R15(3); NPPG010; NPPG026

¹¹⁶ R11(1); R15(3); NPPG026

¹¹⁷ NPPG011

¹¹⁸ NPPG014; NPPG019; NPPG021; see also NPPG Viability para.4

¹¹⁹ NPPG014

¹²⁰ NPPG031

¹²¹ R15

6.4 What can I comment on?

Draft Charging Schedule & supporting evidence base

6.4.1 Formal representations on the **Draft Charging Schedule (DCS) and the supporting evidence base documents** are welcomed by the council.

6.4.2 **All such representations will be submitted to an independent examiner as part of the independent public examination and will be made publicly available for inspection on the council's website and other locations¹²².** Please note that although comments on the content of the Draft R123 List will be submitted to the examiner for information, it is not for the examination to challenge the list. The council will, however, consider all such comments.

6.4.3 The relevant sections and documents are:

- **Evidence base & striking a balance** – **Section 2**
- **Infrastructure** – **Section 3**
 - Appendix 3 Infrastructure Schedule
 - Appendix 4 Draft R123 List
- **Viability** – **Section 4**
 - Appendix 5 Viability Study
- **Draft Charging Schedule (DCS)** – **Section 5**

6.4.4 Anyone making such representations on the formal DCS may request¹²³:

- The right to be heard by an examiner upon the examination of the DCS¹²⁴ (such requests must be made before the end of the consultation period);
- To be notified of any of the following:
 - That the DCS has been submitted to the examiner in accordance with section 212 of the Planning Act 2008;
 - The publication of the recommendations of the examiner and the reasons for those recommendations; and
 - The approval of the charging schedule by the charging authority.

6.4.5 A person who has made representations about the DCS may withdraw those representations at any time by giving notice in writing to the council¹²⁵.

¹²² R19

¹²³ R16(2); NPPG030

¹²⁴ Planning Act 2008 S212(9); R16(2)(d); R21(1)

Neighbourhood CIL & Equalities Impact Assessment (EqIA)

- 6.4.6 Representations on the **Neighbourhood CIL** and the **Equalities Impact Assessment (EqIA)**, which are separate to the formal Draft Charging Schedule consultation, are also welcomed by the council.
- 6.4.7 **These representations will not be submitted to an independent examiner as they will not be part of the independent public examination. A summary of the representations will be made publicly available for inspection on the council's website.**
- 6.4.8 The relevant sections and documents are:
- **Neighbourhood CIL** – **Section 3.3**
– Appendix 3 Infrastructure Schedule
 - **Equalities Impact Assessment (EqIA)** – **Section 5.10**
– Appendix 7 EqIA

6.5 Where can I view the consultation documents?

6.5.1 All the consultation information and relevant documents are available from¹²⁶:

- **Website** www.lbhf.gov.uk/cil
- **Libraries** Reference-only copies are available from:

Askew Road Library
Avonmore Library
Fulham Library
Hammersmith Library
Hurlingham and Chelsea School and Community Library
Shepherds Bush Library

For details and opening hours, please see:
www.lbhf.gov.uk/libraries
- **Hammersmith Town Hall Extension** Reference-only copies are available from:

First Floor, Hammersmith Town Hall Extension, King Street, Hammersmith, London W6 9JU

For details and opening hours, please see:
www.lbhf.gov.uk/planning > [Planning Applications](#) > [Advice > Duty Planner Service](#)

¹²⁵ R17(4)

¹²⁶ R16(1)

6.5.2 The document will be made available in large print, or Braille format. If you require the document in one of these formats, please email cil@lbhf.gov.uk, phone 0208 753 7032, or write to the address above.

6.6 How do I comment?

6.6.1 Representations are invited by email or post:

- **Email** cil@lbhf.gov.uk
- **Post** Sid Jha
CIL Draft Charging Schedule Consultation
Development Plans Team
Planning Division
Transport & Technical Services
Hammersmith & Fulham Council
5th Floor, Town Hall Extension
King Street
Hammersmith
London W6 9JU

6.6.2 Representations should make clear which sections and documents are being commented on and also make clear any formal requests being made if the comments are part of the formal DCS consultation (see section 6.4). To make this easier, **a Consultation Response Form is available to complete in Appendix 11 and available from the council's website at www.lbhf.gov.uk/cil.**

6.6.3 The consultation on the DCS is being undertaken in accordance with the council's Revised Statement of Community Involvement (SCI)¹²⁷ which is available on the council's website at www.lbhf.gov.uk/ldf.

6.6.4 A formal Statement of the Representations Procedure is available at Appendix 10.

6.6.5 **Representations must be received by the council by 5pm on Friday 3rd October 2014.**

¹²⁷ LBHF (October 2013) Revised Statement of Community Involvement (SCI)

Appendix 1 Glossary

Term / Abbreviation	Explanation	Relevant section
ASC	Adult Social Care	Figure 3.7
BCIS	Building Cost Information Service	Section 6.2
BLV	Benchmark Land Value	Section 4.2
CCG	Clinical Commissioning Group	Appendix 2
CIL	Community Infrastructure Levy	Section 1.1
CS	Children's Services	Figure 3.7
DCLG	Department for Communities and Local Government	Various
DCS	Draft Charging Schedule	Section 6.1
DIFS	Development Infrastructure Funding Study	Section 2.2
DM LP	Development Management Local Plan	Figure 2.3
ECWK	Earls Court & West Kensington	Section 2.2
ELRS	Environment, Leisure & Residents' Services	Figure 3.7
EqIA	Equalities Impact Assessment	Section 5.10; Appendix 7
EU	European Union	Section 5.8
FALP	Further Alterations to the London Plan	Figure 2.2
FCG	Finance & Corporate Governance	Figure 3.7
FRA	Fulham Regeneration Area	Section 2.2
GDV	Gross Development Value	Section 4.4
GIA	Gross Internal Area floorspace	Section 1.2

Term / Abbreviation	Explanation	Relevant section
GLA	Greater London Authority	Various
HM Government	Her Majesty's Government	Various
HMO	House in Multiple Occupation	Figure 5.1
HR	Housing & Regeneration	Figure 3.7
HS2	High Speed Rail 2	Section 2.2
HTC	Hammersmith Town Centre	Section 2.2
LA	Libraries & Archives	Figure 3.7
LEP	London Enterprise Panel	Section 6.3
LFB	London Fire Brigade	Appendix 2
LIP	Local Implementation Plan	Appendix 2
MDC	Mayoral Development Corporation	Section 2.2
MOPAC/MPS	Mayor's Office for Policing and Crime / Metropolitan Police Service	Appendix 2
Neighbourhood CIL	See section 3.3	Section 3.3
NHS	National Health Service	Appendix 2
NPPF	National Planning Policy Framework	Various
NPPG	National Planning Practice Guidance	Various
OAPF	Opportunity Area Planning Framework	Section 2.2
PAC	Planning Applications Committee	Section 3.2
PBA	Peter Brett Associates	Section 4.2
PDCS	Preliminary Draft Charging Schedule	Section 6.1

Term / Abbreviation	Explanation	Relevant section
PG SPD	Planning Guidance Supplementary Planning Document	Figure 2.3
R123	Regulation 123 of the CIL Regulations 2010 (as amended)	Section 3.2
RBKC	Royal Borough of Kensington & Chelsea	Various
Ref	Reference code based on Infrastructure Category	Paragraph 3.2.16; Figure 3.7
S106	Section 106 agreement	Section 3.2
S278	Section 278 of the Highways Act 1980 (as amended)	Section 4.2
SCI	Statement of Community Involvement	Section 6.6
SFR	South Fulham Riverside	Section 2.2
SHLAA	Strategic Housing Land Availability Assessment	Section 3.2
SPD	Supplementary Planning Document	Section 2.2
SI	Social Infrastructure	Figure 2.2
SPG	Supplementary Planning Guidance	Section 2.2
SUDS	Sustainable Urban Drainage Systems	Appendix 4
TTS	Transport & Technical Services	Figure 3.7
WC	White City	Various
WRWA	Western Riverside Waste Authority	Appendix 2

Appendix 2 Infrastructure Categories & Relevant Strategies

Infrastructure Category	Sub-Category	Planning Act 2008 S216 + NPPG Section 4	NPPF paras.	London Plan Policies + SPGs	London Plan Implementation Plan 1 + FALP Table 8.1	Core Strategy	DM LP	PG SPD Policies	White City Chapters	Earls Court & West Kensington Key Principles	South Fulham Riverside Chapters	Other relevant strategies
Adult Social Care (ASC)	Adult Social Care		162	3.17 SI (June 2014) Ch.4	Social Infrastructure		A5		5	Section 9.11		
	Health		17; 69; 156; 162; 171	3.2; 3.16-3.17 Housing (Nov 2012) section 6.3 SI (June 2014) Ch.4	Social Infrastructure	Objs.9; 11 Policy CF1 Paras. 3.36; 4.13; 8.58; 10.9	D1		5	SC2	12	<ul style="list-style-type: none"> NHS H&F Strategic Plan 2009-14 (Nov 2009) HF CCG Out of Hospital Care Strategy 2012-15 (Oct 2012) LBHF Health & Wellbeing Strategy Draft (Jun 2013) NHS North West London Shaping a Healthier Future (ongoing)
Page 87 Children's Services (CS)	Earls Years								5	SC1	12	<ul style="list-style-type: none"> LBHF Childcare Sufficiency Assessment 2011-14 (Aug 2011)
	Schools		72;162	3.16; 3.18 Housing (Nov 2012) section 6.2 SI (June 2014) Ch.5	Social Infrastructure	Objs.9-10 Policy CF1 Paras.3.33-3.35; 4.12; 7.32; 8.51-8.53; 10.7-10.8	D1		5	SC1	12	<ul style="list-style-type: none"> LBHF Special Educational Needs (SEN) Review (2008) LBHF School Organisation & Investment Strategy (Mar 2014)
	Youth								5			<ul style="list-style-type: none"> LBHF Children & Young People's Plan (Mar 2010) LBHF Commissioning of Youth Provision 2013-15 Cabinet Report (Jul 2012)
Environment, Leisure & Residents' Services (ELRS)	Culture				Social Infrastructure	Obj.9 Paras. 3.39	D1; D2		2			
	Community Safety		58; 69	3.16; 7.3 Housing (Nov 2012) section 6.1	Social Infrastructure	Objs.9; 12 Policies BE1; CF1	G1		5	SC6		<ul style="list-style-type: none"> LBHF Community Safety Partnership Strategic Assessment 2012-14 (Apr 2012)

Infrastructure Category	Sub-Category	Planning Act 2008 S216 + NPPG Section 4	NPPF paras.	London Plan Policies + SPGs	London Plan Implementation Plan 1 + FALP Table 8.1	Core Strategy	DM LP	PG SPD Policies	White City Chapters	Earls Court & West Kensington Key Principles	South Fulham Riverside Chapters	Other relevant strategies
Page 88	Emergency Services			3.16			D1			SC6	12	<ul style="list-style-type: none"> • LBHF Generic Emergency Plan (Sep 2010) • London Ambulance Service Estate Strategy (Jan 2011) • LBHF Crime & Disorder Reduction Partnership Strategic Assessment 2013-14 (Apr 2013) • MOPAC/MPS Estates Strategy 2013-16 (May 2013) • LFB Fifth London Safety Plan 2013-16 (Jul 2013)
	Leisure		9; 23; 73-74; 156; 161; 171	2.18; 3.16; 3.19; 4.6 Housing (Nov 2012) section 6.1 SI (June 2014) Ch.6	Social Infrastructure	Obj.9 Policy CF1 Paras. 3.39	D2		2; 5	CS1-CS2; SC4-SC5		<ul style="list-style-type: none"> • LBHF Leisure Needs Assessment (Mar 2010) • LBHF CSPAN Physical Activity Strategy 2011-16 (Nov 2011)
	Parks		58; 73-78; 109; 114; 117-119	2.18; 7.18-7.19; 7.23 Green Grid (Mar 2012) Housing (Nov 2012) section 6.1 Play & Informal Recreation (Sep 2012)	Social Infrastructure Green Infrastructure	Obj.15 Policy CF1; OS1 Maps 3; 8 Paras. 3.28; 3.37-3.38; 4.16; 8.54-8.57; 8.62; 10.11-10.13	D2; E1-E4	Design 8	2 5	UF5; UF10-13; ENE3; ENV18; ENV19	7; 12-13	<ul style="list-style-type: none"> • LBHF Open Spaces & Outdoor Recreation Facilities in H&F (Jan 2006) • LBHF Parks & Open Spaces Strategy 2008-18 (Jul 2008) • Parks Capital Programme 2013-16 Cabinet Report (Apr 2013)
	Waste & Street Enforcement		156; 162	5.16-5.17 Land for Industry & Transport (Sep 2012)	Waste	Policy CC3	H5	Sustainability 3-12; 27	6	ENV10-ENV13	13	<ul style="list-style-type: none"> • Mayor's Municipal Waste Management Strategy (Nov 2011) • LBHF Waste Prevention Plan 2011/12 (2011) • WRWA Waste Policy Statement (Jul 2013)
Finance & Corporate Governance (FCG)	Community Investment		17; 23; 70; 156	3.1; 3.16 Housing (Nov 2012) section 6.1	Social Infrastructure	Obj.9 Policy CF1 Paras. 3.41-3.42; 8.48; 10.14	D1; D2		5	SC7	12	<ul style="list-style-type: none"> • LBHF 3rd Sector Strategy (2009)

Appendix 3 Infrastructure Schedule

Provided as a separate document

Appendix 4 Draft R123 List

Column A: Draft R123 List

The council intends that it will or may spend CIL on part or all of the cost of provision, improvement, replacement, operation or maintenance of the following infrastructure facilities, as listed in **Column A**, to support development in the borough. The list is alphabetical by category. Inclusion of items in the R123 List does not imply priority, or that the council will spend CIL on every item, or not spend CIL on other unlisted items.

There are a number of exceptions to the R123 List where the council intends to negotiate S106 obligations to secure provision of infrastructure as defined in the Planning Act 2008. In general, this is where that infrastructure is required to make a specific development proposal acceptable. In some cases, the infrastructure is or may be required to be jointly funded by a number of developments in an area, in which case there can be no more than five contributing planning obligations.

Column B: Draft potential future S106 & S278 List (or possibly Neighbourhood CIL)

When CIL is brought into effect in the borough, the council still intends to negotiate S106 obligations and S278 agreements (for highway works) where necessary and appropriate to mitigate the local impact of developments and to make them acceptable. Such S106s could include provision for affordable housing, infrastructure not included within the R123 List, infrastructure items specifically excluded from the R123 List, and other purposes (which may or may not be defined as infrastructure). **Column B** lists examples of items that could typically be the subject of S106s or S278s. The list is not exclusive and obligations or agreements may be sought for other purposes that are appropriate to particular sites.

The items listed in Column B may also be funded by Neighbourhood CIL appropriate. Neighbourhood CIL can be spent on infrastructure or anything else that is concerned with addressing the demands that development places on an area. CIL Regulations do not require the Neighbourhood CIL to be detailed in the R123 List.

Infrastructure Category & Sub-Category		Column A Draft R123 List	Column B Draft potential future S106 & S278 List (or possibly part of Neighbourhood CIL)
ASC	Health	<ul style="list-style-type: none"> Primary healthcare and out of hospital care team facilities 	
CS	Early Years, Schools, Youth	<ul style="list-style-type: none"> Primary, secondary and special education and youth facilities. 	<ul style="list-style-type: none"> Early years (nursery) contributions Youth outreach contributions
ELRS	Community Safety	<ul style="list-style-type: none"> Community safety facilities (including local policing facilities) Public realm CCTV infrastructure 	<ul style="list-style-type: none"> Enhanced policing contributions CCTV within a development scheme and connections to the council's system
	Leisure & Parks	<ul style="list-style-type: none"> Public leisure facilities including parks and other public open space, outdoor sports pitches, courts and greens, play and other spaces for children and teenagers, swimming pools, gyms and indoor sports halls, allotments and Linford Christie Stadium 	<ul style="list-style-type: none"> Provision of public open space or play areas within a development scheme required to comply with a policy of the Development Plan
	Biodiversity		<ul style="list-style-type: none"> On-site provision, maintenance or improvement of nature conservation areas and green corridors to comply with a policy of the Development Plan
	Waste & Street Enforcement	<ul style="list-style-type: none"> Household and public waste recycling and waste management facilities 	<ul style="list-style-type: none"> Provision of on-site facilities and bins on the highway required to service a specific development proposal
FCG	Community Investment	<ul style="list-style-type: none"> Community facilities including community centres, voluntary sector meeting places and centres, and public cultural facilities 	
HR	Economic Development, Adult Learning & Skills	<ul style="list-style-type: none"> Learning and training facilities, job shops, business hubs/incubators 	<ul style="list-style-type: none"> Employment, training and workplace coordinators, business engagement services, business procurement
LA	Libraries & Archives	<ul style="list-style-type: none"> Libraries and archives 	
TTS	Energy		<ul style="list-style-type: none"> Decentralised energy networks Carbon reduction & energy efficiency (e.g. boiler insulation, LED lights)
	Environmental Health	<ul style="list-style-type: none"> Air quality, noise and contaminated land monitoring infrastructure 	<ul style="list-style-type: none"> On-site air quality monitoring infrastructure required to assess or help mitigate a development proposal Air quality monitoring costs On-site contaminated land mitigation On-site noise reduction measures and infrastructure Noise monitoring costs

Infrastructure Category & Sub-Category	Column A Draft R123 List	Column B Draft potential future S106 & S278 List (or possibly part of Neighbourhood CIL)	
	Drainage & Flooding	<ul style="list-style-type: none"> Flood mitigation and defences. Borough Sustainable Urban Drainage Systems (SUDS) 	<ul style="list-style-type: none"> Works required to mitigate flood risk to a specific development (including on-site Sustainable Urban Drainage Systems (SUDS)) (considered alongside SUDS Approval Body arrangements), or works to the Thames Wall where the responsibility lies with a riparian landowner
	Highways & Transport	<ul style="list-style-type: none"> Transportation infrastructure for walking, cycling, public transport and highways; excluding measures for highways & transport listed in column B. 	<ul style="list-style-type: none"> Provision of new or enhanced access from the highway or public transport facilities to a development site. (S106 &/or S278) Highway measures necessary to directly mitigate the impact of particular development proposals. (S106 &/or S278) Provision, relocation, replacement or improvement of pedestrian cycle and bus facilities on-site or in the highways immediately surrounding the site (S106 &/or S278) Changes to, or introduction of, local traffic management or controlled parking (S106 &/or S278) Removal, relocation or replacement of street furniture, dropped kerbs, crossovers, street trees (S106 &/or S278) Bus service contributions River bus service contributions Provision or enhancement of the Thames Path or canal path, and access to the river or canal. Provision of electric car charging parking spaces within a development scheme to comply with a policy of the Development Plan Car club contributions
	Environmental Improvements	<ul style="list-style-type: none"> Environmental improvements to enhance the appearance, safety and security of the public realm, especially in town centres. 	<ul style="list-style-type: none"> Action related to the public realm provided within a development site, or action in the area surrounding a site to mitigate the impact of development.

Infrastructure which is excluded from the R123 List (Column A) and for which provision will be made by means of S106 obligations or S278 agreements (Column B)

- For development in **White City East**: the essential mitigation infrastructure listed in the WCOAPF SPD (and DIFS) and any other infrastructure required to make development in the White City East area acceptable in accordance with Core Strategy Strategic Policy WCOA and Strategic Site WCOA 1.
- For development in the **Earls Court & West Kensington Opportunity Area**: any infrastructure necessary to comply with the Phasing & S106 Strategy set out in the ECWK SPD or which is otherwise required to make a development acceptable in accordance with Core Strategy Strategic Policy FRA and Strategic Site FRA 1 (Opportunity Area).
- For the provision of the northern link road through the National Grid site as required by the **South Fulham Riverside** SPD and any necessary other works to mitigate the development of that site including but not limited to any necessary works within Highways Package 2 as defined by the SFR DIFS.
- An item of infrastructure (or the improvement, replacement, operation or maintenance of any infrastructure) that is specifically required to make a planning application acceptable (subject to there being no more than 5 planning obligations (already entered into since April 2010) for that item at the time).
- Provision of on-site accommodation for infrastructure purposes where the cost of occupation is met from sources external to the development (e.g. occupation on commercial terms).
- Replacement of any existing infrastructure facility that is proposed as part of a development proposal.
- Provision of infrastructure which is required to ensure compliance by a development with a policy of the Development Plan and any relevant SPDs which specifically requires provision on the relevant site.

Appendix 5 Viability Study

Provided as a separate document

Appendix 6 Neighbouring Authorities' Residential CIL Charge Rates



Indicative only. Based on below table as at June 2014. Reference should be made to respective authorities' established and emerging CIL Charging Schedules in the first instance for precise boundaries and up-to-date rates. See section 4.5.

Borough	Latest stage in CIL charge-setting (as known at June 2014)	
Kensington & Chelsea	June 2014	Examination Hearing
Wandsworth	November 2012	In Effect
Richmond-upon-Thames	March 2014	Examiner's Report
Hounslow	March 2014	Preliminary Draft Charging Schedule
Ealing	March 2014	Preliminary Draft Charging Schedule
Brent	July 2013	In Effect

Appendix 7 Equalities Impact Assessment (EqIA)

Provided as a separate document

Appendix 8 PDCS Reps & Council Responses

Provided as a separate document

Appendix 9 PDCS Reps & Council Responses: Summary

Topic	Issue	Summary	Response
A. Charging Zones	Charging Zones	<p>Should be a differential Charging Zones for Fulham Regeneration Area</p> <p>Stamford Bridge Stadium should be within the Central Zone</p>	<p>There is no evidence to suggest that a separate charge for Fulham Regeneration Area is required.</p> <p>If any development proposals came forward, it is considered that residential values would have more in common with the area south of Fulham Road. The Stadium is physically separated from the Central Zone by the District Line.</p>
A. Charging Zones	Earls Court West Kensington: differential rates	Various comments that Earls Court & West Kensington should be dealt with differently from other strategic sites and should use viability evidence more like the SPD viability study.	Agreed that it is more appropriate to deal with Earls Court & West Kensington as a separate strategic site having regard to the DVS SPD Viability Study 'DIFS'.
B. Appraisal methodology	Affordable housing	Comments doubt the ability to secure 40% affordable housing as well as infrastructure contributions though CIL.	<p>The Viability Study appraisals are based on achieving 40% affordable housing in accordance with policy. If individual sites are shown to have reasons why they are not viable at those proportions of affordable housing, the policy allows the proportion to be varied to achieve viability.</p> <p>In general, the proposed CIL contributions would be equivalent to a very small proportion of GDV and unlikely to affect overall scheme viability, or significantly affect the proportion of affordable housing.</p>
B. Appraisal methodology	CIL as a proportion of overage	Queries how the appropriate level of CIL in comparison to overage has been decided.	The overage /m ² of total development is the surplus on the appraisal, being the difference between residual land value and the benchmark land value. The ability of the development to pay CIL at any particular level is assessed against the overage allowing for the possibility that the overage may also be required (in a particular case) to fund S106 contributions (over the £1,000/private residential unit allowance in the appraisals), abnormal costs not taken into account in the actual land price paid, variations to costs in particular schemes and a further incentive to the landowner to release land. Given the uncertainties surrounding viability appraisal, the overage is of course an approximate indicator, which should be used cautiously. A formula is not applied to arrive at an appropriate level of CIL charge, a judgement is made based on the overage.
B. Appraisal methodology	S106 costs	Various comments relating to the treatment of remaining site specific S106 costs, and the extent of those costs (in particular in South Fulham Riverside).	<p>In the appraisals, a general allowance of £1,000/private residential unit has been included for relatively minor S106 costs. It is not assumed that all residential sites will actually pay this rate as that will depend on the circumstances of the scheme and meeting the legal tests.</p> <p>The Viability Study methodology assumes that any additional S106 costs for residential or commercial development will be met from within the overage within which there is considerable headroom above the CIL charge.</p>

Topic	Issue	Summary	Response
B. Appraisal methodology	S106 costs in relation to previous schemes	Proposed CIL rates should be compared with recent S106 obligations.	This is reported in paragraphs 4.2.17-18 and Figure 4.4 of the DCS Consultation Document.
C. Appraisal site typologies	Earls Court West Kensington cross boundary issues	Viability assessment of Earls Court & West Kensington should be cross-boundary rather than based separately on the two boroughs.	The Viability Study's appraisal for Earls Court & West Kensington is based on the whole SPD area which includes both boroughs.
C. Appraisal site typologies	Large & strategic sites	The CIL viability appraisals should include assessment of large sites and strategic sites. Sample mixed use quantum proposed for large sites broadly representative but site areas relatively small. Single use sites not appropriate.	The Viability Study has an expanded range of sample sites that includes two large mixed use schemes in each Charging Zone, together with an appraisal for the whole of the Earls Court & West Kensington SPD area.
C. Appraisal site typologies	Mixed uses	Need to consider mixed use appraisals	The Viability Study includes mixed use appraisals.
C. Appraisal site typologies	Retail appraisals insufficient	Lack of evidence with only two appraisals	Sampling is appropriate at borough level and is representative of local market conditions.
C. Appraisal assumptions	Evidence	Lack of evidence to justify rates	Further evidence is provided in the Viability Study, including within its Appendix A.
D. Appraisal assumptions	Abnormals	Abnormal costs are not taken into account in appraisals	Abnormal costs will clearly vary from site to site and it is not feasible to assess these for CIL viability appraisals. The Viability Study methodology presumes that abnormal costs would be reflected in the land costs. This is because developers seeking to purchase sites would expect the land owners' price paid to be reduced to take account of abnormal costs in making the site available for development. Therefore, the actual land price would be expected to be less than the Benchmark Land Value adopted by the Viability Study. If the land price could not absorb abnormal costs, the Viability Study methodology allows scope for such costs to be absorbed from within the viability overage, since only a small proportion would be required to pay for CIL.
D. Appraisal assumptions	Benchmark Land Values	Some comments querying proposed BLVs in different parts of the borough, for different commercial uses and in White City. However, no alternative values were suggested.	The approach to setting benchmark land values is explained in Appendix A of the Viability Study.

Topic	Issue	Summary	Response
D. Appraisal assumptions	Build costs	Build costs are too low. BCIS rates are not reflective of site constraints and premium rates in London	Build costs have been reviewed in the Viability Study. The approach to cost figures is explained in Appendix A of the Study. Residential build costs are based upon industry data from the Build Cost Information Service (BCIS) which is produced by the Royal Institution of Chartered Surveyors (RICS). BCIS offers a range of prices dependent on the final specification. For flats upper quartile rates for 6+ storey development have been used whilst assumptions for houses also use upper quartile rates.
D. Appraisal assumptions	Demolition costs	Demolition costs should be included in appraisals at £100-200k	It would be expected that demolition costs would be reflected in the price paid for development sites so that they could cost less than the benchmark land value. This approach was taken in the White City DIFS.
D. Appraisal assumptions	External works	One comment was that 5% was a reasonable allowance; another that it is insufficient (should be typically 8-15%)	5% is considered to be a satisfactory estimate for CIL purposes.
D. Appraisal assumptions	Finance costs	Two comments that 7% is appropriate. another that it should be 8% for smaller developers	7% is considered to satisfactorily reflect market rates for CIL purposes.
D. Appraisal assumptions	Floorspaces	Some queries concerning the average dwelling size (one considered assumption was low) and commercial mix (no suggested alternative)	The floorspace figures are considered to be suitable for CIL purposes.
D. Appraisal assumptions	Land values and acquisition costs	Benchmark Land Values are too low for White City. Other comments query the source of the figures	The figure for White City East has been increased in the Viability Study. The approach to benchmark land values is explained in Appendix A of the Viability Study.
D. Appraisal assumptions	Marketing costs	Marketing costs too low	Marketing costs are included within the revised financial model at £1,000 per private residential unit which is a recognised industry standard
D. Appraisal assumptions	Phasing	Build periods for 500 and 750 homes are too short and sales rates too high. Other comments that build cash flows look reasonable.	The phasing periods have been reviewed and, as used for the Viability Study, are considered to be acceptable.
D. Appraisal assumptions	Professional fees	Should be higher at 12-12.5%.	Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs at 10% which has been increased from the figure of 8% used at the PDCS stage.
D. Appraisal assumptions	Profit	Two suggested that Internal Rate of Return (IRR) is more appropriate; one that profit should be on GDV; one that CIL would erode profit too much	20% on costs is considered to be a reasonable level for CIL viability testing.
D. Appraisal assumptions	Residential values	Residential values too high in South Zone	Residential values in the South Zone have been reviewed and are considered to be acceptable.
D. Appraisal assumptions	Sensitivity testing	Sensitivity testing should be carried out	Proposed charge rates are not set at a level that would absorb all the overage so are still capable of being viable, even when market sensitivities are tested.

Topic	Issue	Summary	Response
D. Appraisal assumptions	White City DIFS	The DIFS should be taken into account	The DIFS has been published with the White City Opportunity Area Planning Framework. It has been referred to in preparing the Viability Study for CIL purposes.
E. CIL charges	Affordable housing relief	Relief should be given for Pocket Homes product.	Amendments to the CIL Regulations in February 2014 allow the council to introduce discretionary social housing relief for accommodation that will, if sold, continue to be available to future purchasers at 80% of market price. If the council introduces such relief Pocket Homes would need to show that it meets the criteria.
E. CIL charges	CIL charge	£400/m ² residential charge and £80/m ² for other uses is too high in South Zone; £200/m ² too high in Central Zone. North Zone development is unable to support CIL. Charge and should be more equal to the Mayor of London's CIL charge.	No change proposed. There is sufficient coverage for a CIL rate of £400 per square metre to be charged without threatening the viability of development.
E. CIL charges	Other uses	Fire-stations, police facilities, football stadiums, hotels, D1, should have nil charges	A reduced nil charge for hotels is proposed.
F. CIL policies	Instalments policy	There should be an instalments policy	The council currently does not expect that it will introduce its own Instalment Policy. Therefore, the Mayor of London's CIL Instalment Policy will apply to Mayoral and borough CIL payments.
F. CIL policies	Policy for exceptional circumstances	There should be a policy to allow relief in exceptional circumstances	The council currently does not expect that it will introduce a Discretionary Exceptional Circumstances Relief policy and considers that the proposed charge rates are viable. However, if evidence emerges that such a policy should be introduced, the council will review its position.
G. Other	Park Royal/Old Oak	Potential CIL income from the Park Royal Opportunity Area should be included in the calculation of CIL income	The council and GLA are working to secure major regeneration of the Old Oak sidings area but the details are not yet included within the London Plan or the Local Plan. It is premature, therefore, to consider the implications for the current CIL proposals.

Appendix 10 Notice & Statement of the Representations Procedure

London Borough of Hammersmith & Fulham

Community Infrastructure Levy (CIL) Regulations 2010 (as amended) Regulation 16: Publication of a Draft Charging Schedule

STATEMENT REGARDING THE AVAILABILITY FOR INSPECTION OF A DRAFT CHARGING SCHEDULE AND RELEVANT EVIDENCE

The London Borough of Hammersmith & Fulham, as a Charging Authority, intends to submit a Draft Charging Schedule (DCS) for examination in accordance with section 212 of the Planning Act 2008 (as amended). As required in the CIL Regulations 2010 (as amended), the council is inviting representations on the Draft Charging Schedule and its supporting evidence.

The council is also inviting representations on the following related matters which it will consider separately from the Draft Charging Schedule examination:

- The infrastructure projects or types of infrastructure that the council intends will be, or may be, wholly or partly funded by CIL (other than CIL to which Regulation 59 applies). These are set out in the Draft Regulation 123 list which forms part of the evidence for the Draft Charging Schedule but is not subject to detailed consideration at the Draft Charging Schedule examination.
- Suggestions for 'Neighbourhood CIL', that is, infrastructure projects or types of infrastructure or anything else that is concerned with addressing the demands that development places on an area and which may be wholly or partly funded by CIL to which Regulation 59 applies. See section 3.3 of the Consultation Document.
- Equalities Impact Assessment (EqIA) for the CIL Draft Charging Schedule.

Period for Consultation

Friday 22nd August 2014 until 5:00 pm on Friday 3rd October 2014.

Please note that in accordance with Regulation 17(2)(a), representations on the Draft Charging Schedule and its supporting evidence must be made within this period.

Documents available for inspection

- Draft Charging Schedule (DCS)
- Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS) Consultation Document, containing evidence to support the Draft Charging Schedule, including appendices:
 - Appendix 3 Infrastructure Schedule
 - Appendix 4 Draft R123 List
 - Appendix 5 Viability Study (Peter Brett Associates: April 2014)
 - Appendix 7 Equalities Impact Assessment (EqIA) (not forming part of the Draft Charging Schedule evidence)

Places where documents are available for inspection

Website	www.lbhf.gov.uk/cil
Libraries	Reference-only copies are available from: Askew Road Library Avonmore Library Fulham Library Hammersmith Library Hurlingham and Chelsea School and Community Library Shepherds Bush Library For details and opening hours, please see: www.lbhf.gov.uk/libraries
Hammersmith Town Hall Extension	Reference-only copies are available from: First Floor, Hammersmith Town Hall Extension, King Street, Hammersmith, London W6 9JU For details and opening hours, please see: www.lbhf.gov.uk/planning > Planning Applications > Advice > Duty Planner Service

STATEMENT OF THE REPRESENTATIONS PROCEDURE

Representations must be submitted electronically by email or made in writing by post to:

Email: cil@lbhf.gov.uk

Post:

Siddhartha Jha
 CIL Draft Charging Schedule Consultation
 Development Plans Team
 Planning Division
 Transport & Technical Services
 Hammersmith & Fulham Council
 5th Floor Town Hall Extension
 King Street
 Hammersmith
 London
 W6 9JU

Representations should make clear which matters, sections and documents are being commented on. A consultation response form is available on our website (www.lbhf.gov.uk/cil) to assist you in providing a response or is available on request from the address above.

All representations made regarding the Draft Charging Schedule and its supporting evidence, in accordance with Regulation 17, will be submitted to the independent examiner.

Any person making representations regarding the Draft Charging Schedule and its supporting evidence may request the right to be heard by the examiner. Such requests must be made by the end of the consultation period.

Representations on the Draft Charging Schedule and its supporting evidence may be accompanied by a request to be notified at a specified address of any of the following:

- (i) that the draft charging schedule has been submitted to the examiner in accordance with section 212 of the Planning Act 2008,
- (ii) the publication of the recommendations of the examiner and the reasons for those recommendations, and
- (iii) the approval of the charging schedule by the charging authority.

Any person who has made representations about a draft charging schedule may withdraw those representations at any time by giving notice in writing to the council by email or post to the address above.

All representations made concerning related matters (i.e. the items included on the Draft R123 list, 'Neighbourhood CIL', or the EqIA) will be considered separately by the council.

For further information please email cil@lbhf.gov.uk, call 0208 753 7032 or write to the council's office at the address above.

Appendix 11 Consultation Response Form

Contact details

Name	
Position	
Organisation If relevant	
Agency If making comments on behalf of an organisation	
Postal address	
Postcode	
Email address	
Telephone number	
I am making comments on... Please check all boxes that apply	<input type="checkbox"/> The Draft Charging Schedule & supporting evidence base – Form A <input type="checkbox"/> Neighbourhood CIL suggestions – Form B <input type="checkbox"/> The Equalities Impact Assessment (EqIA) – Form C

Please return your completed form either by email to cil@lbhf.gov.uk or by post to **Sid Jha, CIL Draft Charging Schedule Consultation, Development Plans Team, Planning Division, Transport & Technical Services, Hammersmith & Fulham Council, 5th Floor, Town Hall Extension, King Street, Hammersmith, London W6 9JU**. Representations must be received by the council by **5pm on Friday 3rd October 2014**.

Other documents are available at www.lbhf.gov.uk/cil.

Form A: Comments on the Draft Charging Schedule & supporting evidence base

Please use this form to make comments on the **Draft Charging Schedule** or the supporting evidence contained within this Consultation Document (Sections 2-4) and the relevant appendices (3: **Infrastructure Schedule**; 4: **Draft R123 List**; 5: **Viability Study**).

All such representations will be submitted to an independent examiner as part of the independent public examination and will be made publicly available for inspection on the council’s website and other locations. Please note that although comments on the content of the Draft R123 List will be submitted to the examiner for information, it is not for the examination to challenge the list. The council will, however, consider all such comments separately.

I request the right to be heard by an examiner upon examination of the Draft Charging Schedule This request must be made before the end of the consultation period	<input type="checkbox"/>
I request to be notified that the Draft Charging Schedule has been submitted to the examiner in accordance with section 212 of the Planning Act 2008	<input type="checkbox"/>
I request to be notified of the publication of the recommendations of the examiner and the reasons for those recommendations	<input type="checkbox"/>
I request to be notified of the approval of the charging schedule by the charging authority	<input type="checkbox"/>
If any of the above requests are made, I confirm that the contact details for notification are set out in the contact details section (previous page)	<input type="checkbox"/>

Document or Appendix	Section, Paragraph or Ref #	Comment

Document or Appendix	Section, Paragraph or Ref #	Comment

Please continue on separate sheets as necessary

Form B: Neighbourhood CIL suggestions

Please use this form to make suggestions for use of potential Neighbourhood CIL monies.

Please read section 3.3 and Appendix 3 Infrastructure Schedule before completing.

These representations will not be submitted to an independent examiner as they will not be part of the independent public examination. A summary of the representations will be made publicly available for inspection on the council's website.

We would like to know if you think any of the infrastructure sub-categories and schemes listed in the Infrastructure Schedule (Appendix 3, summarised below), are particularly appropriate for spending Neighbourhood CIL. Please tick the sub-category(/ies) and write in the relevant references (#s) of schemes you support.

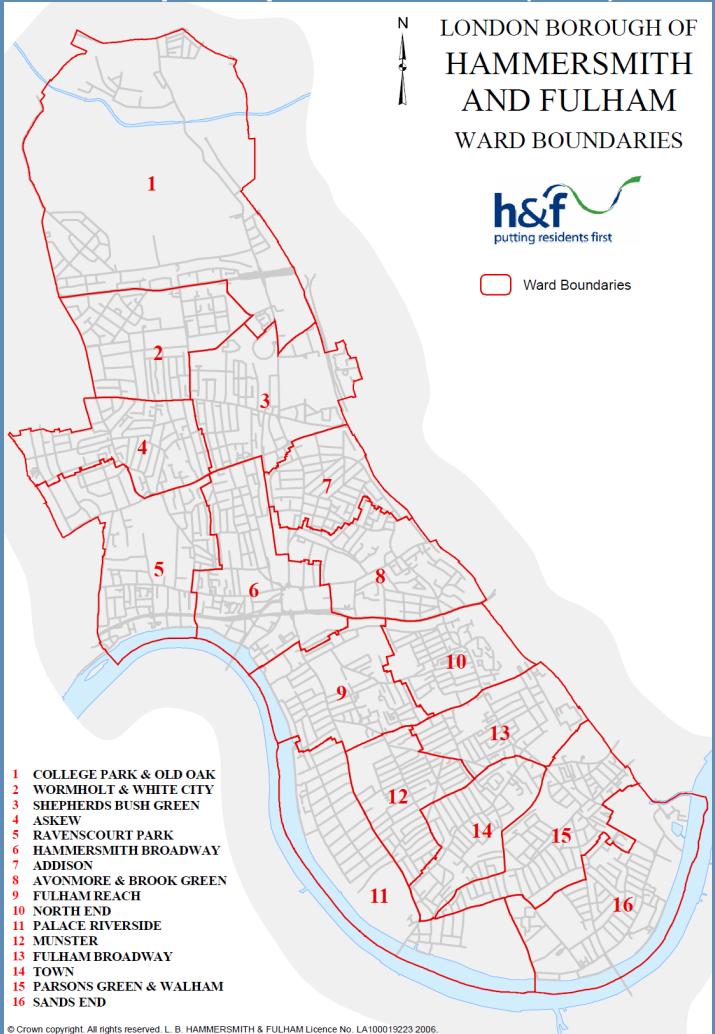
Sub-Category	Ref # of particular schemes you support
Adult Social Care <input type="checkbox"/>	ASC...
Health <input type="checkbox"/>	ASC...
Early Years <input type="checkbox"/>	CS...
Schools <input type="checkbox"/>	CS...
Youth <input type="checkbox"/>	CS...
Culture <input type="checkbox"/>	ELRS...
Community Safety <input type="checkbox"/>	ELRS...
Emergency Services <input type="checkbox"/>	ELRS...
Leisure <input type="checkbox"/>	ELRS...
Parks <input type="checkbox"/>	ELRS...
Waste & Street Enforcement <input type="checkbox"/>	ELRS...
Community Investment <input type="checkbox"/>	FCG...
Housing & Regeneration <input type="checkbox"/>	HR...
Economic Development, Adult Learning & Skills <input type="checkbox"/>	HR...
Libraries & Archives <input type="checkbox"/>	LA...
Energy <input type="checkbox"/>	TTS...
Environmental Health <input type="checkbox"/>	TTS...
Drainage & Flooding <input type="checkbox"/>	TTS...
Highways <input type="checkbox"/>	TTS...
Transport <input type="checkbox"/>	TTS...

Please put forward any other suggestions for spending Neighbourhood CIL to address demands placed on an area by development

Description of your suggestion

How does the suggestion address demands that development places on an area?

The suggestion helps address demands that development places on which (ward) area?



- 1. College Park & Old Oak
- 2. Wormholt & White City
- 3. Shepherds Bush Green
- 4. Askew
- 5. Ravenscourt Park
- 6. Hammersmith Broadway
- 7. Addison
- 8. Avonmore & Brook Green
- 9. Fulham Reach
- 10. North End
- 11. Palace Riverside
- 12. Munster
- 13. Fulham Broadway
- 14. Town
- 15. Parsons Green & Walham
- 16. Sands End

Larger ward maps are available in Appendix 12

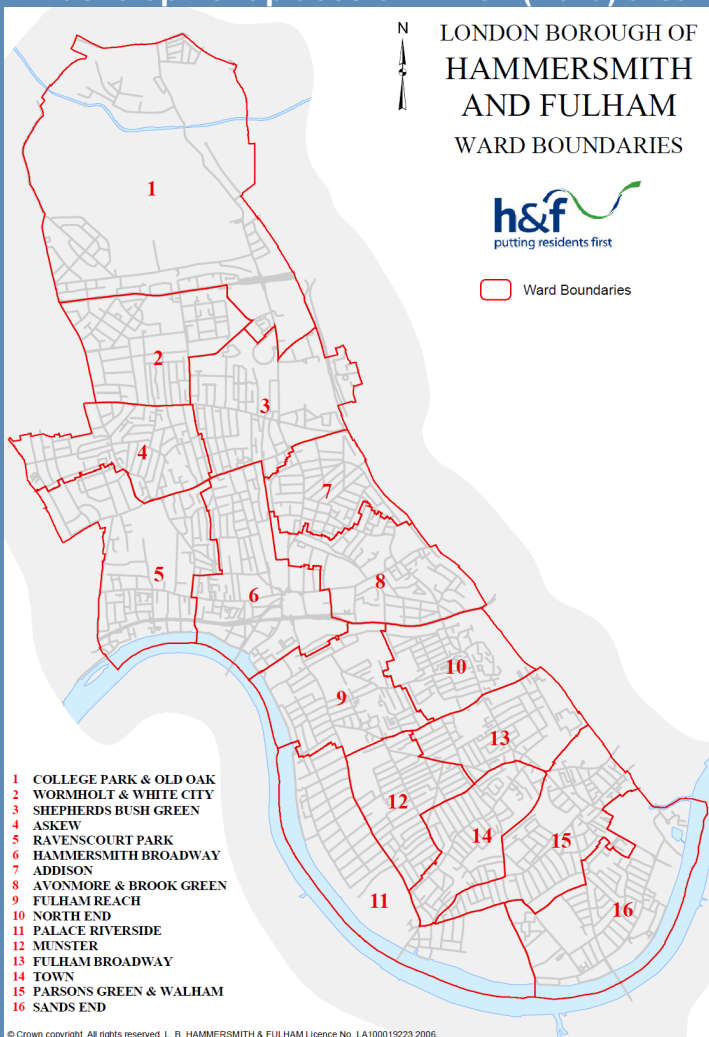
What other information, if any, can you provide on your suggestion?
E.g. other organisations involved, estimated costs (£), other committed or possible funding

Please put forward any other suggestions for spending Neighbourhood CIL to address demands placed on an area by development

Description of your suggestion

How does the suggestion address demands that development places on an area?

The suggestion helps address demands that development places on which (ward) area?



- 1. College Park & Old Oak
- 2. Wormholt & White City
- 3. Shepherds Bush Green
- 4. Askew
- 5. Ravenscourt Park
- 6. Hammersmith Broadway
- 7. Addison
- 8. Avonmore & Brook Green
- 9. Fulham Reach
- 10. North End
- 11. Palace Riverside
- 12. Munster
- 13. Fulham Broadway
- 14. Town
- 15. Parsons Green & Walham
- 16. Sands End

Larger ward maps are available in Appendix 12

What other information, if any, can you provide on your suggestion?

E.g. other organisations involved, estimated costs (£), other committed or possible funding

Please continue on separate sheets as necessary

Form C: Comments on the Equalities Impact Assessment (EqIA)

Please use this form to make comments relating to the **Equalities Impact Assessment (EqIA)** (section 5.10 / Appendix 7 EqIA).

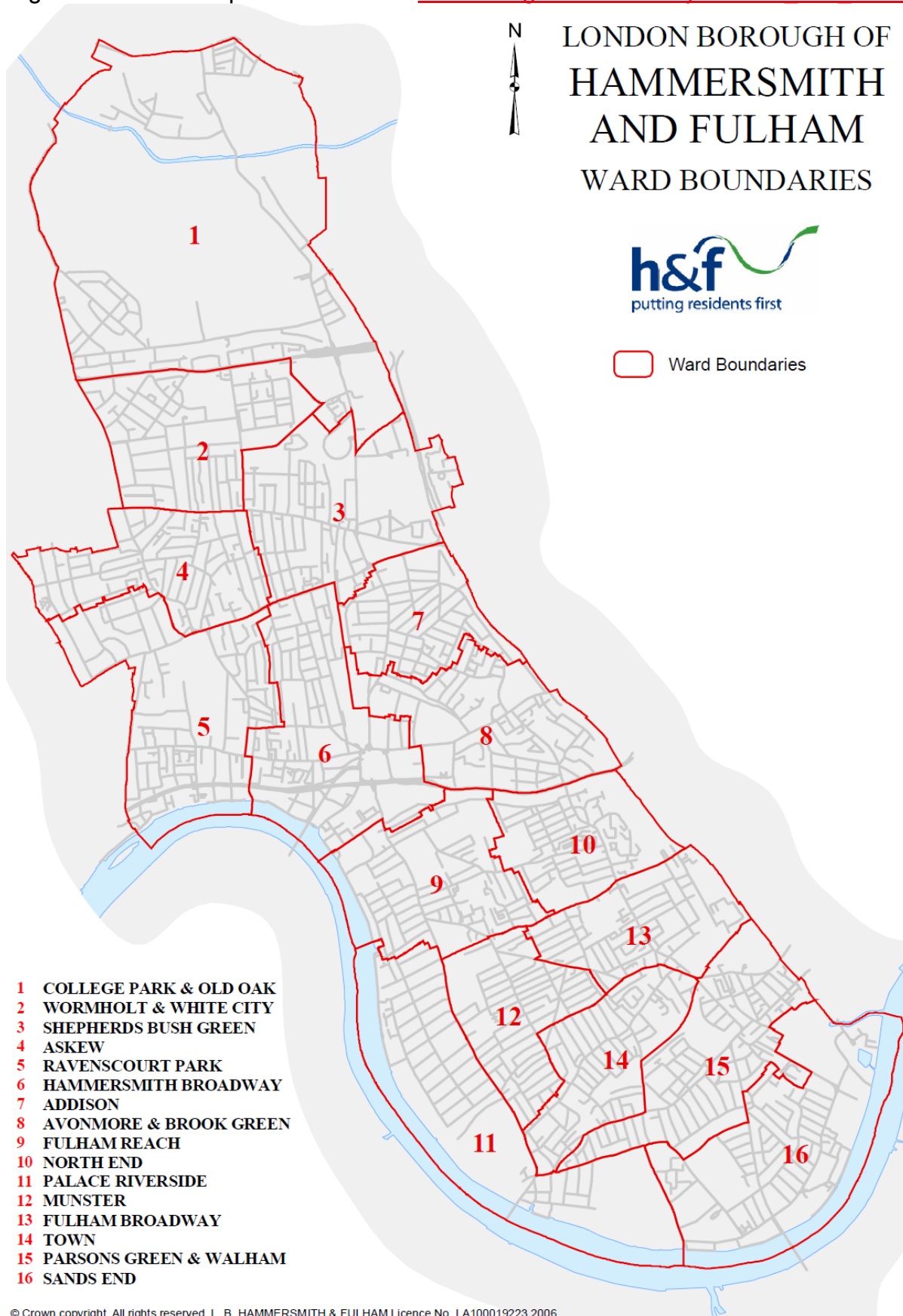
These representations will not be submitted to an independent examiner as they will not be part of the independent public examination. A summary of the representations will be made publicly available for inspection on the council's website.

Document or Appendix	Section or Page #	Comment
Appendix 7 EqIA		
Appendix 7 EqIA		
Appendix 7 EqIA		

Please continue on separate sheets as necessary

Appendix 12 Ward Maps

Higher resolution maps available from [www.lbhf.gov.uk/Directory/Council and Democracy](http://www.lbhf.gov.uk/Directory/Council%20and%20Democracy)



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Appendix 3 Infrastructure Schedule (Draft)

Ref #	Sub-Category	Scheme	Description	Core Strategy	CIL PDCS	WC / SFR/DIFS	Regen. Area	Other Agencies / Funding Sources	First Year £ Needed	Year Complete	Costs			Assumed / Committed Funding			Funding Gap	Proposed mechanism CIL S106 Site
											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106		
Adult Social Care																		
ASC 1	Adult Social Care	Learning Disabilities Day Centre	Potential re-provision of services for adults aged 18-64 with learning disabilities (many of whom have additional physical disabilities, autism, challenging behaviour, and other needs) from 280 Goldhawk Road joint with RBKC on a site close to LBHF/RBKC boundary in the north. A total internal floor area of 318m2 is required, including accessible toilet and changing room space and kitchens. Additional secure garden/courtyard space of 62m2 is also required. The site will require wheelchair accessible parking or a drop-off point for mini-buses with tail lifts. Costs to be identified.	New	New	-	Borough	RBKC	2014	2016	£0	£0	£0	£0	£0	£0	£0	-
ASC 2	Health	Milson Road	Sterndale Practice/Brook Green Practice re-provision	New	H5	-	Borough	H&F Clinical Commissioning Group	2014	2016	£2,938,060	£0	£2,938,060	£1,900,000	£0	£1,900,000	£1,038,060	R123 CIL
ASC 3	Health	Richford Gate Medical Practice	GP Premises grant and rent and additional rent reimbursement.	37	H6	-	Borough	H&F Clinical Commissioning Group	2014	2016	£1,420,000	£0	£1,420,000	£1,420,000	£0	£1,420,000	£0	-
ASC 4	Health	North End Road Centre for Health	Relocate GP as part of social housing redevelopment. Will not provide net increase. Costs to be identified.	39	H7	-	Fulham (inc. Earls Court)	H&F Clinical Commissioning Group	2013	2016	£0	£0	£0	£0	£0	£0	£0	-
ASC 5	Health	White City Collaborative Care Centre	Relocate 4 GP practices plus community use to improve integration between health services and health and social services on site of former Janet Adegoko Centre, Bloemfontein Road.	34	H8	-	White City	H&F Clinical Commissioning Group LIFTCo Financial Model	2013	2016	£10,200,000	£0	£10,200,000	£10,200,000	£0	£10,200,000	£0	-
ASC 6	Health	Bush Doctors	Relocate current Bush Doctors in West 12 shopping centre. Will not provide net increase. Third party development.	39	H9	-	White City	H&F Clinical Commissioning Group	2014	2016	£1,500,000	£0	£1,500,000	£1,000,000	£0	£1,000,000	£500,000	R123 CIL
ASC 7	Health	Health & Wellbeing Centre White City	Provide 5 GPs. Allowance for a GP -led H&W Centre with 820 m2 GIA @ £2,000 m2 (updated to 3,583 m2).	39	H10	WC13	White City	H&F Clinical Commissioning Group	2017	2021	£2,938,060	£0	£2,938,060	£0	£1,200,000	£1,200,000	£1,738,060	S106
ASC 8	Health	Health & Wellbeing Centre South Fulham Riverside	Expansion of local services at Sands End Clinic (formerly Bridge House Centre).	39	H11	SF7	South Fulham	H&F Clinical Commissioning Group	2014	2021	£4,034,448	£0	£4,034,448	£0	£0	£0	£4,034,448	R123 CIL
ASC 9	Health	Health & Wellbeing Centre Earls Court	Provide integrated health and wellbeing facility fully fitted-out and equipped to an agreed specification providing a floor area of 2,018sqm.	39	H12	-	Fulham (inc. Earls Court)	H&F Clinical Commissioning Group	2017	2021	£7,914,596	£0	£7,914,596	£0	£4,274,980	£4,274,980	£3,639,616	S106
ASC 10	Health	Health & Wellbeing Centre Earls Court	Contribution to improved health and wellbeing	39	H13	-	Fulham (inc. Earls Court)	H&F Clinical Commissioning Group	2013	2021	£744,000	£0	£744,000	£0	£744,000	£744,000	£0	S106
ASC 11	Health	Imperial College Healthcare NHS Trust estates	Provide facilities based on NWL NHS's 'Shaping a Healthier Future', subsequent service modelling and estates strategy (2014+). Schemes TBC. Costs to be identified.	33	H14	-	Borough	Imperial College Healthcare NHS Trust	2013	2031	£0	£0	£0	£0	£0	£0	£0	-

2 LB Hammersmith Fulham Infrastructure Schedule (Draft) – August 2014

Ref #	Sub-Category	Scheme	Description	Core Strategy	CIL PDCS	WC / SFR/DIFS	Regen. Area	Other Agencies / Funding Sources	First Year £ Needed	Year Complete	Costs			Assumed / Committed Funding			Funding Gap	Proposed mechanism CIL S106 Site	
											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106			Total
Children's Services																			
CS 1	Early Years	Nurseries White City	Contribution to ensure affordable access to pre-school childcare through subsidised places.	32	ED1	WC10	White City	Providers	2022	2031	£0	£60,000	15	£900,000	£0	£300,000	£300,000	£600,000	S106
CS 2	Early Years	Nurseries Earls Court Main Site	Provision of nursery space on-site	32	ED3	-	Fulham (inc. Earls Court)	Providers	2014	2031	£705,000	£0		£705,000	£0	£705,000	£705,000	£0	S106
CS 3	Early Years	Nurseries Earls Court Seagrave Road	£520,000 agreed as part of Seagrave Road S106 for nursery (and primary) education within the catchment area of the development. Remainder TBC from main site.	32	ED4	-	Fulham (inc. Earls Court)	Providers	2014	2031	£520,000	£0		£520,000	£0	£520,000	£520,000	£0	S106
CS 4	Early Years	Nurseries South Fulham	Contribution to ensure affordable access to pre-school childcare through subsidised places (equivalent provision of 3 nurseries for 0-4 year olds).	32	ED2	SF4	South Fulham	Providers	2014	2016	£3,000,000	£0		£3,000,000	£0	£1,200,000	£1,200,000	£1,800,000	S106
CS 5	Early Years	Childcare White City	Need for additional affordable childcare and childminder placements . Early Years and Commissioning represented on the Community Budgets working group.	32	New	-	White City	Providers	2014	2016	£0	£800,000	1	£800,000	£0	£0	£0	£800,000	S106
CS 6	Early Years	Childcare Normand Croft Family Centre	Childcare provision.	32	New	-	Fulham (inc. Earls Court)	Providers	2014	2016	£0	£30,000	1	£30,000	£0	£0	£0	£30,000	S106
CS 7	Early Years	Childcare South Fulham	Need for affordable childcare provision in this area with places for 2 year old funded programme. Funding would go towards start up business costs for new childcare providers.	32	New	-	South Fulham	Providers	2014	2016	£0	£200,000	1	£200,000	£0	£0	£0	£200,000	S106
CS 8	Schools - Primary	St. Thomas of Canterbury Catholic Primary School	Construct new build and refurbish to meet space requirements.	25	ED5	-	Borough		2011	2016	£1,500,000	£0		£1,500,000	£1,500,000	£0	£1,500,000	£0	-
CS 9	Schools - Primary	Old Oak Primary School	Construct new build and refurbish to expand to 2 form entries.	26	ED6	-	Borough		2012	2016	£1,500,000	£0		£1,500,000	£1,500,000	£0	£1,500,000	£0	-
CS 10	Schools - Primary	ARK Conway Primary Academy Phase 1 formerly ARK Wormholt North Hammersmith Free School	Refurbish and potentially expand former Wormholt Library to meet demand for primary school places and provide 1 form entry.	30	ED7	-	Borough	Ark Schools Education Funding Agency	2011	2016	£2,300,000	£0		£2,300,000	£2,300,000	£0	£2,300,000	£0	-
CS 11	Schools - Primary	ARK Conway Primary Academy Phase 2 formerly ARK Wormholt North Hammersmith Free School	Complete junior provision.	30	ED8	-	Borough	Ark Schools Education Funding Agency	2013	2016	£3,200,000	£0		£3,200,000	£0	£0	£0	£3,200,000	R123 CIL
CS 12	Schools - Primary	Holy Cross Catholic Primary School	Construct new build and remodel to expand to 2 forms of entry.	27	ED9	-	Borough		2012	2016	£6,500,000	£0		£6,500,000	£6,500,000	£0	£6,500,000	£0	-
CS 13	Schools - Primary	Pope John Catholic Primary School	Expand from 1FE to 2FE. Planning application 2013/00643/FUL approved on 31/07/13.	New	ED10	-	Borough	DfE	2013	2014	£5,000,000	£0		£5,000,000	£5,000,000	£0	£5,000,000	£0	-
CS 14	Schools - Primary	St. Stephens C of E Primary School	Expand from 1FE to 2FE. Planning application 2012/02208/FUL approved.	New	ED11	-	Borough	DfE	2013	2016	£5,000,000	£0		£5,000,000	£5,000,000	£0	£5,000,000	£0	-

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106			Total
CS 15	Schools - Primary	West London Free School Primary	Primary Free School on Cambridge School site, Cambridge Grove. Planning application 2013/00121/FUL approved.	New	ED12	-	Borough	West London Free School Education Funding Agency	2013	2016		£0		£0		£0	£0	£0	-
CS 16	Schools - Primary	Fulham Primary School	Improvements to Fulham Primary School, possibly including provision of new play equipment.	New	New	-	Fulham (inc. Earls Court)		2013	2016	£200,000	£0	£200,000	£0	£200,000	£200,000	£0	£0	-
CS 17	Schools - Primary	Primary School Provision White City	Provide 2FE primary school. Developments to fund 1 FE.	31	ED13	WC11	White City		2017	2021	£11,000,000	£0	£11,000,000	£7,700,000	£0	£7,700,000	£3,300,000	R123 CIL	
CS 18	Schools - Primary	Primary School Provision Earls Court Main Site	Provision of 2FE primary school for Earls Court/West Kensington regeneration area.	31	ED14	-	Fulham (inc. Earls Court)		2022	2031	£8,873,564	£0	£8,873,564	£8,873,564	£0	£8,873,564	£0	S106	
CS 19	Schools - Primary	Primary & Nursery School Provision Seagrave Road	£520k agreed as part of Seagrave Road S106 for primary (and nursery) education within the catchment area of the development. Remainder TBC from main site.	31	ED15	-	Fulham (inc. Earls Court)		2012	2031	£520,000	£0	£520,000	£520,000	£0	£520,000	£0	S106	
CS 20	Schools - Primary	Primary School Provision South Fulham	Provide 2FE Identified by South Fulham Riverside DIFS but pending further reviews of the School Organisational Strategy	31	ED16	SF2	South Fulham		2017	2021	£10,000,000	£0	£10,000,000	£5,562,845	£0	£5,562,845	£4,437,155	R123 CIL	
CS 21	Schools - Secondary	Sacred Heart Catholic High School for Girls	Provide at least 1 additional form of entry.	15	ED17	-	Borough		2017	2021	£7,500,000	£0	£7,500,000	£0	£0	£0	£7,500,000	R123 CIL	
CS 22	Schools - Secondary	Lady Margaret School	Provide at least 1 additional form of entry.	16	ED18	-	Borough		2013	2031	£4,800,000	£0	£4,800,000	£0	£0	£0	£4,800,000	R123 CIL	
CS 23	Schools - Secondary	Hammersmith Academy	Construct new secondary school to meet demand for secondary school places and provide 4 forms of entry. Opened in September 2011.	15	ED19	-	Borough	DfE Mercers Company, Information Technologists Company	2011	2016	£27,000,000	£0	£27,000,000	£27,000,000	£0	£27,000,000	£0	-	
CS 24	Schools - Secondary	West London Free School	Construct new build and refurbish to meet demand for secondary school places and provide 4 forms of entry. Planning application 2012/02503/FUL approved for Palingswick House.	19	ED20	-	Borough	West London Free School Education Funding Agency	2011	2016	£10,000,000	£0	£10,000,000	£10,000,000	£0	£10,000,000	£0	-	
CS 25	Schools - Secondary	Secondary School Provision White City	Contribution to 1FE of secondary school elsewhere	20	ED22	WC12	White City		2021	2021	£5,000,000	£0	£5,000,000	£1,700,000	£0	£1,700,000	£3,300,000	S106	
CS 26	Schools - Secondary	Secondary School Provision South Fulham Riverside	Provide additional 1FE secondary	20	ED23	SF3	South Fulham		2022	2026	£5,000,000	£0	£5,000,000	£3,170,000	£0	£3,170,000	£1,830,000	R123 CIL	

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106			Total
CS 27	Schools - Secondary	Secondary School Provision Earls Court	Provide additional 1FE secondary school.	20	ED24	-	Fulham (inc. Earls Court)		2012	2031	£3,280,000	£0	15	£3,280,000	£0	£3,280,000	£3,280,000	£0	S106
CS 28	Schools - Secondary	Secondary School Provision Earls Court	Contribution to improved secondary school provision	20	ED25	-	Fulham (inc. Earls Court)		2012	2021	£230,000	£0	10	£230,000	£0	£230,000	£230,000	£0	S106
CS 29	Schools - Secondary	Burlington Danes Academy sixth form science project with Imperial College	Joint working between Imperial College and Burlington Danes Academy to be confirmed as part of Imperial College development.	20	ED26	-	White City	Imperial College Burlington Danes Academy	2013	2016	£0	£0	3	£0	£0	£0	£0	£0	-
CS 30	Schools - Special	Queensmill School	Construct new build and refurbish to deliver objectives of Special Education Needs Review 2008. Planning application 2012/02274/FR3 approved for Haven / Askham Centre, 1 Ollgar Close / 1 Askham Road, W12 0NF. Work commenced October 2013.	23	ED27	-	Borough		2013	2014	£11,000,000	£0	2	£11,000,000	£11,000,000	£0	£11,000,000	£0	-
Environment, Leisure & Residents' Services																			
ELRS 1	Community Safety	Community Safety Hub South Fulham	MPS establish and maintain hub for Police Safer Neighbourhood Team, Anti-Social Behaviour Team, Street Outreach Team and Community Safety Team.	41	ES2	SF8	South Fulham	Metropolitan Police Service	2016	2031	£300,000	£35,000	15	£825,000	£530,000	£0	£530,000	£295,000	R123 CIL
ELRS 2	Community Safety	Community Safety Hub Earls Court	MPS establish and maintain hub for Police Safer Neighbourhood Team, Anti-Social Behaviour Team, Street Outreach Team and Community Safety Team and expand existing facilities (e.g. SNT at Fulham Police Station and CST at Clem Attlee Estate and Fulham Town Hall).	41	ES3	-	Fulham (inc. Earls Court)	Metropolitan Police Service	2016	2031	£300,000	£35,000	15	£825,000	£0	£0	£825,000	£0	R123 CIL
ELRS 3	Community Safety	Community Safety Hub Hammersmith	MPS establish and maintain hub for Police Safer Neighbourhood Team, Anti-Social Behaviour Team, Street Outreach Team and Community Safety Team and expand existing facilities.	40	ES4	-	Hammersmith	Metropolitan Police Service	2016	2031	£300,000	£35,000	15	£825,000	£0	£0	£825,000	£0	R123 CIL
ELRS 4	Community Safety	Community Safety Hub Park Royal	MPS establish and maintain hub for Police Safer Neighbourhood Team, Anti-Social Behaviour Team, Street Outreach Team and Community Safety Team.	41	ES5	-	Park Royal	Metropolitan Police Service	2016	2031	£300,000	£35,000	15	£825,000	£0	£0	£825,000	£0	Future CIL
ELRS 5	Community Safety	Enhanced Policing Year 1	Additional cost of 24/7 policing 'Safer Neighbourhood Team' in areas surrounding specific development sites. Current scheme operates in Shepherds Bush Green Ward but this would apply across the borough. 2012/13 financial year.	41	ES1	WC21 *updated	Borough	Metropolitan Police Service	2012	2013	£0	£1,575,000	1	£1,575,000	£166,666	£1,408,334	£1,575,000	£0	S106
ELRS 6	Community Safety	Enhanced Policing Year 2	Additional cost of 24/7 policing 'Safer Neighbourhood Team' in areas surrounding specific development sites. Current scheme operates in Shepherds Bush Green Ward but this would apply across the borough. 2013/14 financial year.	41	ES1	-	Borough	Metropolitan Police Service	2013	2014	£0	£1,539,000	1	£1,539,000	£166,666	£1,206,000	£1,372,666	£166,334	S106
ELRS 7	Community Safety	Enhanced Policing Year 3	Additional cost of 24/7 policing 'Safer Neighbourhood Team' in areas surrounding specific development sites. Current scheme operates in Shepherds Bush Green Ward but this would apply across the borough. 2014/15 financial year.	41	ES1	-	Borough	Metropolitan Police Service	2014	2015	£0	£1,325,000	1	£1,325,000	£166,666	£992,000	£1,158,666	£166,334	S106

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106	Total		Funding Gap
ELRS 8	Community Safety	Enhanced Policing Year 4	Additional cost of 24/7 policing 'Safer Neighbourhood Team' in areas surrounding specific development sites. Current scheme operates in Shepherds Bush Green Ward but this would apply across the borough. 2015/16 financial year.	41	ES1	-	Borough	Metropolitan Police Service	2015	2016	£0	£1,325,000	1	£1,325,000	£0	£100,000	£100,000	£1,225,000	S106
ELRS 9	Community Safety	Enhanced Policing Year 5	Additional cost of 24/7 policing 'Safer Neighbourhood Team' in areas surrounding specific development sites. Current scheme operates in Shepherds Bush Green Ward but this would apply across the borough. 2016/17 financial year.	41	ES1	-	Borough	Metropolitan Police Service	2016	2017	£0	£1,325,000	1	£1,325,000	£0	£100,000	£100,000	£1,225,000	S106
ELRS 10	Community Safety	CCTV Maintenance	CCTV maintenance	New	ES6	-	Borough		2015	2025	£0	£40,000	10	£400,000	£0	£0	£0	£400,000	R123 CIL
ELRS 11	Community Safety	Public Space CCTV Borough	Install CCTV and link private systems to integrated borough-wide council network to assist in prevention and detection of crime (cost includes camera, fixing, groundworks, transmission). Enhance CCTV hubs.	New	ES6	-	Borough		2013	2032	£325,000	£16,200	20	£649,000	£0	£0	£0	£649,000	R123 CIL
ELRS 12	Community Safety	Public Space CCTV White City	Install CCTV and link private systems to integrated borough-wide council network to assist in prevention and detection of crime (cost includes camera, fixing, groundworks, transmission). Enhance CCTV hubs.	New	ES7	WC36	White City		2013	2031	£0	£13,200	17	£224,400	£40,000	£0	£40,000	£184,400	S106
ELRS 13	Community Safety	Public Space CCTV South Fulham	Install CCTV and link private systems to integrated borough-wide council network to assist in prevention and detection of crime (cost includes camera, fixing, groundworks, transmission). Enhance CCTV hubs.	New	ES8	SF8	South Fulham		2012	2016	£50,000	£3,000	20	£110,000	£80,000	£0	£80,000	£30,000	R123 CIL
ELRS 14	Community Safety	Deployable CCTV	Need for rapid Deployable CCTV to deal with dynamic hotspots.	New	ES9	-	Borough		2014	2015	£120,000	£20,000	1	£140,000	£0	£140,000	£140,000	£0	R123 CIL
ELRS 15	Leisure	Linford Christie Outdoor Sports Centre Pavilion & Facilities	Improve and enhance sport and leisure offer - Replace dilapidated pavilion and changing facilities. Health and safety improvements to accommodate increase in population using facilities.	42	L4	WC29	White City		2015	2031	£2,040,000	£180,000	6	£3,120,000	£0	£0	£0	£3,120,000	R123 CIL
ELRS 16	Leisure	Phoenix Leisure Centre & Janet Adegoke Swimming Pool	Increase public usage of sport and leisure offer for indoor sports.	42	L3	-	Borough		2013	2014	£315,000	£0	0	£315,000	£0	£0	£0	£315,000	R123 CIL
ELRS 17	Leisure	Lillie Road Fitness Centre	Improve and enhance sport and leisure offer. Works now completed.	42	L2	-	Borough	Greenwich Leisure Limited	2012	2016	£500,000	£0	0	£500,000	£500,000	£0	£500,000	£0	R123 CIL
ELRS 18	Leisure	Gym White City	Full size (at least 100 stations) accessible public gym. Assume 1,600m2 GIA. The costs include fit out. Assumed to be commercial operation. On-going costs represent subsidy for improved access for low income residents. Could be provided by enhancing existing facilities in area.	42	L5	WC19	White City	Developers	2017	2031	£3,040,000	£55,000	6	£3,370,000	£0	£0	£0	£3,370,000	S106
ELRS 19	Leisure	Sports Hall White City	In-kind provision of 6-8 courts. Assume 2,100 GIA. The costs include fit out. Assumed to be commercial operation. On-going costs represent subsidy for improved access for low income residents. Alternatively could be provided by enhancing existing facilities in area.	42	L6	WC20	White City	Developers	2022	2031	£4,000,000	£55,000	6	£4,330,000	£0	£0	£0	£4,330,000	S106
ELRS 20	Leisure	Gym & Leisure Centre Earls Court	In-kind provision and leasing of gym and public leisure centre of approximately 5,000m2 as part of development.	42	L8	-	Fulham (inc. Earls Court)	Developers	2013	2031	£7,609,247	£0	0	£7,609,247	£0	£7,609,247	£7,609,247	£0	S106

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ELRS 21	Leisure	Subsidised Sports Facilities Membership Earls Court Seagrave Road	£136k agreed as part of Seagrave Road S106 for subsidising membership of local sports facilities for occupiers of the affordable housing.	42	L7	-	Fulham (inc. Earls Court)	Developers	2013	2031	£136,000	£0	0	£136,000	£0	£136,000	£136,000	£0	S106
ELRS 22	Leisure	Hammersmith Park	All-weather football facility comprising 2 seven-a-side pitches 11 five-a-side pitches and a two-on-two basketball training court to replace an existing all weather pitch, tennis and basketball courts, bowling green and disused playground. New pavilion containing community multi-use room, changing rooms and office. Planning application reference 2013/01084/FUL without prejudice.	New	New	-	White City	Play Football Ltd	2013	2016	£2,100,000	£0	0	£2,100,000	£2,100,000	£0	£2,100,000	£0	Site
ELRS 23	Leisure	Ravenscourt Park Changing Rooms/Toilets	To meet the demands of the local schools and stakeholders.	42	L1	-	Hammersmith		2014	2018	£200,000	£0	0	£200,000	£0	£0	£0	£200,000	R123 CIL
ELRS 24	Parks	Ravenscourt Park Sports Provision	Improvements to the sport provisions in Ravenscourt Park, such as the All Weather Pitch (AWP) and tennis courts.	42	L1	-	Hammersmith		2014	2018	£500,000	£0	0	£500,000	£0	£0	£0	£500,000	R123 CIL
ELRS 25	Parks	Ravenscourt Park Facilities	Improvements to the south end facilities at Ravenscourt Park such as the play area, paddling pool, arches and entrances.	51	L1	-	Hammersmith		2015	2018	£500,000	£0	0	£500,000	£0	£0	£0	£500,000	R123 CIL
ELRS 26	Parks	Wormwood Scrubs	Assets and drainage improvements.	50	New	-	Park Royal		2013	2015	£250,000	£0	0	£250,000	£0	£0	£0	£250,000	Future CIL
ELRS 27	Parks	Wormholt Park	Refurbish park as per masterplan.	50	L18	-	Borough		2013	2016	£1,500,000	£0	0	£1,500,000	£1,000,000	£0	£1,000,000	£500,000	R123 CIL
ELRS 28	Parks	Open Space White City	Provide and maintain new open space. Allowance includes for 15,000m2 of landscaping adjacent to Hammersmith and City Line. This costs include for larger proportion of hard landscaping with some soft & green landscaping.	51	L19	WC15	White City	Developers	2022	2026	£3,540,000	£15,000	10	£3,690,000	£1,150,000	£0	£1,150,000	£2,540,000	S106
ELRS 29	Parks	Shepherds Bush Green	Redevelopment to improve quality including 2 new playgrounds: 1 for under 5s and 1 for over 5s.	46	L17	-	White City		2009	2013	£4,600,000	£0	0	£4,600,000	£4,600,000	£0	£4,600,000	£0	S106
ELRS 30	Parks	Brook Green	Improvements required for Brook Green as per the Brook Green Vision document.	50	L15	-	Borough		2013	2016	£1,000,000	£0	0	£1,000,000	£260,000	£490,000	£750,000	£250,000	S106
ELRS 31	Parks	Open Space Earls Court	Provide and maintain open space as part of development.	51	L22	-	Fulham (inc. Earls Court)	Developers	2013	2031	£12,375,503	£0		£12,375,503	£12,375,503	£0	£12,375,503	£0	S106
ELRS 32	Parks	Open Space Earls Court Seagrave Road	£3,250,000 agreed as part of Seagrave Road S106 for either for acquiring the Lost River Park or for improving and enhancing open space in the vicinity of the development.	51	L23	-	Fulham (inc. Earls Court)	Developers	2013	2031	£3,250,000	£0		£3,250,000	£3,250,000	£0	£3,250,000	£0	S106
ELRS 33	Parks	Brompton Cemetery	Contribution to Royal Parks towards improvement and enhancement works.	51	L24	-	Fulham (inc. Earls Court)	Royal Parks	2013	2031	£350,000	£0	0	£350,000	£0	£350,000	£350,000	£0	S106
ELRS 34	Parks	Eel Brook Common	Funds to consult, develop and improve the north end of Eel Brook Common & address the boundary treatment, paving and site furniture.	50	L14	-	Borough		2013	2016	£800,000	£0	0	£800,000	£200,000	£598,000	£798,000	£2,000	S106
ELRS 35	Parks	Bishop's Park Major Improvements	Restoration of park infrastructure, security, riverside railings, underground services and features.	49	L16	-	Borough	National Lottery	2011	2015	£8,000,000	£100,000	4	£8,400,000	£7,000,000	£325,000	£7,325,000	£1,075,000	S106
ELRS 36	Parks	Bishop's Park Other Improvements	Additional areas for improvements at Bishop's Park including perimeter railings replacement, tree works, additional planting, riverwalk lighting and paving and re-landscaping of Putney Bridge area.	49	L16	-	Borough		2014	2018	£350,000	£0	0	£350,000	£0	£0	£0	£350,000	R123 CIL

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ELRS 37	Parks	Bishop's Park Fulham Football Club Improvements	Improve access to Fulham Football Club, improvements to the Riverwalk including lighting and resurfacing. Complete refurbishment of toilets. Relandscape subway entrance at Putney Bridge. Subject to implementation of Fulham Football Club development.	49	L16	-	Borough		2014	2014	£600,000	£0	0	£600,000	£0	£600,000	£600,000	£0	S106
ELRS 38	Parks	Bishop's Park Fulham Football Club Improvements - Heritage Gates	Replacement of Heritage Parks Gates at Stevenage Road entrance. Subject to implementation of Fulham Football Club development.	49	L16	-	Borough		2014	2014	£40,000	£0	0	£40,000	£0	£40,000	£40,000	£0	S106
ELRS 39	Parks	Bishop's Park Fulham Football Club Improvements	General maintenance at Bishops Park for reinstatement of grounds post football matches. Subject to implementation of Fulham Football Club development.	49	L16	-	Borough		2014	2033	£0	£20,000	20	£400,000	£0	£400,000	£400,000	£0	S106
ELRS 40	Parks	Bishop's Park / Fulham Palace Archaeological Work	Archaeology work required at Fulham Palace / Bishops Park as part of the HLF funding agreement	49	L16	-	Borough		2013	2014	£0	£80,000	1	£80,000	£0	£0	£0	£80,000	R123 CIL
ELRS 41	Parks	Fulham Palace	Fulham Palace improvement works as per Masterplan including works to Entrance Approach, new build opposite stable block & learning gardens, main entrance, chaplains gardens, main lawn, walled garden and moat.	50	New	-	Borough		2014	2016	£750,000	£0	0	£750,000	£0	£0	£0	£750,000	R123 CIL
ELRS 42	Parks	Hurlingham Park Pavilion	Hurlingham Park pavilion upgrades and extension. To accommodate the minimum number of participants (8 teams) at once	51	New	-	South Fulham		2014	2015	£250,000	£0	0	£250,000	£0	£250,000	£250,000	£0	S106
ELRS 43	Parks	Hurlingham Park All Weather Pitch	Hurlingham Park All Weather Pitch (AWP) redevelopment	51	New	-	South Fulham	Fulham Football Club	2014	2016	£700,000	£0	0	£700,000	£350,000	£350,000	£700,000	£0	S106
ELRS 44	Parks	South Park Masterplan	Improve as per delivery plan / masterplan including paving, planting, MUGA, improved play spaces, and netball / basketball courts.	51	L21	SF5	South Fulham		2013	2021	£529,000	£145,000	1	£674,000	£600,000	£74,000	£674,000	£0	S106
ELRS 45	Parks	South Park Facilities	Upgrade to changing facilities and sports assets.	51	L21	-	South Fulham		2014	2016	£100,000	£0	0	£100,000	£0	£0	£0	£100,000	R123 CIL
ELRS 46	Parks	Imperial Road Gasworks Site Open Space	Provision of on-site open space as part of possible future development of site.	New	New	SF	South Fulham		2017	2031	£0	£0	0	£0	£0	£0	£0	£0	Site
ELRS 47	Parks	Facilities	Costs to be identified Maintain, refurbish and upgrade multiple sports facilities across the borough's parks and increase accessibility,	50	L9	-	Borough		2013	2031	£5,600,000	£264,500	19	£10,625,500	£2,625,500	£0	£2,625,500	£8,000,000	R123 CIL
ELRS 48	Parks	Eel Brook Common Tennis Courts	Refurbish existing two tennis courts at Eel Brook Common.	50	New	-	Borough		2014	2016	£75,000	£0	0	£75,000	£0	£0	£0	£75,000	R123 CIL
ELRS 49	Parks	Lillie Road Rec MUGA	Refurbish existing MUGA at Lillie Road Rec	50	New	-	Borough		2014	2016	£100,000	£0	0	£100,000	£0	£0	£0	£100,000	R123 CIL
ELRS 50	Parks	Ancillary Buildings	To create and improve facilities such as depots, cafes, changing rooms, etc. to ensure they meet minimum safety, welfare, security, accessible and energy standards (Hammersmith, Normand, Ravenscourt, etc.)	50	L13	-	Borough		2013	2031	£7,350,000	£150,000	19	£10,200,000	£2,200,000	£0	£2,200,000	£8,000,000	R123 CIL
ELRS 51	Parks	South Park Central Buildings	To further improve the changing rooms and improve the surrounding buildings to provide space for a café and improve the toilets.	50	L13	-	South Fulham		2014	2016	£150,000	£0	0	£150,000	£0	£0	£0	£150,000	R123 CIL
ELRS 52	Parks	Assets High Priority	Replace all Category 4 and 5 assets from the most current asset register (22.03.11). Full details list of all high priority safety concerns, such as site furniture, lighting columns, etc. Health and safety improvements to accommodate increase in population using assets.	50	L10	-	Borough		2013	2015	£750,000	£0	0	£750,000	£0	£0	£0	£750,000	R123 CIL

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106	Total		
ELRS 53	Parks	Assets Lower Priority	Prioritise schemes to bring hard landscaping / park assets (fencing and railings, paving, structures, furniture, service hatches, bollards, bins, gates, etc.) up to a score of 3 out of 5 as set out in the Parks Asset Management Plan.	50	L10	-	Borough		2015	2031	£10,000,000	£100,000	16	£11,600,000	£0	£0	£0	£11,600,000	R123 CIL
ELRS 54	Parks	Soft Landscaping and Biodiversity	Re-model and refurbish to improve quality and attractiveness, including planting schemes, horticultural features, green roofing, flood management and biodiversity.	50	L12	-	Borough		2020	2030	£7,500,000	£50,000	10	£8,000,000	£1,500,000	£0	£1,500,000	£6,500,000	R123 CIL
ELRS 55	Parks	Play Spaces	Maintain, refurbish and upgrade 38 play spaces (those not listed elsewhere in schedule) across the borough's parks.	55	L11	-	Borough	DfE	2013	2031	£9,500,000	£75,000	19	£10,925,000	£3,875,000	£0	£3,875,000	£7,050,000	R123 CIL
ELRS 56	Waste & Street Enforcement	Recycling Bin Sites	Recycling bin sites - introduction of housings for bins, improving their appearance	New	New	-	Borough		2013	2021	£50,000	£0	0	£50,000	£0	£0	£0	£50,000	R123 CIL
ELRS 57	Waste & Street Enforcement	Litter Bins Borough	Replace/add to existing litter bins around the borough to deal with increasing population. Replace litter bins in all open spaces with a dual litter/recycling bins.	New	New	-	Borough		2013	2023	£80,000	£0	0	£80,000	£0	£80,000	£80,000	£0	-
ELRS 58	Waste & Street Enforcement	Litter Bins Fulham Town Centre	Provide 30 litter bins to deal with increased footfall and need to minimise dropped litter and subsequent cleansing pressure.	New	U6	-	Borough		2013	2023	£24,000	£0	10	£24,000	£0	£24,000	£24,000	£0	-
ELRS 59	Waste & Street Enforcement	Litter Bins White City / Shepherds Bush	Provide 30 litter bins. Included in Environmental Improvements category for White City.	New	U7	WC env imps	White City		2013	2016	£0	£0		£0	£0	£0	£0	£0	-
ELRS 60	Waste & Street Enforcement	Litter Bins South Fulham Riverside	Provide 30 litter bins to deal with increased footfall and need to minimise dropped litter and subsequent cleansing pressure.	New	U8	SF9	South Fulham		2013	2026	£24,000	£0	0	£24,000	£0	£24,000	£24,000	£0	-
ELRS 61	Waste & Street Enforcement	Litter Bins Hammersmith Town Centre	Provide 30 litter bins to deal with increased footfall and need to minimise dropped litter and subsequent cleansing pressure.	New	U9	-	Hammersmith		2013	2023	£24,000	£0	0	£24,000	£0	£24,000	£24,000	£0	-
Finance & Corporate Governance																			
FCG 1	Community Investment	Third Sector Hub 20 Dawes Road	Consolidate third sector facilities. Not including residential element.	47	C1	-	Borough	Fulham Community Partnership Trust Shepherds Bush Housing Group	2010	2012	£2,400,000	£0		£2,400,000	£2,400,000	£0	£2,400,000	£0	-
FCG 2	Community Investment	Third Sector Hub Edward Woods Estate	Establish third sector facilities within Boxmoor, Norland, Poynter and Stebbing Houses, including flexible office space (approx. 8 units, 688m2 total). Not including residential development and cladding of towers.	47	C2	-	Borough		2010	2013	£720,000	£0		£720,000	£720,000	£0	£720,000	£0	-
FCG 3	Community Investment	Third Sector Hub Lyric Theatre	Consolidate third sector facilities (£0.5m) to include designated community hub - total aggregate area within the Lyric development not to exceed 60 square metres and additional access to activity space. To accommodate 3rd sector organisations. Separate to expanded theatre / cultural facilities.	47	C3	-	Hammersmith	LBHF (£2.8m commit.) Arts Council DCMS LDA NDC Lyric	2012	2014	£13,500,000	£0		£13,500,000	£13,500,000	£0	£13,500,000	£0	-
FCG 4	Community Investment	Third Sector Hub Park Royal	Establish third sector facilities. Costs to be identified.	47	New	-	Park Royal		2017	2031	£0	£0		£0	£0	£0	£0	£0	Future CIL

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106			Total
FCG 5	Community Investment	Disability Services Accommodation / Edward Woods Community Centre	Potential relocation of disability services accommodation (currently provided at Greswell Centre, occupied by Action on Disability - see Cabinet Report 22nd July 2013) to the Edward Woods Community Centre alongside other community meeting room use. Costs estimated at £333,500 - £457,930.	43	C4	-	White City		2014	2015	£457,930	£0	11	£457,930	£0	£137,000	£137,000	£320,930	S106
FCG 6	Community Investment	Community Space White City	1,000sqm of community space to support local groups and Further Education outreach programmes.	43	C5	WC35	White City	Developers	2021	2031	£250,000	£49,274	11	£792,014	£0	£0	£0	£792,014	Site
FCG 7	Community Investment	Community Space (Hurlingham & Chelsea School Site) South Fulham	Provide community facility including library and adult learning and skills (re-provision of Sands End Library / Community Centre). Now all complete.	43	C6	-	South Fulham	Developers	2012	2012	£1,650,000	£0		£1,650,000	£1,650,000	£0	£1,650,000	£0	-
FCG 8	Community Investment	Community Space Earls Court	Provide community meeting space, co-located with other proposed community facilities, within the borough boundary, in addition to facilities proposed in neighbouring Royal Borough of Kensington and Chelsea.	43	C7	-	Fulham (inc. Earls Court)	Developers	2014	2031	£4,861,500	£0		£4,861,500	£4,861,500	£0	£4,861,500	£0	S106
FCG 9	Community Investment	Cultural Space Earls Court	Provision of cultural space	43	C8	-	Fulham (inc. Earls Court)	Developers	2014	2031	£4,861,500	£0		£4,861,500	£4,861,500	£0	£4,861,500	£0	S106
Page 123 Housing & Regeneration																			
HR 1	Economic Development, Adult Learning & Skills	End Use Recruitment and Job Shop White City Capital Investment	Construction of on-site premises to assist local people to compete for end use jobs. Potential for adult learning and skills element. Assumes all construction costs including fit-out and a lease in perpetuity. Supported by Workplace Coordinators.	New	EL1	WC22	White City	Skills Funding Agency	2014	2016	£1,500,000	£0		£1,500,000	£500,000	£0	£500,000	£1,000,000	S106
HR 2	Economic Development, Adult Learning & Skills	End Use Recruitment and Job Shop White City Revenue Investment	Construction of on-site premises to assist local people to compete for end use jobs. Potential for adult learning and skills element. Assumes all construction costs including fit-out and a lease in perpetuity. Supported by Workplace Coordinators.	New	EL2	-	White City	Skills Funding Agency	2017	2031	£0	£150,000	19	£2,850,000	£900,000	£0	£900,000	£1,950,000	S106
HR 3	Economic Development, Adult Learning & Skills	End Use Recruitment and Job Shop Earls Court	Construction of on-site premises to assist local people to compete for end use jobs. Potential for adult learning and skills element. Assumes all construction costs including fit-out and a lease in perpetuity. Supported by Workplace Coordinators.	New	EL3	-	Fulham (inc. Earls Court)	Skills Funding Agency	2014	2031	£1,500,000	£150,000	15	£3,750,000	£1,500,000	£0	£1,500,000	£2,250,000	S106
HR 4	Economic Development, Adult Learning & Skills	Construction Skills Training Centre	Construction of on-site (potentially mobile) centre to assist local people to compete for construction jobs. Supported by Workplace Coordinators.	New	EL4	-	Fulham (inc. Earls Court)	Skills Funding Agency	2014	2031	£2,500,000	£410,000	15	£8,650,000	£2,500,000	£0	£2,500,000	£6,150,000	S106
HR 5	Economic Development, Adult Learning & Skills	Employment, Training and Workplace Coordinators White City	Provision of Workplace Coordinators (employed by the council but hosted by the developer) to assist local people to compete for end use and construction jobs and to fund training and apprenticeships.	New	EL5	WC22	White City	Skills Funding Agency	2014	2031	£0	£115,000	20	£2,300,000	£2,300,000	£0	£2,300,000	£0	S106
HR 6	Economic Development, Adult Learning & Skills	Employment, Training and Workplace Coordinators South Fulham	Provision of Workplace Coordinators (employed by the council but hosted by the developer) to assist local people to compete for end use and construction jobs and to fund training and apprenticeships.	New	EL6	SF6	South Fulham	Skills Funding Agency	2014	2031	£0	£56,876	20	£1,137,528	£580,000	£0	£580,000	£557,528	S106
HR 7	Economic Development, Adult Learning & Skills	Employment, Training and Workplace Coordinators Earls Court	Provision of Workplace Coordinators (employed by the council but hosted by the developer) to assist local people to compete for end use and construction jobs and to fund training and apprenticeships.	New	EL7	-	Fulham (inc. Earls Court)	Skills Funding Agency	2014	2031	£0	£249,333	15	£3,740,000	£0	£350,000	£350,000	£3,390,000	S106

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106	Total		Funding Gap
HR 8	Economic Development, Adult Learning & Skills	Business Hub / Incubator White City	Provision of touchdown / desk space for businesses to use via a membership fee (rather than letting / leasing fixed spaces). *WCOA Cost assumes 20,000 sq.ft office which includes all construction costs and lifetime lease.	New	EL8	WC33	White City		2015	2016	£700,000	£0		£700,000	£0	£0	£0	£700,000	S106
HR 9	Economic Development, Adult Learning & Skills	Business Hub / Incubator Borough	Provision of touchdown / desk space for businesses to use via a membership fee (rather than letting / leasing fixed spaces).	New	EL9	-	Borough		2015	2021	£14,000	£0		£14,000	£0	£0	£0	£14,000	R123 CIL
HR 10	Economic Development, Adult Learning & Skills	Business Engagement White City	Business engagement and consultation with those businesses most affected. Commercial centres and visitor destination management. Support for new enterprises and established businesses. Inward investment activities to attract new occupiers.	New	EL10	WC34	White City		2014	2031	£0	£170,000	20	£3,400,000	£0	£0	£0	£3,400,000	S106
HR 11	Economic Development, Adult Learning & Skills	Business Engagement Earls Court	Allocation of land, with a North End Road address, for potential relocation of North End Road Street Market, subject to discussions between LBHF and street traders in order to ensure a workable solution. Support for businesses affected by Earls Court exhibition centre closures. Provision of affordable shop units and nomination rights. Costs to be identified.	New	EL11	-	Fulham (inc. Earls Court)		2014	2031	£0	£0		£0	£0	£0	£0	£0	S106
HR 12	Economic Development, Adult Learning & Skills	Business Engagement Hammersmith Town Centre	Provide town centre and visitor services to contribute to local economic growth.	New	EL12	-	Hammersmith		2014	2031	£0	£390,000	15	£5,850,000	£0	£0	£0	£5,850,000	S106
HR 13	Economic Development, Adult Learning & Skills	Business Engagement Fulham Town Centre	Provide town centre and visitor services to contribute to local economic growth.	New	EL13	-	Borough		2014	2031	£0	£390,000	15	£5,850,000	£0	£0	£0	£5,850,000	S106
HR 14	Economic Development, Adult Learning & Skills	Local Business Procurement Borough	Seek procurement opportunities for local SMEs associated with construction and end use of development. Costs to be identified.	New	EL14	-	Borough		2014	2031	£0	£0		£0	£0	£0	£0	£0	S106
HR 15	Economic Development, Adult Learning & Skills	Local Business Procurement White City	Seek procurement opportunities for local SMEs associated with construction and end use of development. Costs to be identified.	New	EL15	-	White City		2014	2031	£0	£0	0	£0	£0	£0	£0	£0	S106
HR 16	Economic Development, Adult Learning & Skills	Local Business Procurement South Fulham	Seek procurement opportunities for local SMEs associated with construction and end use of development. Costs to be identified.	New	EL16	-	South Fulham		2014	2031	£0	£0		£0	£0	£0	£0	£0	S106
HR 17	Economic Development, Adult Learning & Skills	Local Business Procurement Earls Court Main Site	Seek procurement opportunities for local SMEs associated with construction and end use of development. Costs to be identified.	New	EL17	-	Fulham (inc. Earls Court)		2014	2031	£0	£0		£0	£0	£0	£0	£0	S106
HR 18	Economic Development, Adult Learning & Skills	Local Business Procurement Earls Court Seagrave Road	Seek procurement opportunities for local SMEs associated with construction and end use of development.	New	EL18	-	Fulham (inc. Earls Court)		2014	2031	£26,010	£0		£26,010	£0	£26,010	£26,010	£0	S106

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106			Total
HR 19	Economic Development, Adult Learning & Skills	Local Business Procurement Hammersmith	Seek procurement opportunities for local SMEs associated with construction and end use of development. Costs to be identified.	New	EL19	-	Hammersmith		2014	2031	£0	£0	£0	£0	£0	£0	£0	S106	
HR 20	Economic Development, Adult Learning & Skills	Local Business Procurement Park Royal	Seek procurement opportunities for local SMEs associated with construction and end use of development. Costs to be identified.	New	EL20	-	Park Royal		2014	2031	£0	£0	£0	£0	£0	£0	£0	S106	
HR 21	Economic Development, Adult Learning & Skills	Phoenix Canberra Schools Site	Includes potential for adult education element as part of any co-location of services.	New	EL21	-	Borough	Phoenix Canberra Schools Federation	2014	2016	£150,000	£0	£150,000	£0	£0	£0	£150,000	R123 CIL	
HR 22	Economic Development, Adult Learning & Skills	See End Use Recruitment and Job Shop White City	Includes potential for adult learning and skills co-location. Costs to be identified.	New	EL22	-	White City					£0	£0	£0	£0	£0	£0	-	
HR 23	Economic Development, Adult Learning & Skills	See Community Space (Hurlingham and Chelsea School Site) South Fulham Riverside	Includes adult learning and skills co-location. Costs to be identified.	New	EL23	-	South Fulham					£0	£0	£0	£0	£0	£0	-	
HR 24	Economic Development, Adult Learning & Skills	See End Use Recruitment and Job Shop Earls Court	Includes potential for adult learning and skills co-location. Costs to be identified.	New	EL24	-	Fulham (inc. Earls Court)					£0	£0	£0	£0	£0	£0	-	
HR 25	Economic Development, Adult Learning & Skills	See Third Sector Hub Hammersmith	Includes adult learning and skills co-location. Costs to be identified.	New	EL25	-	Hammersmith					£0	£0	£0	£0	£0	£0	-	
HR 26	Economic Development, Adult Learning & Skills	King Street Regeneration Infrastructure	King Street Regeneration infrastructure related to possible redevelopment of Town Hall Extension and surrounding site. Potentially including: shop front improvement; environmental improvements (e.g. paving, planting, lighting, signage); 'shop local' campaign; town centre events; improvements to underpass at the end of Nigel Playfair Avenue (e.g. CCTV, lighting and decorations).	New	New	-	Hammersmith	Business Improvement District	2014	2016	£1,000,000	£0	0	£1,000,000	£0	£1,000,000	£1,000,000	£0	S106
Libraries & Archives																			
LA 1	Libraries & Archives	Hammersmith Library	More than a library' improvements, including self-service terminals, IT improvements, wi-fi, accessibility and refurbishment. Will also include the relocation of the Archive and Local Studies Service from The Lilla Huset, 191 Talgarth Road where the lease runs out in 2016. Works being carried out October 2013 - Summer 2014.	44	C13	-	Hammersmith		2013	2014	£2,690,000	£0		£2,690,000	£340,000	£2,350,000	£2,690,000	£0	-
LA 2	Libraries & Archives	Avonmore Library and Community Centre (formerly Barons Court Library)	Re-model for community library with Citizen's Advice Bureau and The Urban Partnership Group providing parent and child sessions through Masbro Children's Centre (re-provision of Barons Court Library). Now complete.	New	C9	-	Borough		2012	2012	£400,000	£0		£400,000	£400,000	£0	£400,000	£0	-

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LA 3	Libraries & Archives	Library Provision Earls Court	Fit-out and refresh of stock, new services (Business Information Points, adult learning activities) and potentially increased staffing costs for new 1,000m2 library provided as part of the Earls Court S106 agreement (no financial contribution).	New	New	-	Fulham (inc. Earls Court)	RBKC	2018	2021	£500,000	£120,000	4	£980,000	£0	£0	£0	£980,000	R123 CIL
LA 4	Libraries & Archives	Fulham Library	More than a library' improvements, including self-service terminals, IT improvements, wi-fi, accessibility and refurbishment. Phase 1 has been committed and implemented (£100k), and so has Phase 2 (£500k).	45	C10	-	Borough		2012	2016	£600,000	£0		£600,000	£600,000	£0	£600,000	£0	-
LA 5	Libraries & Archives	Fulham Library	Refurbishment and upgrading of basement area to be used as an overflow for Archives and Local History Centre from The Lilla Huset, 191 Talgarth Road and to provide expansion space for future requirements.	45	C10	-	Borough		2016	2016	£300,000	£0		£300,000	£0	£0	£0	£300,000	R123 CIL
LA 6	Libraries & Archives	Fulham Library	Refurbishment and upgrading of the first floor public areas, provide a modern meeting / events space for public hire and provide display capability for art / archives artefacts.	45	C10	-	Borough		2016	2016	£200,000	£0		£200,000	£0	£200,000	£200,000	£0	S106
LA 7	Libraries & Archives	See Community Space (Hurlingham & Chelsea School Site) South Fulham	Includes library co-location.	46	C12	-	South Fulham							£0	£0	£0	£0	£0	R123 CIL
Transport & Technical Services																			
TTS 1	Building & Property	Hammersmith Town Hall Improvements	Hammersmith Town Hall improvements.	New	New	-	Hammersmith		2014	2016	£8,500,000	£0	0	£8,500,000	£4,500,000	£4,000,000	£8,500,000	£0	R123 CIL
TTS 2	Energy	WCOA: 132/11kV primary substation	Required to support development as limited capacity in area. Total estimated cost is £15,000,000 with White City East to proportionally fund 40%.	New	U10	WC1	White City	UK Power Networks	2015	2016	£6,000,000	£0		£6,000,000	£700,000	£0	£700,000	£5,300,000	Site
TTS 3	Energy	Decentralised Energy Network White City	Construct heat pipe plant and networks to help meet carbon reduction targets. Subject to outcome of study by GLA/Arup.	11	U11	-	White City		2013	2031	£0	£0		£0	£0	£0	£0	£0	Site
TTS 4	Energy	Decentralised Energy Network South Fulham	Construct heat pipe plant and networks to help meet carbon reduction targets. Subject to outcome of study by GLA/Arup.	11	U12	SF11	South Fulham		2017	2026	£10,000,000	£0		£10,000,000	£0	£0	£0	£10,000,000	Site
TTS 5	Energy	Decentralised Energy Network South Fulham Scoping	Study to scope costs and delivery of CHP.	11	U13	SF11	South Fulham		2012	2016	£20,000	£0		£20,000	£20,000	£0	£20,000	£0	Site
TTS 6	Energy	Decentralised Energy Network Earls Court	Construct heat pipe plant and networks to help meet carbon reduction targets. Subject to outcome of study by GLA/Arup.	11	U14	-	Fulham (inc. Earls Court)		2013	2016	£0	£0		£0	£0	£0	£0	£0	Site
TTS 7	Energy	Decentralised Energy Network Hammersmith	Construct heat pipe plant and networks to help meet carbon reduction targets. Subject to outcome of study by GLA/Arup.	11	U15	-	Hammersmith		2017	2031	£29,000,000	£0		£29,000,000	£0	£0	£0	£29,000,000	Site
TTS 8	Energy	Decentralised Energy Network Park Royal	Construct heat pipe plant and networks to help meet carbon reduction targets. Subject to outcome of study by GLA/Arup.	11	U16	-	Park Royal		2013	2016	£0	£0		£0	£0	£0	£0	£0	Future CIL
TTS 9	Environmental Health	Air Quality Mitigation Earls Court Seagrave Road	Mitigation related to Seagrave Road	New	U17	-	Fulham (inc. Earls Court)		2013	2021	£46,235	£0		£46,235	£46,235	£0	£46,235	£0	S106

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TTS 10	Environmental Health	Air Quality Monitoring Stations	Air quality monitoring and replacement of equipment as appropriate (including existing station at Shepherds Bush and 10 diffusion tubes around the borough) to monitor trends in air quality, in particular in relation to impacts from general increase in borough development and population.	New	U18	-	Borough	TfL DEFRA	2013	2031	£0	£11,000	20	£220,000	£11,000	£0	£11,000	£209,000	R123 CIL	
TTS 11	Environmental Health	Contaminated Land	Treatment plants and monitoring wells.	New	New	-	Borough		2013	2031	£0	£50,000	20	£1,000,000	£0	£0	£0	£1,000,000	R123 CIL	
TTS 12	Environmental Health	Bore Hole South Fulham Riverside	For investigation of water abstraction.	New	U3	SF10	South Fulham		2013	2016	£60,000	£0		£60,000	£60,000	£0	£60,000	£0	S106	
TTS 13	Environmental Health	Noise Reduction Infrastructure	Provision of noise reduction infrastructure, in particular in relation to impacts from general increase in borough	New	U19	-	Borough	TfL DEFRA	2014	2016	£15,000	£0		£15,000	£0	£0	£0	£15,000	R123 CIL	
TTS 14	Drainage & Flooding	Thames Wall Borough	Upkeep and improve wall defences to ensure Thames Wall is an effective barrier to flood risk.	13	U4	-	Borough	Environment Agency Riparian landowners	2013	2031	£3,804,000	£0		£3,804,000	£0	£0	£0	£3,804,000	R123 CIL	
TTS 15	Drainage & Flooding	Thames Wall Hammersmith	Upkeep and improve wall defences to ensure Thames Wall is an effective barrier to flood risk. Costs to be identified.	13	U5	-	Hammersmith	"	2013	2031	£0	£0		£0	£0	£0	£0	£0	-	
TTS 16	Drainage & Flooding	Counters Creek Sewer	Replace, enlarge and supplement sewer system to update ageing infrastructure and increase capacity. Planning and development costs only provided.	12	U2	-	Borough	OFWAT Thames Water	2015	2020	£32,000,000	£0		£32,000,000	£32,000,000	£0	£32,000,000	£0	-	
TTS 17	Drainage & Flooding	Counters Creek Sewer SUDS / Green Streets	Three trial streets: Mendora Road, Melina Road and Arundel Gardens (RBKC). Jun 2012-Apr 2013: Feasibility Mar 2013-Jul 2013: Detailed design Jul-Nov 2013: Construction Nov 2013-Nov 2014: Performance monitoring	New	New	-	Borough	Thames Water	2013	2014	£0	£0		£0	£0	£0	£0	£0	£0	-
TTS 18	Drainage & Flooding	SUDS Stevenage Road & Queensmill Road	Sustainable Urban Drainage Systems (SUDS) to be developed.	New	U1	-	Borough	ELRS Parks	2013	2015	£200,000	£10,000	30	£500,000	£0	£0	£0	£500,000	R123 CIL	
TTS 19	Drainage & Flooding	SUDS Brook Green	Sustainable Urban Drainage Systems (SUDS) to be developed.	New	U1	-	Borough	ELRS Parks	2013	2014	£300,000	£5,000	30	£450,000	£0	£0	£0	£450,000	R123 CIL	
TTS 20	Drainage & Flooding	SUDS Lyric Square	Sustainable Urban Drainage Systems (SUDS) to be developed.	New	U1	-	Hammersmith		2013	2015	£200,000	£10,000	30	£500,000	£0	£0	£0	£500,000	R123 CIL	
TTS 21	Highways	SUDS Shepherds Bush Town Centre (West)	Redesign carriageway and footway areas to reduce collisions, improve streetscape and extend pedestrian realm, improve crossing points, target factors that result in high street crime levels in the area. Better connections to Goldhawk Road and Shepherd's Bush Market stations. To include SUDS.	New	T94	-	White City	TfL	2013	2015	£3,200,000	£0		£3,200,000	£2,500,000	£700,000	£3,200,000	£0	R123 CIL	
TTS 22	Highways	Highway Maintenance Reserve List	Repairing poor condition highways.	New	New	-	Borough		2014	2030	£0	£3,577,000	30	£107,310,000	£70,680,000	£0	£70,680,000	£36,630,000	R123 CIL	
TTS 23	Highways	Tree Planting Strategy	Plant new trees (approximately 100 per year) to improve attractiveness and biodiversity (this is in addition to replacing approximately 200 per year).	New	L25	-	Borough	Resident / business sponsorship	2012	2021	£140,000	£0		£140,000	£0	£28,000	£28,000	£112,000	R123 CIL	
TTS 24	Highways	Mayor's Street Tree Programme	Plant new trees to improve attractiveness and biodiversity.	56	L31	-	Borough	GLA	2009	2012	£74,000	£0		£74,000	£74,000	£0	£74,000	£0	-	

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											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106			Total
TTS 25	Highways	Environmental improvements & public art Borough	Small-scale improvements fund for: minor open spaces; public art on public realm; highway verges; town centre footway cleaning; S215 schemes; play facilities; greening; school playgrounds; signage; public realm maintenance; dealing with eyesores; local shopping centre public realm / shop front improvements.	New	L32	-	Borough		2013	2031	£500,000	£0	£500,000	£0	£0	£0	£500,000	R123 CIL	
TTS 26	Highways	Environmental improvements & public art White City	Small-scale improvements fund for: minor open spaces; public art on public realm; highway verges; town centre footway cleaning; S215 schemes; play facilities; greening; school playgrounds; signage; public realm maintenance; dealing with eyesores; local shopping centre public realm / shop front improvements.	New	L33	WC30	White City		2013	2031	£2,024,000	£7,181	19	£2,160,444	£40,000	£0	£40,000	£2,120,444	S106
TTS 27	Highways	Environmental improvements & public art South Fulham	Small-scale improvements fund for: minor open spaces; public art on public realm; highway verges; town centre footway cleaning; S215 schemes; play facilities; greening; school playgrounds; signage; public realm maintenance; dealing with eyesores; local shopping centre public realm / shop front improvements.	New	L34	-	South Fulham		2013	2031	£500,000	£0	£500,000	£0	£0	£0	£500,000	R123 CIL	
Page 128 TTS 28	Highways	Environmental improvements & public art Earls Court	Small-scale improvements fund for: minor open spaces; public art on public realm; highway verges; town centre footway cleaning; S215 schemes; play facilities; greening; school playgrounds; signage; public realm maintenance; dealing with eyesores; local shopping centre public realm / shop front improvements.	New	L35	-	Fulham (inc. Earls Court)		2013	2031	£9,168,333	£0	£9,168,333	£9,168,333	£0	£9,168,333	£0	S106	
TTS 29	Highways	Environmental improvements & public art Hammersmith	Small-scale improvements fund for: minor open spaces; public art on public realm; highway verges; town centre footway cleaning; S215 schemes; play facilities; greening; school playgrounds; signage; public realm maintenance; dealing with eyesores; local shopping centre public realm / shop front improvements.	New	L36	-	Hammersmith		2013	2031	£500,000	£0	£500,000	£0	£0	£0	£500,000	R123 CIL	
TTS 30	Highways	Environmental improvements & public art Park Royal	Small-scale improvements fund for: minor open spaces; public art on public realm; highway verges; town centre footway cleaning; S215 schemes; play facilities; greening; school playgrounds; signage; public realm maintenance; dealing with eyesores; local shopping centre public realm / shop front improvements.	New	L37	-	Park Royal		2022	2031	£500,000	£0	£500,000	£0	£0	£0	£500,000	Future CIL	
TTS 31	Highways	Environmental improvements & public art White City	To fund minor infrastructure schemes in neighbouring localities to ameliorate development impact. Costs to be identified.	New	L38	-	White City		2013	2031	£0	£0	20	£0	£0	£0	£0	£0	S106
TTS 32	Transport	Crossrail 2 Chelsea-Hackney Line	Improve track between Parsons Green and Wimbledon and construction of new line between Parsons Green and Chelsea to improve public transport accessibility in south of borough. Approx. £1.5bn whole scheme, approx. £2bn part of scheme through LBHF, approx. £1bn potential LBHF contribution - although likely Mayoral contribution and subject to review of options by TfL, TBC.	7	T5	-	London	DfT TfL	2019	2033	£2,000,000,000	£0	£2,000,000,000	£1,000,000,000	£0	£1,000,000,000	£1,000,000,000	Future CIL	

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TTS 33	Transport	High Speed Rail 2 Station	Construct HS2 station at Old Oak. Assumes £100m commitment from government subject to passage of Bill.	6	T7	-	Park Royal	DfT Network Rail HS2 Ltd	2026	2026	£100,000,000	£0	£100,000,000	£100,000,000	£0	£100,000,000	£0	Future CIL	
TTS 34	Transport	Crossrail Station	Construct station at Old Oak.	5	T8	-	Park Royal	Crossrail Ltd TfL LBHF	2017	2025	£25,000,000	£0	£25,000,000	£0	£0	£0	£25,000,000	Future CIL	
TTS 35	Transport	Interchange High Speed Rail 2 + Crossrail + West London Line Overground	Construct interchange at Old Oak to connect HS2, Crossrail and West London Line. Assumes approx. £10m commitment from agencies, with remainder sought from LBHF, TBC.	5, 6	T6	-	Park Royal	DfT Network Rail HS2 Ltd Crossrail Ltd TfL	2014	2025	£50,000,000	£0	£50,000,000	£10,000,000	£0	£10,000,000	£40,000,000	Future CIL	
TTS 36	Transport	Personal Rapid Transit	Personal Rapid Transit (PRT) light rail to link Kensal to Crossrail station only.		T9	-	Park Royal	TfL LBHF	2017	2025	£30,000,000	£0	£30,000,000	£0	£0	£0	£30,000,000	Future CIL	
TTS 37	Transport	West London Line Overground Station North Pole Road	Construct new station to increase accessibility and frequency of trains subject to robust business case. (The South East Route Utilisation Strategy (RUS) report - July 2011). Assumes equal commitment from other agencies TBC.	4	T1	-	Borough	TfL RBKC	2017	2025	£12,000,000	£0	£12,000,000	£8,000,000	£0	£8,000,000	£4,000,000	R123 CIL	
TTS 38	Transport	West London Line Overground Station Shepherds Bush	Increase platform length to facilitate 8 carriage trains serving the station (and potential reconfiguration or extension of the ticket hall). (The South East Route Utilisation Strategy (RUS) report - July 2011)	4	T2	WC3	White City	TfL	2015	2016	£3,900,000	£0	£3,900,000	£3,900,000	£0	£3,900,000	£0	S106	
TTS 39	Transport	West London Line Overground Station Imperial Wharf	Increase platform length. (The South East Route Utilisation Strategy (RUS) report - July 2011).	4	T3	SF1	South Fulham	TfL	2013	2016	£2,900,000	£0	£2,900,000	£2,900,000	£0	£2,900,000	£0	R123 CIL	
TTS 40	Transport	West London Line Overground Station West Brompton	Increase platform length for 8 car trains. (The South East Route Utilisation Strategy (RUS) report - July 2011). Agreed as part of Seagrave Road S106.	4	T4	-	Fulham (inc. Earls Court)	TfL	2015	2016	£1,850,000	£0	£1,850,000	£1,850,000	£0	£1,850,000	£0	S106	
TTS 41	Transport	Underground Line District	Install new trains, new signalling, renewed track and new centralised service control centre to increase capacity, comfort and reliability.	2	T10	-	Borough	TfL	2013	2018	£500,000,000	£0	£500,000,000	£500,000,000	£0	£500,000,000	£0	-	
TTS 42	Transport	Underground Line Piccadilly	Install new trains, new signalling system and new control centre to increase capacity, comfort and reliability.	3	T11	-	Borough	TfL	2026	2026	£500,000,000	£0	£500,000,000	£500,000,000	£0	£500,000,000	£0	-	
TTS 43	Transport	Underground Station Wood Lane	Potential new southern entrance.	10	T12	WC26	White City	TfL	2026	2026	£2,500,000	£0	£2,500,000	£0	£0	£0	£2,500,000	S106	
TTS 44	Transport	Underground Station White City	Potential White City eastern ticket hall with an associated extension to the walkway over the Central Line. Cost includes an allowance for step-free access associated with this new section of the station.	10	T13	WC25	White City	TfL	2026	2026	£13,000,000	£0	£13,000,000	£0	£0	£0	£13,000,000	S106	
TTS 45	Transport	Underground Station West Kensington	Provide new entrance, gateline capacity and step-free access at West Kensington Station through installation of lift.	10	T14	-	Fulham (inc. Earls Court)	TfL	2013	2031	£15,692,223	£0	£15,692,223	£15,692,223	£15,692,223	£15,692,223	£0	S106	
TTS 46	Transport	Underground Station West Brompton	Provide improved gateline capacity, increased concourse space, improve stairways and space. Agreed as part of Seagrave Road S106.	10	T15	-	Fulham (inc. Earls Court)	TfL	2013	2031	£1,100,000	£0	£1,100,000	£1,100,000	£0	£1,100,000	£0	S106	
TTS 47	Transport	Underground Station West Brompton	Improvements to capacity & lift	10	T16	-	Fulham (inc. Earls Court)	TfL	2013	2031	£2,617,831	£0	£2,617,831	£2,617,831	£0	£2,617,831	£0	S106	
TTS 48	Transport	Underground Station Earls Court West Kensington Station Staffing	Contribution to staffing costs	10	T17	-	Fulham (inc. Earls Court)	TfL	2022	2031	£0	£46,773	15	£701,596	£701,596	£0	£701,596	£0	S106
TTS 49	Transport	Station Step-Free Access East Acton	Installation of lift.	New	T18	-	Borough	TfL	2013	2031	£10,000,000	£0	£10,000,000	£0	£0	£0	£10,000,000	R123 CIL	

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TTS 50	Transport	Station Step-Free Access Shepherds Bush	Installation of lift.	New	T19	-	Borough	TfL	2013	2031	£100,000,000	£0	£100,000,000	£0	£0	£0	£100,000,000	R123 CIL
TTS 51	Transport	Station Step-Free Access Shepherds Bush Market	Installation of lift.	New	T20	-	Borough	TfL	2013	2031	£10,000,000	£0	£10,000,000	£0	£0	£0	£10,000,000	R123 CIL
TTS 52	Transport	Station Step-Free Access Goldhawk Road	Installation of lift.	New	T21	-	Borough	TfL	2013	2031	£10,000,000	£0	£10,000,000	£0	£0	£0	£10,000,000	R123 CIL
TTS 53	Transport	Station Step-Free Access Barons Court	Installation of lift.	New	T22	-	Borough	TfL	2013	2031	£10,000,000	£0	£10,000,000	£0	£0	£0	£10,000,000	R123 CIL
TTS 54	Transport	Station Step-Free Access White City	This would ensure that there is step-free access provision serving all of the Underground lines in the White City East area, and is likely to be a more cost effective solution than providing step-free access at Shepherd's Bush (which is a deep station).	10	T23	WC24	White City	TfL	2024	2026	£17,500,000	£0	£17,500,000	£0	£0	£0	£17,500,000	R123 CIL
TTS 55	Transport	Station Step-Free Access West Brompton	Installation of lift. £1.2m agreed as part of Seagrave Road S106 for access to Southbound - Wimbledon branch.	10	T24	-	Fulham (inc. Earls Court)	TfL	2013	2016	£1,200,000	£0	£1,200,000	£0	£1,200,000	£1,200,000	£0	S106
TTS 56	Transport	Station Step-Free Access Ravenscourt Park	Installation of lift.	10	T25	-	Hammersmith	TfL	2013	2031	£10,000,000	£0	£10,000,000	£0	£0	£0	£10,000,000	R123 CIL
TTS 57	Transport	Sands End Pier/Chelsea Harbour Pier	Upgrade pier increase capacity for water based traffic, improve transport accessibility and priming support for services.	8	T26	SF1	South Fulham	TfL	2022	2026	£830,000	£0	£830,000	£0	£170,000	£170,000	£660,000	S106
TTS 58	Transport	River Bus Service	Contribution to improved services (could include new/improved piers as above)	10	T27	-	South Fulham		2013	2026	£850,000	£0	£850,000	£0	£850,000	£850,000	£0	S106
TTS 59	Transport	Bus Improvements White City	Bus capacity improvements on three existing routes. The cost estimate allows for pump priming service changes for 5 years. There is an allowance of £50,000 for the implementation and maintenance of 'Countdown' facilities at 4 bus stops (M,N,L,P) on Wood Lane.	10	T28	WC5	White City	TfL	2021	2021	£5,350,000	£0	£5,350,000	£0	£1,450,000	£1,450,000	£3,900,000	S106
TTS 60	Transport	Bus Improvements South Fulham	Bus interventions package 3.	10	T29	SF1	South Fulham	TfL	2017	2021	£7,818,155	£0	£7,818,155	£4,265,000	£0	£4,265,000	£3,553,155	S106
TTS 61	Transport	Bus Improvements Earls Court	Bus infrastructure and bus capacity improvements.	10	T30	-	Fulham (inc. Earls Court)	TfL	2013	2021	£5,450,000	£0	£5,450,000	£0	£5,450,000	£5,450,000	£0	S106
TTS 62	Transport	Bus Improvements Earls Court Seagrave Road	Bus infrastructure and bus capacity improvements.	10	T31	-	Fulham (inc. Earls Court)	TfL	2012	2021	£144,000	£0	£144,000	£0	£144,000	£144,000	£0	S106
TTS 63	Transport	Coaches, Taxis & Drop Off Earls Court	Provision of taxi ranks, coachparking and drop off facilities. Costs to be identified.	10	T32	-	Fulham (inc. Earls Court)	TfL	2013	2031	£0	£0	£0	£0	£0	£0	£0	Site
TTS 64	Transport	Highways & Junctions Hammersmith Flyover Technical Feasibility Study	Construction of Hammersmith flyunder. Cut and cover (short option) £250m. Bored (long option) £1200m.	10	T33	-	Hammersmith	TfL	2020	2025	£250,000,000	£0	£250,000,000	£0	£0	£0	£250,000,000	Future CIL
TTS 65	Transport	Highways & Junctions Hammersmith Gyrotary	Removal of Hammersmith Gyrotary and return traffic to two way working on eastern arm (in conjunction with Hammersmith Flyover project)	10	T33	-	Hammersmith	TfL	2014	2020	£10,000,000	£0	£10,000,000	£10,000,000	£0	£10,000,000	£0	Future CIL
TTS 66	Transport	Highways & Junctions Fulham Palace Road / Hammersmith Gyrotary	Improve northbound access from Fulham Palace Road to the Hammersmith Gyrotary to improve bus priority measure for route 220. Opened Spring 2012.	1	T36	-	Borough	TfL	2013	2012	£2,500,000	£0	£2,500,000	£2,500,000	£0	£2,500,000	£0	-

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TTS 67	Transport	Highways & Junctions A40 Westway	Improve traffic flow at Savoy Circus junction subject to further feasibility analysis. 3 options: minor widening (£0.5m), flyover (E-W or N-S) (£50m), new road (£500m+). Assumption made on funding from TfL - TBC.	New	T34	-	Borough	TfL LB Ealing	2013	2031	£50,000,000	£0	£50,000,000	£37,500,000	£0	£37,500,000	£12,500,000	R123 CIL
TTS 68	Transport	Highways & Junctions North-South Road Improvements	North-South road improvements (in addition to those proposed in Regeneration Areas). Assumption made on funding from TfL - TBC.	New	T35	-	Borough	TfL	2013	2031	£50,000,000	£0	£50,000,000	£25,000,000	£0	£25,000,000	£25,000,000	R123 CIL
TTS 69	Transport	Highways & Junctions Adoption of White City Way and access routes	Funds to provide road infrastructure to connect development plots - This is for Primary and Secondary roads only as ECH Estimate May 07 with drainage and utilities distribution	10	T37	-	White City	TfL	2013	2031	£100,000	£0	£100,000	£100,000	£0	£100,000	£0	Site
TTS 70	Transport	Highways & Junctions Access (road bridge and open space deck) from Wood Lane / South Africa Road junction	Depot Road access improvements and new realigned east-west road bridge for all users over the Central Line cutting to provide direct connection from South Africa Road and widening bridge to accommodate open space.	10	T38	WC Site Spec.	White City		2013	2031	£6,300,000	£0	£6,300,000	£6,300,000	£0	£6,300,000	£0	Site
TTS 71	Transport	Highways & Junctions Access (road bridge & open space deck) from Wood Lane to M&S site and White City Green	New east-west land bridge (open space) to improve east-west connectivity over the Central Line cutting between White City and Wood Lane LUL Stations. This would be amenity space / no buildings on it.	10	T39	WC Site Spec.	White City		2013	2031	£2,800,000	£0	£2,800,000	£2,800,000	£0	£2,800,000	£0	Site
TTS 72	Transport	Highways & Junctions BBC site (west of Wood Lane) access improvements	Cost to cover the fourth arm of a new 4-arm signal access junction. (total cost £200,000, so £50,000 per arm).	10	T40	WC Site Spec.	White City	TfL	2013	2031	£50,000	£0	£50,000	£50,000	£0	£50,000	£0	Site
TTS 73	Transport	Highways & Junctions Off-site improvements White City	<ul style="list-style-type: none"> • Shepherd's Bush Gyratory – Uxbridge Road junction with Wood Lane (northwest corner of the green) – total cost £3.19m. • Shepherd's Bush Gyratory – Goldhawk Road junction with Shepherds Bush Green (south west corner of the green) – total cost £1.63m. • Boemfontein Road / Uxbridge Road Junction – capacity improvements on the Uxbridge Road westbound approach – total cost £1.4m. 	10	T41	WC6	White City	TfL	2015	2016	£6,220,000	£0	£6,220,000	£1,700,000	£0	£1,700,000	£4,520,000	R123 CIL
TTS 74	Transport	Highways & Junctions South Fulham	Highways Package 1 including improvements to Camwath Road/Townmead Road and Wandsworth Bridge Road junction	10	T42	SF1	South Fulham	TfL	2013	2016	£8,624,725	£0	£8,624,725	£8,624,725	£0	£8,624,725	£0	S106
TTS 75	Transport	Highways & Junction South Fulham	Highways Package 1 - Land acquisition and utilities diversion costs	10	T43	SF1	South Fulham	TfL	2013	2016	£4,739,500	£0	£4,739,500	£4,739,500	£0	£4,739,500	£0	S106
TTS 76	Transport	Highways & Junctions South Fulham	Highways Package 2	10	T44	SF1	South Fulham	TfL	2017	2021	£2,828,297	£0	£2,828,297	£660,000	£0	£660,000	£2,168,297	S106
TTS 77	Transport	Highways & Junctions South Fulham	Highways Package 2 - Land acquisition and utilities diversion costs.	10	T45	SF1	South Fulham	TfL	2017	2026	£0	£0	£0	£0	£0	£0	£0	S106
TTS 78	Transport	Highways & Junctions South Fulham	Highways Package 3	10	T46	SF1	South Fulham	TfL	2017	2021	£677,780	£0	£677,780	£677,780	£0	£677,780	£0	S106
TTS 79	Transport	Highways & Junctions South Fulham	Highways Package 3 - Land acquisition and utilities diversion costs.	10	T47	SF1	South Fulham	TfL	2012	2021	£0	£0	£0	£0	£0	£0	£0	S106
TTS 80	Transport	Highways & Junctions Earls Court Seagrave Road	£865k + £350k = £1.215m agreed as part of Seagrave Road S106 for Lillie Road and Seagrave Road highway works.	10	T48	-	Fulham (inc. Earls Court)	TfL	2013	2031	£1,215,000	£0	£1,215,000	£1,215,000	£0	£1,215,000	£0	S106

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TTS 81	Transport	Highways & Junctions Earls Court Main Site	North-south connectivity, new access onto A4, traffic signal changes, reconfigure North End Road/Lillie Road junction. Investigate improvements to Earls Court one-way system.	10	T49	-	Fulham (inc. Earls Court)	TfL	2013	2031	£1,595,000	£0	15	£1,595,000	£1,595,000	£0	£1,595,000	£0	S106	
TTS 82	Transport	Travel Plan White City	Travel plan coordinator, annual promotional budget, surveys, monitoring, initiatives, review & reporting.	10	T98	WC9	White City	WestTrans	2017	2031	£0	£40,000	15	£600,000	£200,000	£0	£200,000	£400,000	S106	
TTS 83	Transport	Travel Plan Earls Court	Various measures	10	T95	-	Fulham (inc. Earls Court)	TfL	2013	2016	£1,811,950	£0	15	£1,811,950	£1,811,950	£0	£1,811,950	£0	S106	
TTS 84	Transport	Traffic Management & CPZ Review Earls Court	Commission review and implement local traffic management measures including addressing rat running; CPZ; etc. TBC as part of S106 of main site.	10	T50	-	Fulham (inc. Earls Court)	TfL	2013	2031	£130,000	£0	15	£130,000	£0	£130,000	£130,000	£0	S106	
TTS 85	Transport	Transport Contingency Earls Court	Fund for various measures	10	T96	-	Fulham (inc. Earls Court)	TfL	2017	2031	£1,000,000	£0	15	£1,000,000	£1,000,000	£0	£1,000,000	£0	S106	
TTS 86	Transport	Strategic Transport Review Group Earls Court	Cost of running group	10	T97	-	Fulham (inc. Earls Court)	TfL	2017	2031	£0	£33,333	15	£500,000	£500,000	£0	£500,000	£0	S106	
TTS 87	Transport	Electric Car Charging Parking Spaces Borough	Electric charging points for residential, office and retail land uses in accordance with the 2011 London Plan standards.	New	T51	-	Borough	TfL	2013	2031	£0	£0	15	£0	£0	£0	£0	£0	£0	Site
TTS 88	Transport	Electric Car Charging Parking Spaces White City	Electric charging points for residential, office and retail land uses in accordance with the 2011 London Plan standards.	10	T52	-	White City	TfL	2013	2031	£2,060,000	£0	15	£2,060,000	£2,060,000	£0	£2,060,000	£0	Site	
TTS 89	Transport	Electric Car Charging Parking Spaces Earls Court	Electric charging points for residential, office and retail land uses in accordance with the 2011 London Plan standards.	10	T53	-	Fulham (inc. Earls Court)	TfL	2013	2031	£608,000	£0	15	£608,000	£608,000	£0	£608,000	£0	Site	
TTS 90	Transport	Car Club Earls Court	Arranging location and operation of car club facilities. Costs to be identified.	10	T54	-	Fulham (inc. Earls Court)	TfL	2013	2031	£0	£0	15	£0	£0	£0	£0	£0	£0	S106
TTS 91	Transport	Rail Freight Transfer Facility Earls Court	For construction materials and spoil removal for main site. Costs to be identified.	10	T58	-	Fulham (inc. Earls Court)	Network Rail TfL	2013	2031	£0	£0	15	£0	£0	£0	£0	£0	£0	Site
TTS 92	Transport	Consolidated Service & Delivery Facility White City	Logistics centre / warehouse on site 4,000sq.m GFA, based on an uplift from the Heathrow Retail Consolidation Centre, which is 2,320sq.m GFA.	10	T56	WC29	White City	TfL	2026	2026	£2,500,000	£0	15	£2,500,000	£0	£0	£0	£2,500,000	S106	
TTS 93	Transport	Consolidated Service & Delivery Facility Earls Court	For freight and domestic deliveries for main site. Costs to be identified.	10	T57	-	Fulham (inc. Earls Court)	TfL	2013	2031	£0	£0	15	£0	£0	£0	£0	£0	£0	Site
TTS 94	Transport	Local Connectivity Park Royal	Pedestrian bridge, road links, etc.	10	T55	-	Park Royal	TfL	2017	2026	£31,000,000	£0	15	£31,000,000	£0	£0	£0	£31,000,000	Future CIL	
TTS 95	Transport	Cycle Superhighway 9 (CS9)	Implement cycle superhighway between Hounslow and Central London through the borough to improve cycle access within and through the borough.	8	T59	-	Borough	TfL	2013	2016	£5,000,000	£0	15	£5,000,000	£5,000,000	£0	£5,000,000	£0	-	
TTS 96	Transport	Cycle Superhighway 10 (CS10)	Implement cycle superhighway between Park Royal and Central London along the Westway (A40) to improve cycle access within and through the borough.	New	T60	-	Borough	TfL	2016	2017	£5,000,000	£0	15	£5,000,000	£5,000,000	£0	£5,000,000	£0	-	
TTS 97	Transport	Mayor's Cycle Hire Scheme All Borough + Regen Areas	Provide 60-80 cycle hire docking stations (x25 bikes each) across the borough. Borough = £150k - £0 assumed = £150k	New	T61	-	White City	TfL	2013	2014	£2,000,000	£0	15	£2,000,000	£750,000	£1,250,000	£2,000,000	£0	S106	

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Ref #	Sub-Category	Scheme	Description	Core Strategy	CIL PDCS	WC / SFR/DIFS	Regen. Area	Other Agencies / Funding Sources	First Year £ Needed	Year Complete	Costs			Assumed / Committed Funding			Funding Gap	Proposed mechanism CIL S106 Site
											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106		
TTS 98	Transport	Mayor's Cycle Hire Scheme White City	Provide 60-80 cycle hire docking stations (x25 bikes each) across the borough. Figures all included in 'Borough' scheme and not duplicated here	10	T62	-	White City	TfL	2013	2014	£0	£0	£0	£0	£0	£0	£0	S106
TTS 99	Transport	Mayor's Cycle Hire Scheme Hammersmith	Provide 60-80 cycle hire docking stations (x25 bikes each) across the borough.	10	T65	-	Hammersmith	TfL	2013	2014	£0	£0	£0	£0	£0	£0	£0	S106
TTS 100	Transport	Mayor's Cycle Hire Scheme Earls Court	Provide 60-80 cycle hire docking stations (x25 bikes each) across the borough. Figures all included in 'Borough' scheme and not duplicated here	10	T64	-	Fulham (inc. Earls Court)	TfL	2013	2014	£0	£0	£0	£0	£0	£0	£0	S106
TTS 101	Transport	Mayor's Cycle Hire Scheme South Fulham	Provide 60-80 cycle hire docking stations (x25 bikes each) across the borough. Figures all included in 'Borough' scheme and not duplicated here	10	T63	SF1	South Fulham	TfL	2013	2014	£0	£0	£0	£0	£0	£0	£0	S106
TTS 102	Transport	Cycle & Pedestrian Routes Bridge South of the Hammersmith & City line viaduct	East-west pedestrian / cycle connections (structures) to the east of the site over A3220 and West London Line	10	T68	WC7	White City	TfL	2015	2016	£3,500,000	£0	£3,500,000	£1,500,000	£0	£1,500,000	£2,000,000	S106
TTS 103	Transport	Cycle & Pedestrian Routes Acquisition costs for bridge south of Hammersmith & City Line Viaduct	Part of an existing car park east of the proposed bridge will need to be acquired to allow for the bridge ramp to fall down to pavement level.	10	T69	WC8	White City		2015	2016	£1,200,000	£0	£1,200,000	£500,000	£0	£500,000	£700,000	S106
TTS 104	Transport	Cycle & Pedestrian Routes Subway from the Imperial College site to the Westway Leisure Centre	East-west pedestrian and cycle connection below West London Line north of Westway, including potential acquisition costs	10	T70	WC3	White City	TfL	2014	2016	£4,000,000	£0	£4,000,000	£4,000,000	£0	£4,000,000	£0	S106
TTS 105	Transport	Cycle & Pedestrian Routes Cycle link between BBC TVC & Shepherds Bush Market Station	Provide pedestrian / cycle link between BBC TVC and Shepherds Bush Market station. Costs to be identified.	10	New	-	White City	TfL	2014	2016	£0	£0	£0	£0	£0	£0	£0	S106
TTS 106	Transport	Cycle & Pedestrian Routes Earls Court	New pedestrian and cycle connections under A4 and south of Lillie Road. (If required following Transport Assessment). Improved east-west cycle connectivity into opportunity area. Cycle parking in OA and on surrounding streets.	10	T74	-	Fulham (inc. Earls Court)	TfL	2013	2031	£140,000	£0	£140,000	£140,000	£0	£140,000	£0	S106
TTS 107	Transport	Cycle & Pedestrian Routes Earls Court	Significant streetscape and footway capacity improvements: especially North End Road, Warwick Road, Old Bromton Road/Lillie Road, West Cromwell Road, Earls Court Road. Improved pedestrian crossings. Costs to be identified.	10	T75	-	Fulham (inc. Earls Court)	TfL	2013	2031	£0	£0	£0	£0	£0	£0	£0	S106
TTS 108	Transport	Pedestrian and Cycle Routes Earls Court Seagrave Road	Off site cycle routes and cycle parking improvements contribution. £75.5k agreed as part of Seagrave Road S106 for off site cycle routes and cycle parking improvements contribution.	10	T76	-	Fulham (inc. Earls Court)		2013	2031	£75,500	£0	£75,500	£75,500	£0	£75,500	£0	S106
TTS 109	Transport	Cycle & Pedestrian Routes Tunnel under Warwick Road	Reopen tunnel. Costs to be identified.	10	T77	-	Fulham (inc. Earls Court)	TfL RBKC	2013	2031	£0	£0	£0	£0	£0	£0	£0	S106
TTS 110	Transport	Cycle & Pedestrian Routes Earls Court Visitor Cycle Parking	In-kind provision of visitor cycle parking as part of design and development	10	T78	-	Fulham (inc. Earls Court)		2013	2031	£95,000	£0	£95,000	£95,000	£0	£95,000	£0	S106

20 LB Hammersmith Fulham Infrastructure Schedule (Draft) – August 2014

Ref #	Sub-Category	Scheme	Description	Core Strategy	CIL PDCS	WC / SFR DIFS	Regen. Area	Other Agencies / Funding Sources	First Year £ Needed	Year Complete	Costs			Assumed / Committed Funding			Funding Gap	Proposed mechanism CIL S106 Site
											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106		
TTS 111	Transport	Cycle & Pedestrian Routes Imperial Wharf Pedestrian & Cycle Bridge	Provide cycle bridge alongside existing Battersea Railway Bridge / Cremorne Bridge from Imperial Wharf to Battersea. Planning application 2012/03582/FUL for 'Diamond Jubilee Bridge' approved November 2013 by LBHF.	10	T71	SF1	South Fulham	Privately funded	2022	2026	£22,000,000	£0	£22,000,000	£22,000,000	£0	£22,000,000	£0	S106
TTS 112	Transport	Cycle & Pedestrian Routes South Fulham	To follow DIF/SPD. Costs to be identified.	10	T72	-	South Fulham	TfL	2017	2021	£0	£0	£0	£0	£0	£0	£0	-
TTS 113	Transport	Cycle & Pedestrian Routes South Fulham	Holistic neighbourhood improvements.	10	T73	SF1	South Fulham		2017	2021	£175,000	£0	£175,000	£175,000	£0	£175,000	£0	R123 CIL
TTS 114	Transport	Legible London White City	A wayfinding strategy, based on the principles of Legible London, should be implemented across the White City East site to encourage and enable more trips by foot.	10	T66	WC27	White City	TfL	2013	2031	£150,000	£0	£150,000	£50,000	£100,000	£150,000	£0	R123 CIL
TTS 115	Transport	Legible London Earls Court	A wayfinding strategy, based on the principles of Legible London, should be implemented across the area to encourage and enable more trips by foot.	10	T67	-	Fulham (inc. Earls Court)	TfL	2013	2031	£36,000	£0	£36,000	£36,000	£0	£36,000	£0	S106
TTS 116	Transport	Thames Path Chiswick Mall to Hammersmith Terrace	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T79	-	Borough		2013	2031	£80,000	£0	£80,000	£0	£0	£0	£80,000	R123 CIL
TTS 117	Transport	Thames Path Black Lion Lane to Oil Mill Lane	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T80	-	Borough		2013	2031	£25,000	£0	£25,000	£0	£0	£0	£25,000	R123 CIL
TTS 118	Transport	Thames Path Linden House to Furnivall Gardens	Footway improvements are required outside Linden House where additional trees and biodiversity/green infrastructure are required as per Riverside Walk Enhancement Report.	52	T81	-	Hammersmith		2013	2031	£50,000	£0	£50,000	£0	£0	£0	£50,000	R123 CIL
TTS 119	Transport	Thames Path Furnivall Gardens	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T82	-	Hammersmith		2013	2031	£100,000	£0	£100,000	£0	£0	£0	£100,000	R123 CIL
TTS 120	Transport	Thames Path Lower Mall	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T83	-	Hammersmith		2013	2031	£30,000	£0	£30,000	£0	£0	£0	£30,000	R123 CIL
TTS 121	Transport	Thames Path Queen's Wharf to Chancellor's Wharf	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T84	-	Hammersmith		2013	2031	£40,000	£0	£40,000	£0	£0	£0	£40,000	R123 CIL
TTS 122	Transport	Thames Path Chancellor's Wharf to Greyhound Wharf	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T85	-	Hammersmith		2013	2014	£500,000	£0	£500,000	£0	£0	£0	£500,000	R123 CIL
TTS 123	Transport	Thames Path Greyhound Wharf to Fulham Football Ground	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T86	-	Borough		2013	2031	£100,000	£0	£100,000	£0	£0	£0	£100,000	R123 CIL
TTS 124	Transport	Thames Path Bishops Park	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T87	-	Borough		2013	2014	£500,000	£0	£500,000	£6,500	£0	£6,500	£493,500	R123 CIL
TTS 125	Transport	Thames Path Putney Bridge	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T88	-	Borough		2013	2031	£175,000	£0	£175,000	£0	£0	£0	£175,000	R123 CIL

Ref #	Sub-Category	Scheme	Description	Core Strategy	CIL PDCS	WC / SFR DIFS	Regen. Area	Other Agencies / Funding Sources	First Year £ Needed	Year Complete	Costs			Assumed / Committed Funding			Funding Gap	Proposed mechanism CIL S106 Site	
											Capital	Revenue / Year	Years	Total	Council / Gov't / Agencies / Other	S106			Total
TTS 126	Transport	Thames Path Hurlingham	Footway improvements to existing Thames Path route along Napier Road and Broomhouse Lane as per Riverside Walk Enhancement Report.	52	T89	-	Borough		2013	2031	£200,000	£0	£200,000	£0	£0	£0	£200,000	R123 CIL	
TTS 127	Transport	Thames Path Broomhouse Lane to Wandsworth Bridge	Reinstate the ecological planting at Broomhouse Drawdock and reinstate the Thames Path in the sections where it is non-existent. Investment in biodiversity/green infrastructure is required as per the Riverside Walk Enhancement Report.	52	T90	SF9	South Fulham		2013	2016	£50,000	£0	£50,000	£50,000	£0	£50,000	£0	R123 CIL	
TTS 128	Transport	Thames Path Wandsworth Bridge Pedestrian Link	Provide cantilevered path under Wandsworth Bridge as per Riverside Walk Enhancement Report.	52	T91	SF1	South Fulham		2022	2026	£500,000	£0	£500,000	£0	£0	£0	£500,000	R123 CIL	
TTS 129	Transport	Thames Path Wandsworth Bridge to Imperial Crescent	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T92	SF9	Fulham (inc. Earls Court)		2013	2016	£40,000	£0	£40,000	£40,000	£0	£40,000	£0	R123 CIL	
TTS 130	Transport	Thames Path Imperial Crescent to Lots Road	Improve existing Thames Path and provide biodiversity/green infrastructure improvements as per Riverside Walk Enhancement Report.	52	T93	SF9	South Fulham		2013	2016	£50,000	£0	£50,000	£50,000	£0	£50,000	£0	R123 CIL	
											£4,347,970,947	£15,741,671		£4,520,201,429	£2,598,439,360	£63,201,794	£2,661,641,154	£1,858,560,275	

Hammersmith & Fulham Community Infrastructure Levy Viability Study



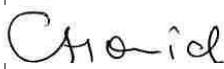
Final Report

London Borough of Hammersmith & Fulham



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1 INTRODUCTION

1.1.1 Hammersmith and Fulham Council is planning to introduce a Community Infrastructure Levy (CIL), and have appointed Peter Brett Associates to assess development viability in their areas and recommend CIL charging rates accordingly. This report provides our analysis and recommendations.

1.1.2 Following this introduction:

- In Chapter 2 we introduce the Community Infrastructure Levy and set out the legal requirements that a CIL charging schedule must comply with.
- Chapter 3 examines the planning and development context, in order to ensure that CIL supports development in the Borough as proposed in the Core Strategy.
- Chapter 4 sets out the method and assumptions used in our viability assessments.
- In Chapter 5 we undertake a market assessment of different land uses in the Borough and recommend CIL charges accordingly. We also recommend a standard charge for uses not separately covered.
- Chapter 6 summarises the suggested charges and recommends a proposed CIL Charging Schedule.

2 LEGAL REQUIREMENTS

2.1 Introduction

2.1.1 The Community Infrastructure Levy (CIL) is a planning charge based on legislation that came into force on 6 April 2010. The levy allows local authorities in England and Wales to raise contributions from development to help pay for infrastructure that is needed to support planned development as a whole. It is still possible for S106 obligations to be used to fund site specific infrastructure, subject to limits on pooling obligations for particular purposes. Local authorities who wish to charge the levy must produce a draft charging schedule setting out CIL rates for their areas – which are to be expressed as pounds (£) per square metre, as CIL will be levied on the gross internal floorspace of the net additional liable development. Before it is approved by the Council, the draft schedule has to be tested by an independent examiner.

2.1.2 The requirements which a CIL charging schedule has to meet are set out in:

- The Planning Act 2008 as amended by the Localism Act 2011.
- The CIL Regulations 2010¹, as amended in 2011², 2012³, 2013⁴ and 2014⁵.
- The National Planning Practice Guidance on CIL (NPPG CIL) issued under S221 of the Planning Act 2008, which is statutory guidance, i.e. it has the force of law and the authority must have regard to the guidance⁶.

2.1.3 Below, we summarise the key points from these various documents.

2.2 Striking the appropriate balance

2.2.1 The revised Regulation 14 requires that a charging authority '*strike an appropriate balance*' between:

- a) The desirability of funding from CIL (in whole or in part) the... cost of infrastructure required to support the development of its area... and
- b) The potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area.

2.2.2 By itself, this statement is not easy to interpret. The June 2014 statutory guidance explains its meaning. A key feature of the 2014 Regulations is to give legal effect to the requirement in this guidance for an authority to 'show and explain...' their approach at examination. This explanation is important and worth quoting at length:

The levy is expected to have a positive economic effect on development across a local plan area. When deciding the levy rates an appropriate balance must be struck between additional investment to support development and the potential effect on the viability of developments. This balance is at the centre of the charge-setting process. In meeting the regulatory requirements (see Regulation 14(1)), charging authorities should be able to show and explain

¹ http://www.legislation.gov.uk/ukdsi/2010/9780111492390/pdfs/ukdsi_9780111492390_en.pdf

² http://www.legislation.gov.uk/ukdsi/2011/9780111506301/pdfs/ukdsi_9780111506301_en.pdf

³ http://www.legislation.gov.uk/uksi/2012/2975/pdfs/uksi_20122975_en.pdf

⁴ http://www.legislation.gov.uk/uksi/2013/982/pdfs/uksi_20130982_en.pdf

⁵ http://www.legislation.gov.uk/ukdsi/2014/9780111106761/pdfs/ukdsi_9780111106761_en.pdf

⁶ DCLG (June 2014) *National Planning Practice Guidance: Community Infrastructure Levy (NPPG CIL)*

how their proposed levy rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area. As set out in the National Planning Policy Framework in England (paragraphs 173 – 177), the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.⁷

2.2.3 In other words, the ‘appropriate balance’ is the level of CIL which maximises the delivery of development in the area. If the CIL charging rate is above this appropriate level, there will be less development than planned, because CIL will make too many potential developments unviable. Conversely, if the charging rates are below the appropriate level, development will also be compromised, because it will be constrained by insufficient infrastructure.

2.2.4 Achieving an appropriate balance is a matter of judgement. It is not surprising, therefore, that charging authorities are allowed some discretion in this matter. Regulation 14 requires that in setting levy rates, the Charging Authority (our underlining highlights the discretion):

‘must strike an appropriate balance...’ ie. it is recognised there is no one perfect balance;

and the June 2014 statutory guidance says

*A charging authority must use ‘appropriate available evidence’... to inform their draft charging schedule... A charging authority’s proposed rate or rates should be reasonable, given the available evidence, but there is no requirement for a proposed rate to exactly mirror the evidence... There is room for some pragmatism.*⁸

2.2.5 The statutory guidance sets the delivery of development in the area firmly in the context of implementing the Core Strategy. This is linked to the plan viability requirements of the NPPF, particularly paragraphs 173 and 174. This point is given emphasis throughout the guidance. For example, in guiding examiners, the guidance makes it clear that the independent examiner should establish that:

*‘.....evidence has been provided that shows the proposed rate (or rates) would not threaten delivery of the relevant Plan as a whole.’*⁹

2.2.6 This also makes the point that viability is not simply a site specific issue but one for the plan as a whole.

2.2.7 The revised Regulation 14 effectively continues to recognise that the introduction of CIL may put some potential development sites at risk. The focus is on seeking to ensure development envisaged by the Core Strategy can be delivered. Accordingly, when considering evidence the guidance requires that charging authorities should ‘*use an area-based approach, involving a broad test of viability across their area*’, supplemented by sampling ‘*...an appropriate range of types of sites across its area...*’ with the focus ‘*...on strategic sites on which the relevant Plan... relies...*’¹⁰

2.2.8 This reinforces the message that charging rates do not need to be so low that CIL does not make any individual development schemes unviable. The levy may put some schemes at risk in this way so long as, in aiming strike an appropriate balance overall, it avoids threatening the ability to develop viably the sites and scale of development identified in the Core Strategy.

⁷ DCLG (June 2014) *NPPG CIL* (para.009)

⁸ DCLG (June 2014) *NPPG CIL* (para 019)

⁹ DCLG (June 2014) *NPPG CIL* (Para 038)

¹⁰ DCLG (June 2014) *NPPG CIL* (Para 019)

2.3 Keeping clear of the ceiling

2.3.1 The guidance advises that CIL rates should not be set at the very margin of viability, partly in order that they may remain robust over time as circumstances change:

*'It would be appropriate to ensure that a 'buffer' or margin is included, so that the levy rate is able to support development when economic circumstances adjust'*¹¹

2.3.2 We would add two further reasons for a cautious approach to rate-setting, which stops short of the margin of viability:

- Values and costs vary widely between individual sites and over time, in ways that cannot be fully captured by the viability calculations in the CIL evidence base.
- A charge that aims to extract the absolute maximum would be strenuously opposed by landowners and developers, which would make CIL difficult to implement and put the overall development of the area at serious risk.

2.4 Varying the charge

2.4.1 CIL Regulations (Regulation 13) currently allow the charging authority to introduce charge variations by geographical zone in its area, by use of buildings, or both. (It is worth noting that the phrase 'use of buildings' indicates something distinct from 'land use').¹² The 2014 Regulations also allow variations by 'intended gross internal area of development' (where 'development' means buildings) or by 'the intended number of dwellings or units'. As part of this, some rates may be set at zero (which could still allow some infrastructure to be provided through S106 agreement(s), where appropriate). But variations must reflect differences in viability; they cannot be based on policy boundaries. Nor should differential rates be set by reference to the costs of infrastructure.

2.4.2 The guidance also points out that there are benefits in keeping a single rate, because that is simpler, and charging authorities should avoid 'undue complexity'.¹³

2.4.3 Moreover, generally speaking, '*differential rates should not have a disproportionate impact on particular sectors, or specialist forms of development*'; otherwise the CIL may fall foul of State Aid rules.¹⁴

2.4.4 It is worth noting, however, that the guidance is clear that '*If the evidence shows that the area includes a zone, which could be a strategic site, which has low, very low or zero viability, the charging authority should consider setting a low or zero levy rate in that area.*'¹⁵

2.5 Supporting evidence

2.5.1 The legislation requires a charging authority to use '*appropriate available evidence*' to inform their charging schedules¹⁶. The statutory guidance expands on this, explaining that the available data 'is unlikely to be fully comprehensive'.¹⁷

¹¹ DCLG (June 2014) *NPPG CIL* (Para 019)

¹² The Regulations allow differentiation by "uses of development". "Development" is specially defined for CIL to include only 'buildings', it does not have the wider 'land use' meaning from TCPA 1990, except where the reference is to development of the area, in which case it does have the wider definition. See S 209(1) of PA 2008, Reg 2(2), and Reg 6.

¹³ DCLG (June 2014) *NPPG CIL* (Para 021)

¹⁴ DCLG (February 2014) *NPPG CIL* (Para 021)

¹⁵ DCLG (February 2014) *NPPG CIL* (Para 021)

2.5.2 These statements are important, because they indicate that the evidence supporting CIL charging rates should be proportionate, avoiding excessive detail. One implication of this is that we should not waste time and cost analysing types of development that will not have significant impacts, either on total CIL receipts or on the overall development of the area as set out in the Core Strategy. This suggests that the viability calculations may leave aside geographical areas and types of development which are expected to see little or no development over the plan period.

2.6 Chargeable floorspace

2.6.1 CIL will be payable on most buildings that people normally use. It will be levied on the net additional floorspace created by any given development scheme¹⁸. Any new build that replaces existing floorspace that has been in use for six months in the last three years on the same site will be exempt from CIL, even if the new floorspace belongs to a higher-value use than the old.

2.7 What the examiner will be looking for

2.7.1 According to statutory guidance, the independent examiner should check that:

- The charging authority has complied with the requirements set out in legislation.
- The charging authority's draft charging schedule is supported by background documents containing appropriate available evidence.
- The proposed rate or rates are informed by and consistent with, the evidence on economic viability across the charging authority's area.
- Evidence has been provided that shows the proposed rate would not threaten delivery of the relevant Plan as a whole.¹⁹

2.8 Policy and other requirements

2.8.1 Above, we have dealt with legal and statutory guidance requirements which are specific to establishing a CIL. More broadly, the guidance says that charging authorities '*should consider relevant national planning policy... when drawing up their charging schedules*²⁰. In addition, where consideration of development viability is concerned, the guidance draws specific attention to paragraphs 173 to 177 of the NPPF.

2.8.2 The only policy requirements which relate directly to CIL are set out at paragraph 175 of the NPPF, covering, firstly, working up CIL alongside the plan making where practical; and secondly placing control over a meaningful proportion of funds raised with neighbourhoods where development takes place. Since April 2013²¹ this policy requirement has been complemented with a legal duty on charging authorities to pass a specified proportion of CIL receipts to local councils, to spend it on behalf of the neighbourhood if there is no local council for the area where development takes place. Whilst important considerations, these two points are outside the immediate remit of this study.

¹⁶ Section 211 (7A) of the Planning Act 2008

¹⁷ DCLG (February 2014) *NPPG CIL* (Para 019)

¹⁸ DCLG (February 2014) *NPPG CIL* (para 002)

¹⁹ DCLG (June 2014) *NPPG CIL* (Para 038)

²⁰ DCLG (June 2014) *NPPG* (Para 011)

²¹ http://www.legislation.gov.uk/ukxi/2013/982/pdfs/ukxi_20130982_en.pdf

2.9 Summary

2.9.1 To meet legal requirements and satisfy the independent examiner, a CIL charging schedule published as a Draft for consultation should:

'strike an appropriate balance' between the need to fund infrastructure and the impact of CIL;
and

'Not threaten delivery of the relevant plan as a whole'.

2.9.2 As explained in statutory guidance, this means that the net effect of the levy on total development across the area should be positive. CIL may reduce development by making certain schemes which are not plan priorities unviable. Conversely, it may increase development by funding infrastructure that would not otherwise be provided, which in turn supports development that otherwise would not happen. The law requires that the net outcome of these two impacts should be judged to be positive. This judgment is at the core of the charge-setting and examination process.

2.9.3 Legislation and guidance also set out that:

- Authorities should avoid setting charges up to the margin of viability for the bulk of sites.
- CIL charging rates may vary across geographical zones, building uses, and, under the 2014 Regulations, scale of development (and only across these three factors). But there are restrictions on this differential charging. It must be justified by differences in development viability, not by policy or by varying infrastructure costs; it should not introduce undue complexity; and it should have regard to State Aid rules.
- Charging rates should be informed by 'appropriate available evidence', which need not be 'fully comprehensive or exhaustive'.

2.9.4 While charging rates should be consistent with the evidence, they are not required to 'mirror' the evidence²². In this, and other ways, charging authorities have discretion in setting charging rates.

2.9.5 In our analysis and recommendations, we aim both to meet these legal and statutory guidance requirements and to maximise achievement of the Councils' own priorities, using the discretion that the legislation and guidance allow.

²² Planning Act 2008 (Section 212 (4) (b))

3 PLANNING AND DEVELOPMENT CONTEXT

3.1 Introduction

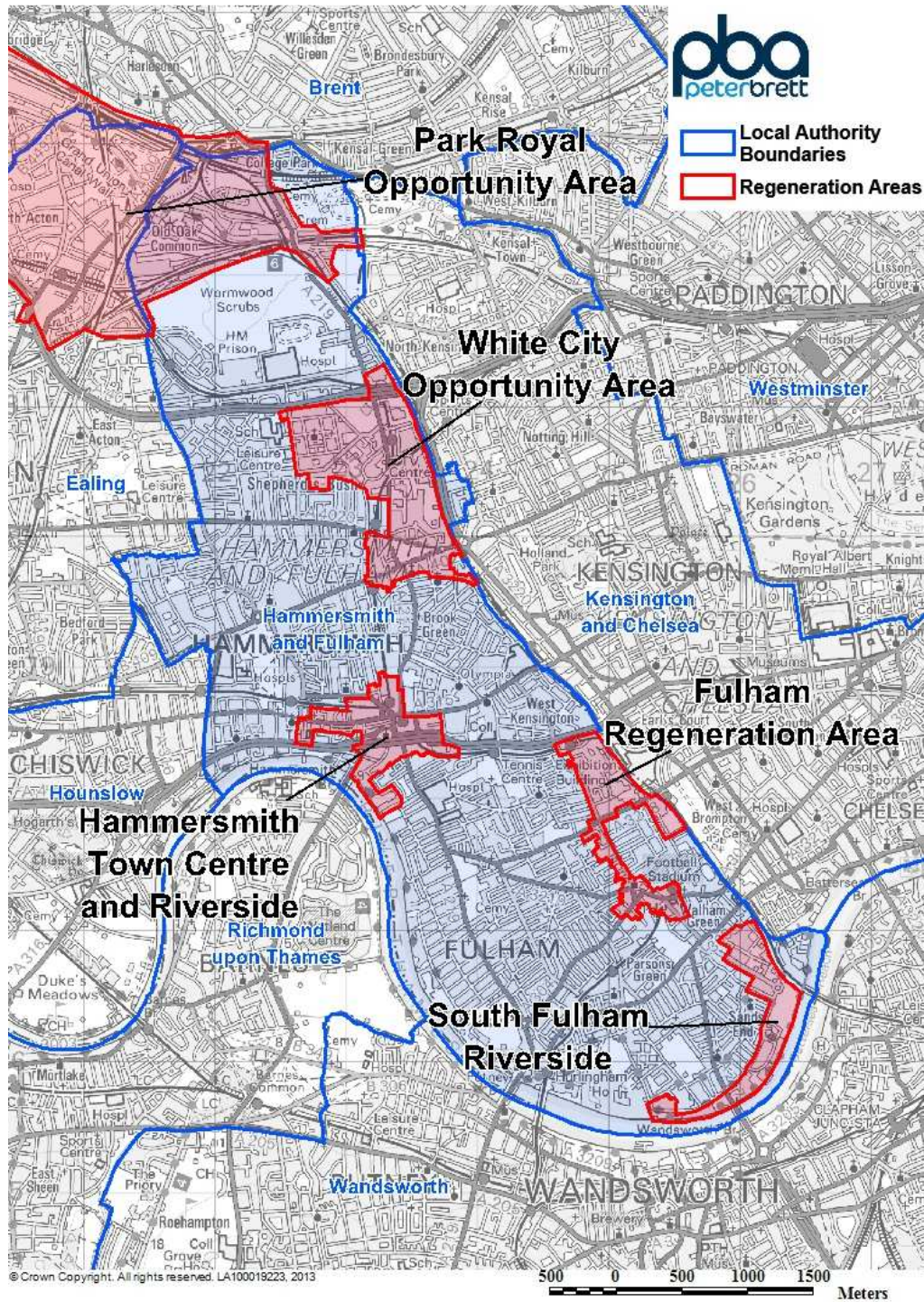
- 3.1.1 We need to ensure that a CIL supports development in the Borough in general and also enables delivery of the Council's priorities. In this chapter we therefore review recent patterns of development and the objectives and proposals of the Borough's Core Strategy²³.
- 3.1.2 At the end of this chapter, we look at the implications of this analysis for the charging schedule.

3.2 Policy Context

- 3.2.1 We have undertaken a brief policy review in order to inform our analysis of the land uses which are central to the delivery of the Core Strategy, or otherwise likely to be significant forms of development. The policy review is only intended to focus on issues relevant to CIL.
- 3.2.2 The Hammersmith and Fulham Core Strategy was adopted in October 2011 and the Development Management ('DM') Local Plan was adopted in July 2013 and, together, these documents represent the 'Local Plan' for the Borough. The Core Strategy vision identifies the main regeneration areas in the Borough as the wider White City Opportunity Area (including Shepherds Bush Town Centre) and Fulham Regeneration Area (including Earls Court and West Kensington), as well as South Fulham Riverside, Hammersmith Town Centre and Riverside and Park Royal Opportunity Area. It should be noted that the council has also adopted Supplementary Planning Documents (SPDs) for the White City (October 2013), Earls Court and West Kensington (March 2012) and South Fulham Riverside (January 2013) areas, each supported by their own background viability and infrastructure evidence bases (discussed further in 5.7). The regeneration areas are shown in Figure 3.1.

²³ Hammersmith and Fulham Council (2011), *Core Strategy*

Figure 3.1 Core Strategy Regeneration Areas in the Borough



Residential

- 3.2.3 At least 14,400 dwellings are to be delivered in the Borough up to 2032 as per the Core Strategy. This is split as shown in Table 3.1:

Table 3.1 Indicative Housing Numbers

Area	2012/17	2017/22	Total 10 years	2022/27	2027/32	Total 20 years
White City Opportunity Area	1,200	1,400	2,600	1,300	1,100	5,000
Hammersmith Town Centre and Riverside	500	500	1,000	0	0	1,000
Fulham Regeneration Area (including Earls Court and West Kensington Opportunity Area)	700	700	1,400	1,200	800	3,400
South Fulham Riverside	800	800	1,600	400	200	2,200
Park Royal Opportunity Area	0	0	0	400	1,200	1,600
Rest of the Borough	1,000	200	1,200	0	0	1,200
Total	4,200	3,600	7,800	3,300	3,300	14,400
Average/year	840	720	780	660	640	720
Maximum for infrastructure planning purposes			9,000			20,000

Source: Hammersmith & Fulham Core Strategy, October 2011, Borough Wide Strategic Policy H1 Indicative Housing Targets

(See relevant SPDs and associated background documents for more detailed phasing)

- 3.2.4 Half of this development is in White City (5,000 dwellings) and South Fulham Riverside (2,200 dwellings) and much of this is expected to come forward in the first ten years of the plan period. However there is still a significant proportion to be delivered in other locations – including 1,000 dwellings in Hammersmith Town Centre and Riverside, 3,400 dwellings in the Fulham Regeneration Area (it should be noted that this figure is likely to be exceeded in the Earls Court and West Kensington Opportunity Area in light of approved schemes) and 1,600 dwellings at Park Royal. In Hammersmith Town Centre, the total housing requirement is expected to come forward by 2022, which further emphasises the importance of maximising the potential funds available from CIL in order to support the delivery of the infrastructure needed to support this growth.
- 3.2.5 Policy H3 of the Core Strategy states that in existing residential areas, and in substantial parts of the regeneration areas, new housing provision will be expected to be predominantly

medium to low rise and consist of a range of housing typologies. Policy H4 states that there should be a mix of housing types and sizes in development schemes, especially increasing the proportion of family accommodation. There is also an aspiration to increase home ownership and the proportion of affordable housing in intermediate and affordable rented tenure. The Borough has set a target for affordable housing provision up to 2021 of 40%, with a 'preference' for intermediate tenure unless a small amount of social rented housing is necessary to allow estate regeneration or for the replacement of unsatisfactory accommodation (Policy H2).

Employment

- 3.2.6 The focus in the Core Strategy is on providing sufficient accommodation for all size of businesses including small and medium sized businesses (Policy LE1). One solution is to seek flexible space as part of large new business developments.
- 3.2.7 Equally the need for new office space is considerable. The London Office Policy Review (2012) identifies a need for additional floorspace of some 320,000m² (GIA) across the Borough from 2011 to 2031. The Core Strategy is seeking to enable more office floorspace to come forward – predominantly through existing permissions and expected growth in the town centres (particularly Hammersmith) and the Opportunity Areas (White City and Earls Court and West Kensington).
- 3.2.8 Employment policy (Strategic Policy B) sets out the locational vision for the growth of different types of economic activity. Outside the identified areas the change of use to residential or mixed use of existing employment sites will be considered where these are unused or underused.
- 3.2.9 The Core Strategy sets out the designation of the Park Royal Opportunity Area as an employment zone, which is also allocated as a Strategic Industrial Location within the London Plan. The priority at Park Royal, as set out in the Core Strategy, is therefore to protect land for industrial, warehouse and small scale office use, research and development and waste and recycling activities.

Retail

- 3.2.10 The Core Strategy (Strategic Policy C) sets out that there are three established town centres within the Borough – Hammersmith, Fulham and Shepherd's Bush – as well as a number of local centres and smaller shopping parades. The Core Strategy advocates the regeneration of Hammersmith and Fulham town centres, and a key component in this is to ensure that there is sufficient capacity for new retail floorspace in line with identified need (including evidence for quantitative need for retail floor space in West London prepared by Experian on behalf of the GLA).

3.2.11 The Joint West London Retail Needs Study 2010 (WLRNS) has identified future estimated retail need in the Borough and within the three town centres up to 2021. The findings of the study are set out in Table 3.2.

Table 3.2 West London Retail Needs Study 2010 – Estimated Retail Need (Hammersmith & Fulham Core Strategy, 2011)

	Borough Wide (Sq M Gross)	Hammersmith (Sq M Gross)	Fulham (Sq M Gross)	Shepherds Bush (Sq M Gross)
Comparison	74,500	17,200	7,800	41,400
*Convenience	7,600	2,200	1,100	4,300
A3-A5	11,100	2,800	2,600	4,000
*Convenience figures based on supermarket sales densities (Source: West London Retail Needs Study 2010)				

3.2.12 The Core Strategy sets out that the Council is aiming to meet future need predominantly within the established shopping hierarchy. It recognises that the opening of the Westfield London shopping centre in 2008 led to the re-designation of Shepherds Bush as a Metropolitan Town Centre in the London Plan.

Hotels

3.2.13 The Core Strategy states that hotel development may be supported in some of the Borough's regeneration areas and DM Policy B2 'Provision for visitor accommodation and facilities' elaborates on this further.

3.3 Summary

3.3.1 The land uses which are central to delivery of the Core Strategy or are otherwise likely to be significant forms of development comprise:

- Residential
- Offices
- Industrial
- Retail.

3.3.2 In our viability assessments and the resulting recommendations, we have focussed on these types of development, aiming to ensure that they remain broadly viable after the CIL charge is levied.

4 VIABILITY ASSESSMENT METHOD

4.1.1 We now consider in detail the approach used for the Borough-wide CIL study.

4.2 Development Appraisal Model Approach

4.2.1 Viability assessment is at the core of the charge-setting process. The purpose of the assessment is to identify charging rates at which the bulk of the development proposed in the development plan is financially viable, in order to ensure that the CIL does not put at risk the overall level of development planned for the area.

4.2.2 Our viability assessments are based on development appraisals of hypothetical schemes using the residual valuation method. This approach is in line with accepted practice and as recommended by RICS guidance²⁴, the Harman report²⁵ and National Planning Practice Guidance (NPPG)²⁶ on viability. Residual valuation is applied to different land uses and where relevant to different parts of the Borough, aiming to show typical values for each. It is based on the following formula:

Value of completed development scheme

Less development costs - including build costs, fees, finance costs etc

Less developer's return (profit) – the minimum profit acceptable in the market to undertake the scheme

Less policy costs – building in (for example) S106 costs and other policy requirements

Equals residual land value

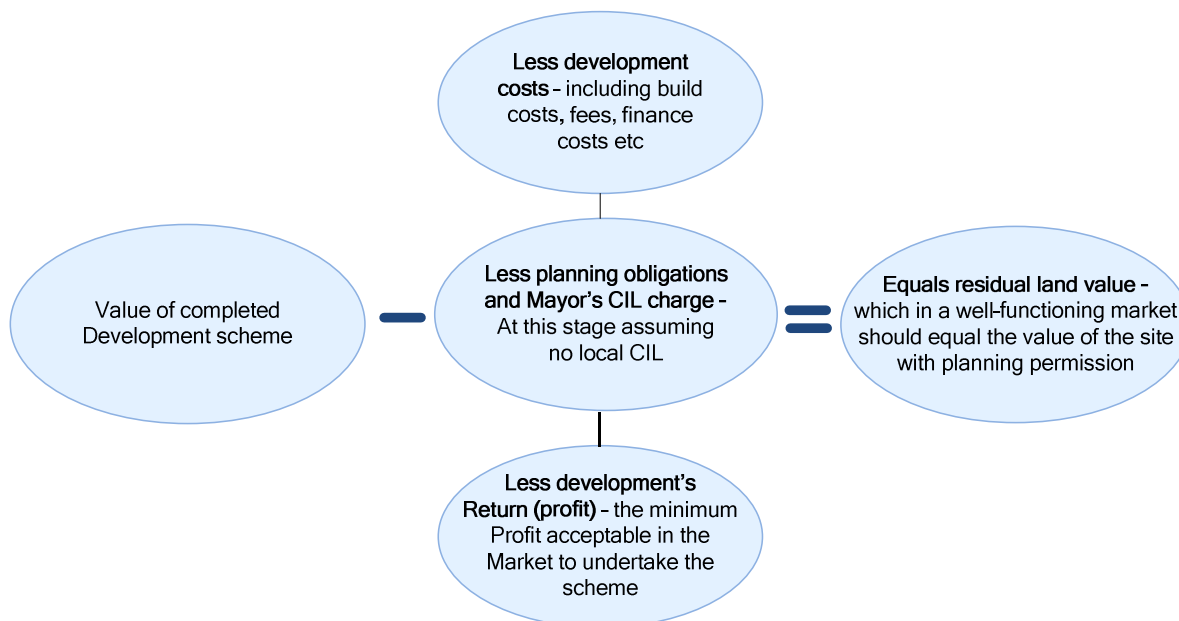
– which in a well-functioning market should equal the value of the site with planning permission.

²⁴ RICS (2012), *Financial Viability in Planning, RICS First Edition Guidance Note*

²⁵ Local Housing Delivery Group Chaired by Sir John Harman (2012) *Viability Testing Local Plans*

²⁶ DCLG (2014) *National Planning Practice Guidance: Viability*

Figure 4.1 Method Diagram



Source: PBA

- 4.2.3 For each of the hypothetical schemes tested, we use this formula to estimate typical residual land values, which is what the site should be worth once it has full planning permission. The residual value calculation requires a wide range of inputs, or assumptions, including the costs of development and the required developer's return.
- 4.2.4 The arithmetic of residual appraisal is straightforward (we use a bespoke spreadsheet model for residential appraisals. Calculation inputs are hard to determine for a specific site (as demonstrated by the complexity of many S106 negotiations), with difficulties arising from undertaking calculations that represent a typical or average site. Our viability assessments are therefore necessarily broad approximations and subject to a margin of uncertainty.
- 4.2.5 Detailed individual viability appraisals are included at **Appendix C** .

4.3 Development Scenarios

Assumption Inputs to Modelling are Critical to Determining Accuracy

- 4.3.1 The accuracy of an appraisal model depends primarily on the accuracy of the underlying assumptions rather than on the complexity of the calculation. Our approach is therefore to focus on the tone of value and market trends within the Borough.
- 4.3.2 In the calculation we have used 'readily available evidence', which has been informed and adjusted by an assessment of the local transactions and market demand. All of the assumptions used are based on conversations with local agents, Registered Providers, evidence of transactions on databases such as EGi and Focus and our own in-house industry knowledge. As the inputs are paramount to the outcome of the viability appraisals we have included at **Appendix C** a full summary of assumptions for each of the appraisals undertaken which complements the further narrative on assumptions in each 'Market Context' section in section 5.
- 4.3.3 Because they are not focused on specific sites, calculations of this type cannot be precise. Instead they produce a high level assessment of viability and deliverability for the majority of

(but not necessarily all) development in an area. Hammersmith and Fulham presents its own challenges in the context of charge setting for the following reasons:

- All sites are inherently different in the Borough - nearly all have previously been developed and have a unique set of ground and development challenges. Many sites in the higher value areas (in the south) have several alternative viable uses.
- Land comparable evidence will therefore be subject to wide variations and needs careful analysis. The 'worth' of land is very much linked to specific development schemes rather than a generic tone of value across the Borough.

4.3.4 As previously stated our assumptions are based on readily available evidence and it is necessary for us to make generic assumptions about land values and the potential uplifts a landowner might seek from an existing use to a higher alternative use. There are no specific rules regarding what this uplift might be and whenever possible we have used local comparable evidence from agents and landowners.

Residential Densities

4.3.5 One variable important in assessing the viability of residential development is density. It is appropriate to test scenarios that reflect recent emerging experience and expectations for new schemes by developers, coupled with policy aspirations for particular types of housing.

4.3.6 Analysis of the Strategic Housing Land Availability Assessment (SHLAA) sites which support the Core Strategy gives a good understanding of the densities which are anticipated across the Borough as part of its future housing supply.

4.3.7 The SHLAA data can be complemented by analysis of completions and approvals in the London Development Database (LDD) which provides evidence of densities being granted permission and being delivered.

4.3.8 Across these two data sources, it was considered that densities for the viability appraisals should reflect the range of densities expected to come forward and take into account the London Plan's density matrix. Site density has a significant impact on viability. Our appraisals have assumed densities for apartment schemes of 150 dph to 300 dph and for housing schemes, we have assumed densities of 100 dph. Detail on the residential densities assumed can be found in **Appendix A**.

4.3.9 Most housing – as distinct from apartment – schemes would be expected to be in the lower part of the density range and the low figure of 100dph provides a reasonable proxy for testing the market for a proportion of family housing in medium rise developments - a policy aspiration in the Core Strategy. In any particular case the acceptable density of a proposed development would depend on a range of factors.

Cost and S106 Estimates

4.3.10 We have based our cost estimates on BCIS indices (upper quartile data use for residential) with appropriate regional and Borough-specific adjustments for the brownfield nature of development sites in the area. This:

- assists with the effort to make a proper allowance for the increase in costs contingent upon the requirement to comply with the revisions to Part L of the Building Regulations; and
- helps to match the types of building implied by the cost estimates with the type identified as comparators when assessing values;

- 4.3.11 We have used high level approximations of the additional costs involved such as site preparation, external works, fees, finance and developer's profit margins. These represent the average over a range of scheme types. In practice there is wide variation depending on the specific site and proposal.
- 4.3.12 On site preparation for internal access road and other external works will vary from site to site, these costs have been reflected in the 5% of external works. We have further assumed that more significant costs bespoke to a particular site would be reflected by the developer in the purchase price upon acquisition. The point identified about demolition is an important one in Hammersmith and Fulham. Many of the sites that come forward will result in the loss of some existing space on a site, i.e. the net additional space created will be lower than for a previously cleared site. It is simply not possible to make assumptions about the nature of existing space and therefore the costs of clearing the site (beyond standard assumptions regarding demolition). However, in order to recognise this issue we have deliberately built a reasonable amount of slack into the appraisals to allow for such costs. For example, where demolished floorspace satisfies the 'in use' test in the CIL Regulations, there would be a reduction in the CIL liability, thus going some way to covering the costs of demolition.
- 4.3.13 It should be noted that the overage shown by the appraisals represents both what could pay for a possible CIL charge and/or possible S106. The recommended CIL charge calculated from the overage is significantly below the highest levels that our appraisals suggest development could afford, so as not to put development in Hammersmith and Fulham at risk.
- 4.3.14 The appraisals allow for Mayoral CIL and a de minimis S106 contribution within the appraisals (£1,000 per dwelling for residential schemes). Meaning that the remaining overage represents the potential level of CIL and/or S106, depending on site specific need and the strategy desired by the Council.

4.4 The Summary Tables

- 4.4.1 Having estimated the residual value, we compare it with the 'benchmark land value' or 'land cost', which is the minimum land value the landowner is likely to accept to release their land for the development specified which will include existing use plus hope value.
- 4.4.2 Our estimates of benchmark land values are based on market comparables (see Appendix A and the tables in Chapter 5). Actual site values will vary to reflect the landowner's judgement and the extent to which the landowner takes account of the contextual nature of development, the site density achievable, the approach to the delivery of affordable housing (in the context of residential development), abnormal or site specific costs and expected S106 requirements and so on. It should also be noted that land values should ultimately be reduced to take account of CIL as suggested in the examiner's report into the Mayor of London's CIL²⁷. There are a wide range of permutations here. In order to make progress, we have to assume a central benchmark value, even though there could be a margin of error in practice.
- 4.4.3 The process of comparison of residual and benchmark land values takes place in what we call the 'viability summary' tables. These can be found in the relevant sections and the first example in this report is found at Table 5.2. The summary tables show the overage per square metre (in the last column). If this is a positive amount because the residual land value shown by the appraisals is above the benchmark value, then development is viable. Given the uncertainties surrounding viability appraisal, it is of course an approximate indicator (due to the inherent uncertainties in development appraisals), which should be used cautiously.
- 4.4.4 The overage provides a broad indicator of the maximum level of CIL and/or additional S106 costs that the scheme may be able to carry, while still remaining viable. However, a proportion

²⁷ The Planning Inspectorate (2012) *Report on the Examination of the Draft Mayoral Community Infrastructure Levy Charging Schedule*

of the overage may also be needed to incentivise the landowner to bring forward the land for development or for particularly difficult sites to contribute towards abnormal development costs. Therefore, a sufficient difference between the proposed CIL charge and the overage needs to be left.

- 4.4.5 If the residual land value shown by the appraisals is below the benchmark value, the development is not financially viable, even without CIL. That means that unless circumstances change development will not happen.
- 4.4.6 It needs to be noted that our assumption of benchmark land value works on the basis that abnormal costs (e.g. decontamination, major services diversion, or major access requirements etc) will generally be reflected in a reduction in that land value. However, some sites may have a level of abnormal costs that are so great that the additional viability (i.e. the overage) will also need to contribute towards these costs.
- 4.4.7 The CIL charge is a relatively small proportion of total development costs and a flexible approach on other more influential policies that affect viability (e.g. site density, design quality, public open space) will allow the Council to adopt a bespoke approach to individual schemes. Table 6.2 summarises the proposed CIL charges as a % of Gross Development Value (GDV) to demonstrate that CIL represents a relatively small proportion of overall value.
- 4.4.8 It is important to bear in mind that these calculations are no more than approximations, surrounded by margins of uncertainty, but that they are based on best available evidence and judgement. In drawing the implications for CIL we take account of this uncertainty and use professional judgment to interpret the figures.

5 MARKET ASSESSMENT

5.1 Approach

- 5.1.1 The fundamental premise is that the Hammersmith & Fulham CIL must be set at a level that does not put at serious risk the delivery of the Core Strategy. Our starting point therefore must be to understand the key factors affecting development viability in the borough and what overall level of charge would not compromise viability for the majority of developments. To do this, it is necessary to understand the predominant land uses which have been developed over the last 5-10 years, along with a view of the land uses that are expected to represent the majority of change over the life of the Core Strategy. These are called the 'core' uses.
- 5.1.2 Most commonly the core uses in an area are residential, B-class commercial and retail uses. We assess the development activity of these in turn. At the same time, we consider the market context of each development type and undertake viability assessments in order to determine the possible level of CIL charge, as well as considering the proportion of the CIL charge as a % of GDV (see Table 6.2).
- 5.1.3 In respect of the viability assessment work, research of the market is difficult because of the confidential nature of many of these transactions and contractual arrangements behind the sales. Our information has been sourced from agents and developers which has revealed an extremely wide range of values. The highest uplifts from commercial land are in the southern part of the Borough with the lowest uplifts in the north. Our development appraisals are therefore based on benchmark land values (which we define in section 4) at between £4m and £23m per ha.
- 5.1.4 As stated in Section 4 of this report the benchmark land value is the minimum land value the landowner is likely to wish to accept to release their land for the development specified which will include existing use plus hope value.
- 5.1.5 A list of the consultees and sources which have informed the assumptions used in this study from PBA's direct research and from the Council's informal consultation are set out in **Appendix D**.

5.2 Residential

Market Context & Assumptions

- 5.2.1 The UK residential market is showing recovery. The Nationwide Building Society reported that the average UK house price in December 2013 was £175,826, 8.4% higher than December 2012
- 5.2.2 Average house prices and their annual change vary significantly across the UK. As shown in Table 5.1 the average house price in London is significantly higher than the surrounding areas of the South East, South West and the Midlands.

Table 5.1 Average House Prices & Annual Percentage Change – UK Regions (December 2013)

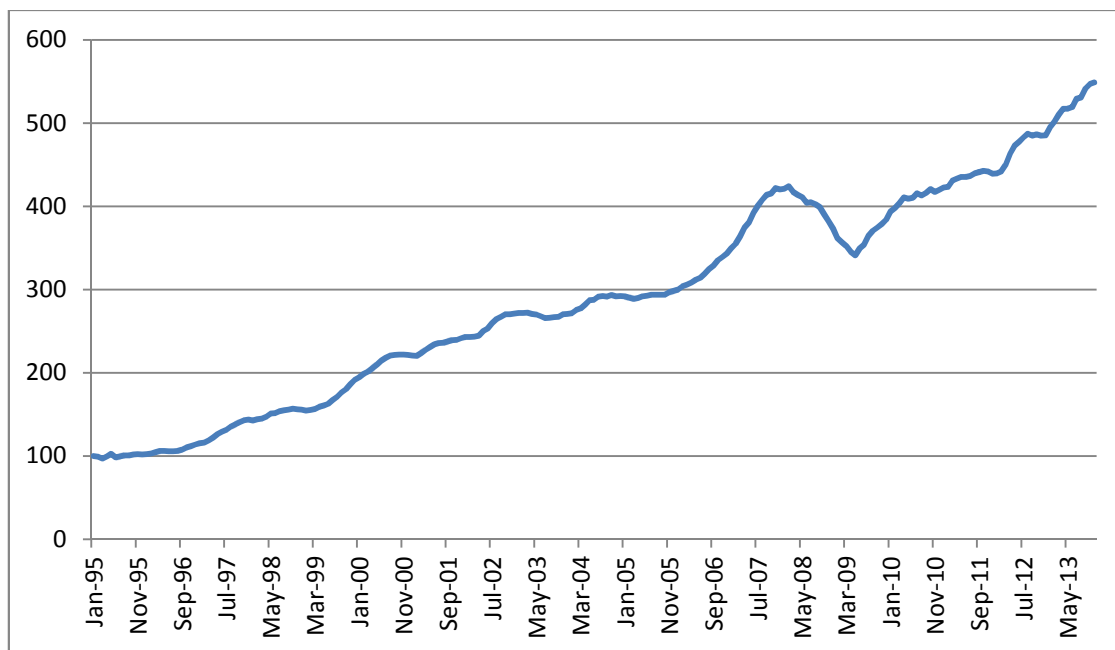
Region	Average Price	Annual % change
London	£345,186	14.9%
Outer Metropolitan	£267,682	8.6%
Outer South East	£213,007	7.6%

Region	Average Price	Annual % change
East Anglia	£176,939	7.4%
West Midlands	£153,965	6.2%
East Midlands	£146,964	6.1%
South West	£195,196	5.7%

Source: Nationwide House Price Index December 2013

- 5.2.3 A consequence of the prolonged economic downturn has meant, however, that the market has to some extent polarised - with developers and investors avoiding what is perceived as higher risk products and locations and focussing on tried and tested investment opportunities.
- 5.2.4 The implications of this changed development market are reflected within Hammersmith and Fulham. Due to its prime location on the edge of central London the performance of the housing market has been exceptionally strong. House price growth has been over 31% over the past five years (based on Land Registry data). This is shown in Figure 5.1. As a consequence, Hammersmith and Fulham remains of prime interest to developers and investors.

Figure 5.1 Local House Price Index – Hammersmith & Fulham



Source: Land Registry

Northern Zone

- 5.2.5 The northern housing market - effectively the part of the Borough north of Goldhawk Road - contains the key growth areas of White City and Park Royal. The overall tone of new build sale values are typically around £400psf - £560psf (£4,306/m² - £6,027/m²), although we are starting to see some evidence of prices moving towards £7,195/m². It is expected that residential development planned for these areas will further serve to increase values in the wider northern housing market because of the benefits created through the provision of enhanced infrastructure and capacity. Although the market is rising, we have used values in line with the general tone. In the area wide appraisals we have used £5,985/m² for apartments and £4,970/m² for houses.

Central Zone

5.2.6 North of Lillie Road and south of Shepherds Bush, values have markedly increased over the last few years, with new build sale asking prices for apartments are around £7,500/m²- £9,545/m² and houses £7,500/m² - £8,991/m². The very upper end prices for apartments is for very high specification space with onsite facilities, and we note that evidence of new build houses is limited in the this area. This area also includes potential large scale development opportunities around Earls Court and Hammersmith Town Centre. Developer interest in these areas remains keen and new build schemes are likely to improve current sales values in the short to medium term, particularly as place making starts to have an impact on the general environment. Based on the evidence we have used in the area wide appraisals £8,025/m² for apartments and £7,500/m² for houses. As the market is still developing we have selected values towards the lower end of the range identified in the evidence.

South Zone

- 5.2.7 Within the Borough itself the more valuable locations are in the southern area around Parsons Green and the north bank of the River Thames. Our own research shows that values are heavily influenced by access to waterside views and the specification of accommodation on offer. Evidence would suggest that asking values are now between £1,102 psf - £1,278 psf (£11,869/m² - £13,762/m²) to the very south of the borough and up to the riverside area. Moving further away from the river, around Parsons Green values are lower at around £773 psf - £1,053 psf (£8,322/m² - £11,337/m²). Within the riverside area in the south of the Borough, new build, single family houses (as distinct from apartments) remain at a premium in comparison to other areas in west London. Although limited, evidence would suggest that asking values are now around £1,159 psf (£12,479/m²) for new build high end accommodation.
- 5.2.8 The general outlook is perceived as increasingly positive with continuing evidence of rising sales and rental values helping to fuel developer interest even in relatively small infill residential development projects. Local agents have also confirmed that existing schemes at Chelsea Creek, Imperial Wharf, 70-74 Parsons Green Lane, and Farm Lane, along with numerous smaller projects, continue to achieve excellent sales values.
- 5.2.9 Based on the evidence, we have used in the area wide appraisals £1,057 psf (£11,385/m²) for apartments and £1,012 psf (£10,895/m²) for houses. The apartments representing higher values being achieved around Parsons Green and lower end of values south of the Borough and towards the riverside.
- 5.2.10 Further value can be generated from residential development across all the three zones identified by the sale of ground leases to investors and income from car parking. Our values exclude allowances for such income.

Other Regeneration Areas

5.2.11 In other parts of the Borough we have already seen the positive effect on values of enhanced infrastructure and capacity, and regeneration areas – for example Earls Court and White City East – will begin to create their own value identities once significant development starts to come forward and place-making in the areas starts to take shape. The Regeneration Areas and their related market context, assumptions and potential CIL/S106 charges, including for residential use, are discussed in more detail in section 5.7.

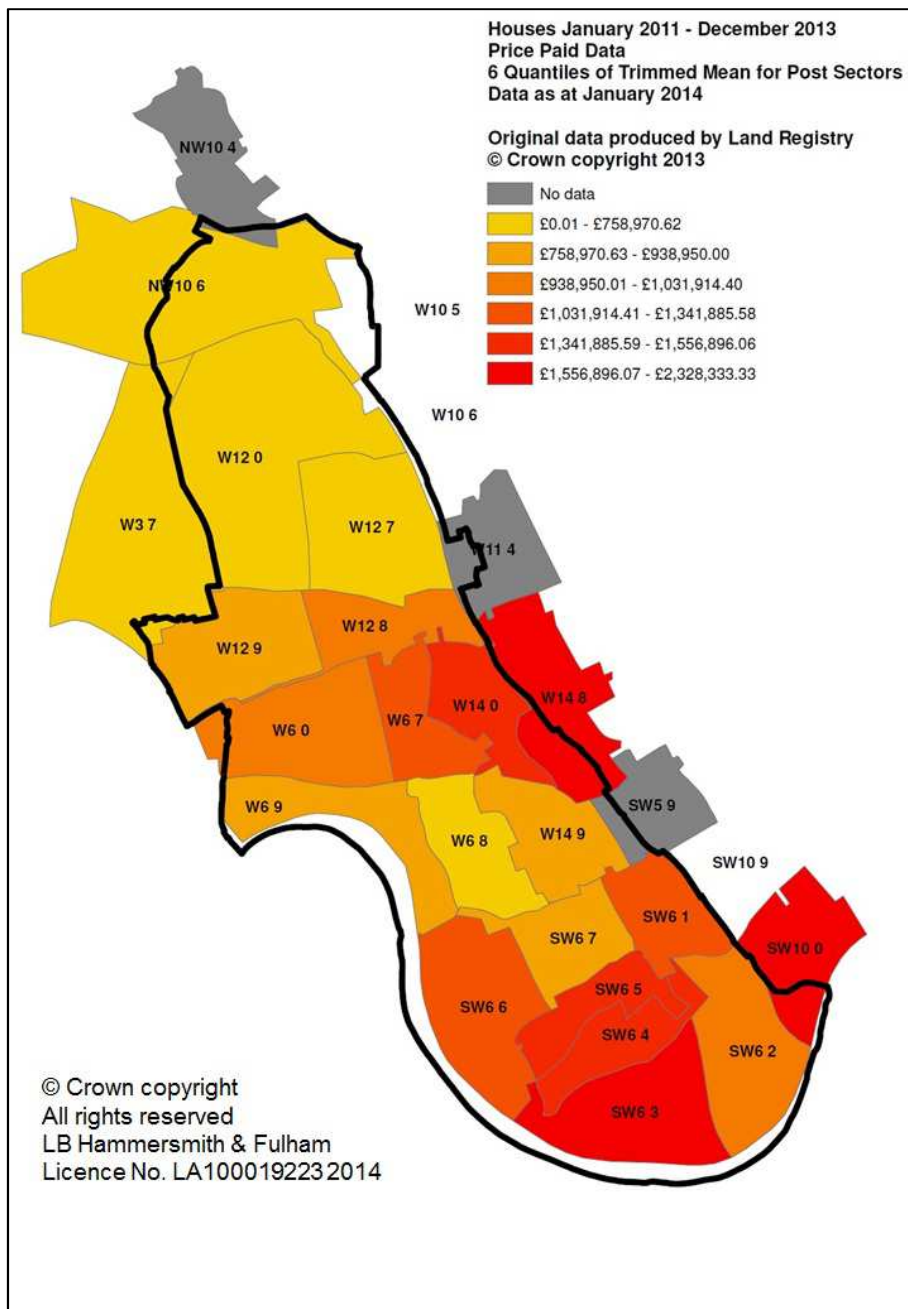
Summary

5.2.12 Therefore, in very broad terms, the Borough has three tiers of value (excluding White City East and Earls Court which are dealt with separately). These are:

- i. **North Zone** - Shepherds Bush, Old Oak, College Park and White City (excluding White City East);
- ii. **Central Zone** - Hammersmith, Brook Green, Barons Court and the northern part of Fulham; and
- iii. **South Zone** - Parsons Green, Fulham and Fulham Riverside.

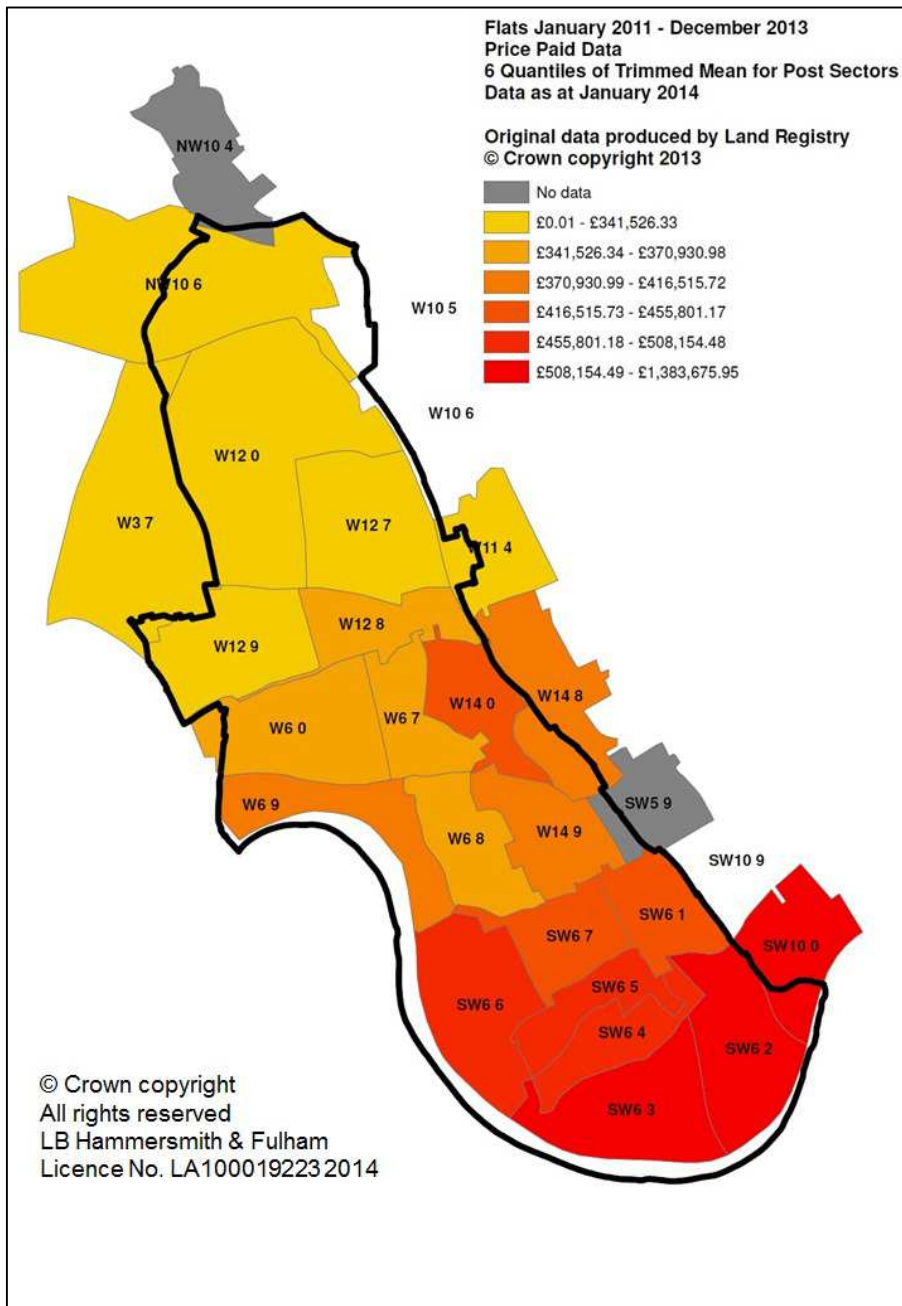
5.2.13 This is partly illustrated by the residential heat maps shown in Figure 5.2 and Figure 5.3 (although it should be noted that most of the transactions in the Land Registry dataset are of existing stock and not just new build):

Figure 5.2 Average Residential Prices, Houses Property



Source: Land Registry/LBHF

Figure 5.3 Average Residential Prices, Flatted Property



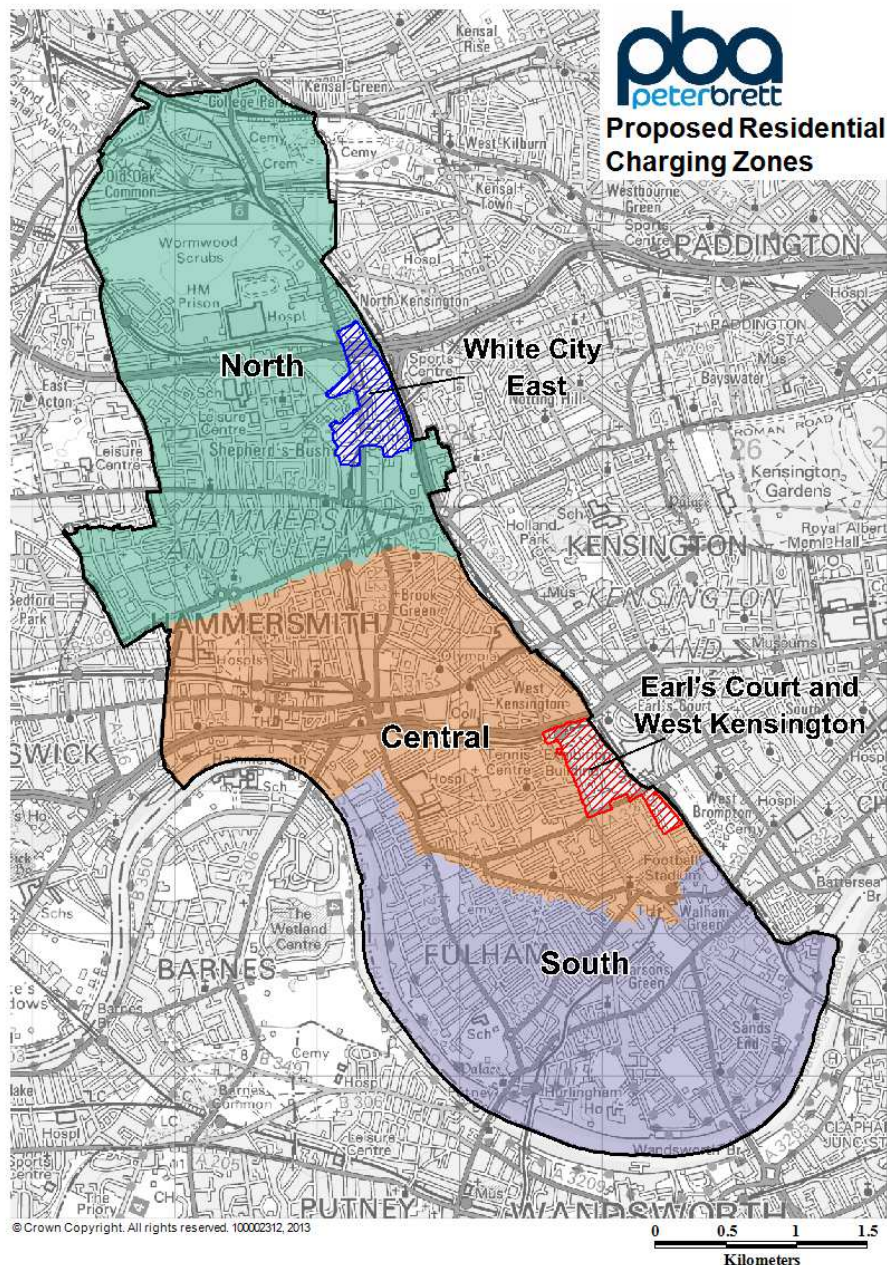
Source: Land Registry/LBHF

5.2.14 It is exceptionally difficult in areas adjacent to central London to draw any conclusions on the tone of value for potential residential land. Every site is effectively brownfield and has a significant value for an alternative use. The challenge for developers is to offer the landowner a significant premium once planning permission is secured, balanced against the collective public sector contribution for S106 payments, affordable housing and the community infrastructure levy. We have therefore focussed on employment land and allowed for appropriate uplifts. The uplift in value tends to be much higher in the south eastern and central areas of the Borough where the competition for development sites is much keener.

Potential Total CIL/S106 Contributions

5.2.15 Based on the available viability evidence within the Borough we are proposing three residential charge variations (excluding White City East and Earls Court which are dealt with separately). Figure 5.4 shows the extent of the proposed residential CIL charging zones in the Borough.

Figure 5.4 Proposed CIL Charging Zones for Residential Uses



Source: PBA/LBHF

Summary

5.2.16 Table 5-2 summarises the results of the residual appraisals and the benchmark land values in the Borough. Within each of the value zones we have carried out viability appraisals for a range of sample schemes. The different value assumptions are explained in **Appendix A**. The table shows the results of our appraisals:

Table 5.2 Residential Residual Appraisals and Benchmark Land Values

Ref		Dwellings	Commercial sq.m (GIA)	Net site area ha	Density	Total Floor Space sq.m	Residential CIL	Commercial CIL	Residual land value with policy contributions		Benchmark		Overage
		No.					Chargeable Floor Space sq.m	Chargeable Floor Space sq.m	Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
	Northern												
N1	Houses -	10		0.10	100	920	552		£15,023,878	£1,633	£5,700,000	£620	£1,013
N2	Flats -	50		0.33	150	3,750	2,250		£9,734,860	£865	£4,600,000	£409	£456
N3	Flats -	500		2.50	200	37,500	22,500		£12,734,805	£849	£4,600,000	£307	£542
N4	Flats -	750		2.50	300	56,250	33,750		£18,180,792	£808	£4,600,000	£204	£604
	Mixed												
N5	Flats & 8,500 sq.m	500	10,000	3	200	47,500	22,500	10,000	£8,924,265	£564	£4,600,000	£291	£273
N6	Flats & 12,750 sq m	750	15,000	3	300	71,250	33,750	15,000	£12,982,666	£547	£4,600,000	£194	£353
	Central (2)												
C1	Houses -	10		0.10	100	920	552		£25,969,743	£2,823	£11,500,000	£1,250	£1,573
C2	Flats -	50		0.33	150	3,750	2,250		£19,072,527	£1,695	£9,200,000	£818	£878
C3	Flats -	500		2.50	200	37,500	22,500		£24,983,625	£1,666	£9,200,000	£613	£1,052
C4	Flats -	750		2.50	300	56,250	33,750		£42,084,525	£1,870	£9,200,000	£409	£1,462
	Mixed												
C5	Flats & 8,500 sq.m	500	10,000	3	200	47,500	22,500	10,000	£21,323,848	£1,347	£9,200,000	£581	£766
C6	Flats & 12,750 sq m	750	15,000	3	300	71,250	33,750	15,000	£30,948,603	£1,303	£9,200,000	£387	£916
	South (3)												
S1	Houses -	10		0.10	100	920	552		£40,546,340	£4,407	£23,000,000	£2,500	£1,907
S2	Flats -	50		0.33	150	3,750	2,250		£34,132,906	£3,034	£23,000,000	£2,044	£990
S3	Flats -	500		2.50	200	37,500	22,500		£44,744,039	£2,983	£23,000,000	£1,533	£1,450
S4	Flats -	750		2.50	300	56,250	33,750		£64,818,300	£2,881	£23,000,000	£1,022	£1,859
	Mixed												
S5	Flats & 8,500 sq.m	500	10,000	3	200	47,500	22,500	10,000	£36,932,885	£2,333	£23,000,000	£1,453	£880
S6	Flats & 12,750 sq m	750	15,000	3	300	71,250	33,750	15,000	£53,765,617	£2,264	£23,000,000	£968	£1,295

5.2.17 This is elaborated on further in Table 6.2 which summarises the proposed CIL charges as a % of GDV to demonstrate that CIL represents a relatively small proportion of overall value. All of the residential housing developments tested in the Borough are financially viable in the absence of CIL. Unsurprisingly viability is greater in the south zone than the north zone. However (as stated previously) proposed development, particularly in the White City Opportunity Area, is expected to have an overall upward effect on values in the north over time.

5.2.18 Although the analysis suggests that charges in a range of £273/m² - £1,907/m² may be capable of being sustained in the Borough, we strongly recommend that the charge be set beneath this viability ceiling. The principal reasons for this are that:

- Costs and values are likely to fluctuate over time and vary between different sites, which could make the charge unsustainable without a contingency margin (although it should be noted that the appraisals build-in a contingency margin of 5% of costs).
- Site-specific issues will adversely affect costs or values in some cases. In particular, some sites developments may involve significant abnormal costs which cannot be solely captured through a reduction in land value.
- Development appraisals of this nature invariably involve a margin of error.

5.2.19 The full viability assessments are shown in **Appendix C** . It is important to note that the residual land value referred to in the table above is termed the 'residualised price' in the detailed appraisal.

North Zone

5.2.20 As previously highlighted, the northern end of the Borough, which includes the areas around White City up towards Park Royal, does not experience such high land values as other parts of the Borough. We recommend a CIL charge of **£100/m²**.

Central Zone

5.2.21 In the Central charging zone, we recommend a CIL charge of **£200/m²**.

South Zone

5.2.22 It was considered whether a Riverside zone should be included which would pick up the higher values (identified in the market analysis) of development facing onto the river. However, it would be extremely difficult to define a riverside charging zone purely based on riverside views, particularly when values can notably vary from building to building and within buildings. Nevertheless, the higher values could lead to a more viable development than suggested by our appraisals.

5.2.23 In the area taking in Fulham (including South Fulham Riverside) and Parsons Green we recommend a CIL charge of **£400/m**

Other Regeneration Areas

5.2.24 The Regeneration Areas and their related market context, assumptions and potential CIL/S106 charges, including for residential use, are discussed in more detail in section 5.7.

5.3 Offices

Market Context & Assumptions

- 5.3.1 The office market in the Borough is largely focussed in and around Hammersmith Town Centre, leading from King Street to Hammersmith Road. Agents have recently reported²⁸ that office to residential conversion is putting pressure on office rents that had been improving due to the upturn in the economy.
- 5.3.2 Headline office rents for new space in Fulham are around £32.50 psf (£350 /m²) and £47.50psf (£511 /m²) in Hammersmith. With the tone for good quality refurbished space around £25psf (£270 /m²) – £28psf (£301/m²) in Fulham and £37.50psf (£403/m²) in Hammersmith.
- 5.3.3 Speculative office development has re-occurred in the Borough with phase 1 of Development Securities' 10 Hammersmith Grove completing in June 2013. We understand that Pernod Ricard has taken around 3,437 sq m (37,000 sq ft) of space here at a rent of £47 psf (£3,437/m²). Other deals around the town centre include pre-let at 184 Shepherds Bush Road for 115,000 sq ft (10,683m²) to Dunnhumby at £39.50psf (£425m²) and 44,175 sq ft (4,104 m²) of refurbished space at 161 Hammersmith Road which has been let to Virgin at £35psf (£377 m²).
- 5.3.4 Recent investment transactions include the sale of the 41,702 sq ft (3,874 sq m) 80 Hammersmith Road to Britannia Invest A/S for £20.65m, this reflected a net initial yield of 6.80%. We understand at the time of sale the property is let to five tenants at a combined annual rental income of £1.285m.
- 5.3.5 Hammersmith and the Opportunity Areas (White City and Earls Court and West Kensington) are the most likely locations for new build offices in the Borough as per the Core Strategy. New office development in South Fulham Riverside is unlikely unless part-subsidised as part of a mixed use project.

Potential Total CIL/S106 Contributions

Hammersmith Town Centre

²⁸ The Frost Meadowcroft Market Update 4th Quarter 2013

5.3.6 Based on available evidence we recommend a CIL charge of **£80 per m²** in Hammersmith Town Centre (as defined by the Core Strategy) and **£0 per m²** across the rest of the Borough for offices. A summary of the viability assessment is shown in Table 5-3:

Table 5.3 Potential CIL Charging Levels: Office, Summary of Viability Assessments – Hammersmith Town Centre

Ref	Zone	Commercial CIL Chargeable Floor Space sq.m		Residual value		Benchmark		Overage
		Ha	GIA Sq m	Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
HTC1	HTC offices	0.25	4,645	£23,920,183	£1,287	£14,000,000	£753	£534

5.3.7 Within Hammersmith Town Centre, potential overages of close to £534/m² clearly show that a CIL charge will not compromise viability. Our opinion is that a CIL charge of **£80/m²** is appropriate for offices in this area. This is well below the viability ceiling.

Outside Hammersmith Town Centre

5.3.8 Outside of Hammersmith Town Centre, potential overages are negative and thus **do not justify a CIL charge**. This is illustrated in Table 5.4:

Table 5.4 Office Viability Outside of Hammersmith Town Centre

Ref	Zone	Commercial CIL Chargeable Floor Space sq.m		Residual value		Benchmark		Overage
		Ha	GIA Sq m	Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
EXHTC1	ExHTC offices	0.25	4,645	£2,897,458	£156	£10,000,000	£538	-£382

5.3.9 The full viability assessments are shown in **Appendix C**

5.4 Industrial & Warehousing

Market Context & Assumptions

5.4.1 This type of employment space is under considerable pressure in Inner London, in particular from mixed use intensification. The pressure to intensify these sites with higher value uses such as residential and retail has led to a marked decline in the supply of industrial accommodation. As a consequence, very little new supply has been built in Hammersmith and Fulham in recent years with activity restricted to storage occupiers on sites to the north of the Borough. Our evidence is based on comparable evidence from existing stock towards Brent where new space (if any) is most likely to be brought forward.

Potential Total CIL/S106 Contributions

5.4.2 There has been little evidence of new-build industrial and warehousing space in Hammersmith and Fulham in recent years, with developers favouring more valuable uses. The greatest potential for new-build space will be in the northern part of the Borough. However evidence

on new build is scarce and we consider that industrial and warehousing uses cannot currently afford to bear a CIL charge and recommend a **£0/m2** charge. This is supported by the viability assessment below.

Table 5.5 Industrial and warehousing viability

Ref	Zone	Net site area	Commercial CIL Chargeable Floor Space sq.m	Residual value		Benchmark		Overage
				Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
BOR1ind	All industrial single	0.50	3,500	£2,924,325	£418	£3,000,000	£429	-\$11

5.4.3 The full viability assessment is shown in **Appendix C** .

5.5 Retail

Market Context & Assumptions

5.5.1 Retail provision in Hammersmith and Fulham is centred on the Westfield development, providing over 1.4 million square feet (130,000m²). It is one of the key retail destinations in inner London and competes with the West End, City and more recently Westfield Stratford City. Arguably there is also competition from the out of town centres such as Bluewater, Brent Cross and Lakeside. With such substantial competition, retail development and values are liable to change with the emergence of new destinations. Plans to expand Westfield with a further 600,000 sq ft (55,000m²) were granted outline planning permission in March 2012 and so will not be affected by the Borough CIL, instead being the subject of a separately negotiated S106 agreement.

5.5.2 The CIL charge assessments have therefore focussed on the wider retail provision in Hammersmith and Fulham looking at both the convenience and comparison goods sectors. We understand that the general tone of value across the Borough is not considerably varied. There are slightly increased values around the Fulham/ Kings Road area in Parsons Green and lower value at Earls Court. The latter of course is subject to an area-wide regeneration plan and the tone of the area will comprehensively change if the OAPF's proposals proceed. In our opinion charge variation is not justified within this sector based on geographical location.

5.5.3 Excluding Westfield, schemes coming forward are relatively small and largely convenience-related. We have analysed the sector based on readily available evidence and concluded that due to high land values in the central and southern zones, single storey retail is not financially viable and can only be brought forward as a mixed use project. This is because the increased site density of mixed use developments would create site values in line with current comparable evidence, so would be expected to proceed.

5.5.4 In the northern zone of Hammersmith and Fulham, site values are lower and arguably a retail-based scheme without a mixed use element could be viable.

Potential Total CIL/S106 Contributions

5.5.5 Excluding Westfield, Earls Court and White City, we do not see any significant single-use retail development being brought forward in the London Borough of Hammersmith and Fulham.

Small scale development of 1,000-2,000m² will form part of larger mixed use proposals which can support a CIL charge of **£80 per m²** for both convenience and comparison across the Borough with no variation by location or sector.

Comparison retailing

Table 5.6 Comparison Retail Viability

Ref	Zone	Net site area	Commercial CIL Chargeable Floor Space sq.m	Residual value		Benchmark		Overage
				Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
BOR2comp	All comparison retail	0.07	GIA Sq m 465	£12,802,616	£1,927	£10,000,000	£1,505	£422

Convenience retailing

Table 5.7 Convenience Retail Viability

Ref	Zone	Net site area	Commercial CIL Chargeable Floor Space sq.m	Residual value		Benchmark		Overage
				Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
BOR3conv	All convenience retail	0.07	GIA Sq m 465	£11,812,207	£1,778	£10,000,000	£1,505	£273

5.5.6 The full viability assessments are shown in **Appendix C**.

5.6 Other Uses

5.6.1 We have assessed the viability of the 'core' uses – residential, B-class commercial (office and industrial) and retail – in order to determine a 'standard level of charge' which will not undermine the delivery of these uses. A standard charge level will then apply to all types of development unless an alternative level of charge has been assessed and justified.

5.6.2 The standard charge has to be set at a level that all of the viable core uses can afford to pay with any uses which have been shown to be unviable having a £0/m². On the assessments shown earlier in this chapter, that level is **£80/m²** because Hammersmith Town Centre offices and retail uses can bear this level of charge. It is therefore recommended that the standard charge for all uses unless stated should be **£80/m²**.

5.6.3 As shown, the level of CIL charge proposed for residential uses is higher than the standard charge for all three zones proposed.

5.6.4 Whilst we have examined the core uses and their market context, certain other uses are considered to be worthy of exploring whether a particular level of charge can be justified (in addition to the Mayor's CIL, where relevant) and whether this is ultimately different from the standard charge of £80/m². Discussions with LBHF officers raised several uses which are considered to be important to the delivery of the Core Strategy.

Student Accommodation

- 5.6.5 The student accommodation market was resilient during the economic downturn and was seen as an attractive investment. The attractiveness of the sector was due to students wanting secure, good quality purpose built accommodation combined with the increase number of students attending university. This demand helped drive the need for accommodation, and in turn pushed up rents.
- 5.6.6 However, tuition fees increased in 2012 – 13 which resulted in a fall in applications by 6.7% on the previous year but recovered slightly (2.7%) for 2013-14.²⁹ But despite the fall in applications in the UK, demand from outside Europe has grown. The fall in student numbers led to rents in some areas of the country falling but due to the lack of supply in London rents here have remained firm.
- 5.6.7 The sector comprises three investment models, ranked in order of attractiveness; direct lease with the institution, nomination agreement with the institution and direct lets.

Table 5.8 Prime student accommodation yields in London

Location	Lease	Nomination Agreement	Direct Let
Prime London	4.75%	5.50%	6.10%

Source: Savills Spotlight: UK Student Housing Summer 2013

- 5.6.8 Imperial College London has two campuses located in the Hammersmith & Fulham Borough: Charing Cross Campus and Hammersmith Hospital Campus.
- 5.6.9 Rents for purpose built student accommodation in London vary between £150 and £275 per week depending on size, type and location. We are aware of the following weekly rents for purpose build schemes in the Borough and wider area:
- Pure Hammersmith's 418 bed scheme is offering a 17 sq m studio £265 per week on the site of the former Hammersmith Palais, Shepherds Bush Road.
 - Orient House, Station Court, Imperial Road London. A 15 sq m en-suite room in an 8 bed flat is £200 per week and a 26 sq m studio from £250 per week.
 - DIGS, Ravenscourt's single studios which range in size from 14.4 sq m to 15.2 sq m at a rent of £245 per week.
 - The Lyra, North Acton (in LB Ealing) 17 sq m studios are £219 per week and 20 sq m studios at £239 per week.
- 5.6.10 The rents stated above are inclusive and generally cover the cost of; building management, utilities, internet, contents insurance, use of a common room and concierge/security. Some rents cover additional services but that depends on the specific scheme. Typically these represent around 40% of the rental income.

²⁹ Savills Spotlight: UK Student Housing Summer 2013

- 5.6.11 The National Union of Students and Unipol report³⁰ that the average contract length in between 41 weeks to 45 weeks.
- 5.6.12 Based on the above market data we have assumed an average unit size of 18 sq m room at £240 per week over a 45 week period, delivered on a direct let basis. It could be argued that in London a longer contract is achievable because the accommodation can be used by part-time student or non-students during the summer holidays.
- 5.6.13 Average values are still lower than market value residential in most locations and therefore we are proposing that the standard charge of **£80/m²** is applied.

Table 5.9 Student Accommodation Viability

Ref	Zone	Net site area	Commercial CIL Chargeable Floor Space sq.m	Residual value		Benchmark		Overage
				Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
BOR5stu	Student accommodation (250 bed)	0.30	7,000	£19,695,962	£844	£14,000,000	£600	£244

- 5.6.14 The full viability assessments are shown in **Appendix C** .

Leisure

- 5.6.15 Following discussions with officers, it was felt appropriate to explore the potential for a CIL charge for health and fitness leisure uses. This was not extended to the other uses within the D2 use class – including cinemas, music venues, bingo halls, swimming baths, skating rinks, etc – because such uses are, of themselves, very specialist. When aggregated together as single use class they total a significant amount of floorspace yet each represents a ‘one off’ type of development and would require its own viability assessment. This it was felt would add an unnecessary layer of complexity to the CIL charging schedule so have been treated together in the viability testing.
- 5.6.16 Knight Frank report³¹ that the leisure occupational market continues to go from strength to strength. Major cinema chains such as VUE, Cineworld and Odeon are continually seeking to expand, and often in competition for attractive sites. The health and fitness sector expansion is shifting towards the value end with likes of Pure Gym, Easy Gym and Gym Group actively looking for new sites.
- 5.6.17 There has been quite a bit of investment activity in the leisure sector. Particularly attractive are strong covenants secure on long leases of up to 25 years with fixed increases at review. We are aware of the following transactions:
- January 2014, Harmsworth Pooled Property Unit Trust bought the Odeon in Leicester Square for £17.9m, reflecting a net initial yield of 6.97%. Lease included annual rent reviews geared to RPI.
 - January 2014, AXA Real Estate acquired the Odeon in Swiss Cottage for £4.78m reflecting a 7.13% initial yield. Lease included annual rent reviews geared to RPI.

³⁰ The National Union of Students and Unipol *Accommodation Costs Survey 2012/13*

³¹ Knight Frank *Out-of-town & Leisure Occupational & investment markets Summer 2013*

- July 2013, Virgin Active investment in Wandsworth on open market reviews sold for £9.42m reflecting a 6.13% yield.
- Virgin Active Health Club in Notting Hill sold for £11.5m, reflecting a net initial yield of 5.675%. The property was a former school building, which has been adapted to provide health and fitness space totalling 33,895 sq ft (3,150 sq m). The property is let to Holmes Place Health Clubs Limited with a parent guarantee from Virgin Active for a further 21 years.

5.6.18 Our viability testing suggests that leisure uses are currently viable and we are recommending they should simply pay the 'standard' charge, i.e. **£80/m2**.

Table 5.10 Leisure Viability

Ref	Zone	Net site area	Commercial CIL Chargeable Floor Space sq.m	Residual value		Benchmark		Overage
				Per Ha	Per £psm	Per Ha	Per £psm	Per £psm
BOR6leis	Leisure use	0.15	2,000	£6,970,681	£523	£5,000,000	£375	£148

5.6.19 The full viability assessments are shown in **Appendix C** .

Hotels

5.6.20 We have, taking into account recent hotel developments in the Borough, made the following headline assumptions with regards to undertaking a high level hotel CIL viability appraisal. A full list of assumptions is set out in **Appendix A** .

- We have assumed a 3-star, 100 bed hotel
- We have assumed a room value of £6,500 per annum. We have used a yield of 6% based on hotel market research information publicly available.
- We have used build costs of £50,000 per room based on comparable evidence for build costs for 3-star budget hotel rooms.

5.6.21 Our viability testing suggests that hotel uses are not currently viable and we are recommending a **£0/m2** CIL charge but should be assessed for S106 on a case by case basis.

Education & Health

5.6.22 Education and health, for the purpose of assessing the potential to support a CIL charge, are defined in exactly the same way as in the London Mayor's CIL charging schedule:

- **Health** – 'Development used wholly or mainly for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner';
- **Education** – 'Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education.'

- 5.6.23 Whilst there are a number of private schools in the Borough, the growth in the Borough is to be supported by changes in the provision in capacity of state schools. Officers have confirmed that it is not possible to deliver new capital build education projects without funding support. As such, development of facilities for state education cannot sustain a charge and we recommend a **£0/m²** charge.
- 5.6.24 It is considered that the same principle applies to health provision, being the other key institutional development type that is expected to come forward over the plan period.
- 5.6.25 This evidence is consistent with that used to inform the Mayor's CIL charge. The Charging Schedule has a nil charge for health and education sectors because of the pressures on constrained public resources and their likely effect on viability decisions by the relevant authorities.
- 5.6.26 It is therefore proposed that, in respect of all education and health development, a nil charge is levied, i.e. **£0/m²**.

Sui Generis Uses

- 5.6.27 Sui generis uses include theatres; houses in multiple occupation; hostels providing no significant element of care; scrap yards; petrol filling stations; shops selling and/or displaying motor vehicles; retail warehouse clubs; nightclubs; launderettes; taxi businesses; amusement centres; and casinos. The types of premises, value of uses and development costs for premises accommodating these types of activity will vary considerably; and this means that sui generis uses cannot be treated in the same way as the other use classes.
- 5.6.28 By their very nature, sui generis uses cover a very wide range of development types, so it is prudent to consider a cross section of such uses.
- 5.6.29 Our approach to this issue has been to consider the types of premises and locations that may be used for sui generis and assess whether the costs and value implications may have similarities with other uses. We have also considered the likely developments within the plan period as a guide to whether more detailed work might be useful. A charge of **£80/m²** is recommended for such uses (with some exceptions below).
- **Theatres** – very few new theatres are being developed in the UK and the exceptions – such as Chester – are in locations with large catchments, an existing foundation of extensive artistic activity and a local authority with the means and inclination to pay. We do not consider it likely that a new theatre will be developed in Hammersmith & Fulham during the plan period and officers have confirmed that there are no aspirations for this to be publicly provided. The Lyric Theatre has been granted planning permission for an extension of the theatre and studio space, along with office development but unless this is not implemented and a new application submitted, would not be liable for CIL in any event.
 - **Hostels** - providing no significant element of care – these are likely to be either charitable or public sector uses such as probation hostels, half-way houses, refuges etc., or low cost visitor accommodation such as youth hostels. Our view is that the charitable uses are dependent upon public subsidy for development and operation, and therefore not viable in any commercial sense. Youth Hostels are operated on a social enterprise basis with small financial returns. We understand the delivery of such hostels is not absolutely necessary for the delivery of the Core Strategy and in any case, such hostels may utilise existing floorspace and many are charitable institutions potentially benefitting from relief from CIL. Therefore, no separate charge to the standard charge is recommended.
 - **Scrapyards** – it is unlikely that there would be new scrapyard/recycling uses in the Borough in the future, even given the potential for the price of metals and other materials

to rise. They are unlikely because of the comparatively low value compared to existing uses in the Borough. A further consideration is that these uses are likely to occupy the same sorts of premises as many B2 uses and therefore the viability will be covered by the assessment of the viability of B2 uses for which we have recommended a **£0/m2** charge.

- **Petrol filling stations** – we are aware that recent new filling stations have generally been as part of larger supermarket developments, with independent filling stations closing. It seems unlikely that here will be significant new stand-alone filling station development in the Borough.
- **Selling and/or displaying motor vehicles** - sales of vehicles are likely to occupy the same sorts of premises and locations as many B2 uses and therefore the viability will be covered by the assessment of the viability of B2 uses for which we have recommended a **£0/m2** charge.
- **Retail warehouse clubs** – these retail uses are likely to be in the same type of premises as the out of town A1 retail uses and covering the same purchase or rental costs. Therefore they are covered by this viability assessment.
- **Nightclubs** – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs. Therefore they are covered by this viability assessment.
- **Launderettes** – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs. Therefore they are covered by this viability assessment.
- **Taxi businesses** – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs. Therefore they are covered by this viability assessment.
- **Amusement centres** – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs. Therefore they are covered by this viability assessment.
- **Casinos** – There is no national policy determining the location of major casinos and we are not aware of any such proposals for the Borough.

5.7 White City, Earls Court and South Fulham Riverside

- 5.7.1 As set out in section 3, most of the development necessary to deliver the Core Strategy's vision is planned to take place in the regeneration areas. Further detailed viability evidence in the form of SPDs and Development Infrastructure Funding Studies (DIFS) is available for each of the White City, Earls Court and South Fulham Riverside areas, and this report has taken into account that evidence for such 'strategic sites' as set out below.

White City

- 5.7.2 The White City Development Infrastructure Funding Study (DIFS)³² provides an infrastructure planning and viability evidence base to support the Local Plan and SPD in the delivery of the opportunity area and, particularly, the White City East strategic site.

³² AECOM & Drivers Jonas Deloitte (2012 & 2013) *White City Development Infrastructure Funding Study (Original & Final Reports)*

- 5.7.3 PBA's White City appraisals have largely used the same assumptions as the DIFS. PBA has considered the DIFS assumptions and made adjustments where appropriate as shown in Appendix A.
- 5.7.4 PBA's testing of White City East viability has considered four scenarios of potential development. It is anticipated that most development will come forward in large sites:
1. 100 unit flatted scheme on 0.33 hectare site;
 2. 100 unit flatted scheme on a 0.5 hectare site;
 3. 3 hectare mixed used scheme of 500 flats and of 10,000 sq m mixed commercial; and
 4. 3 hectare mixed used scheme of 750 flats and 15,000 sq m mixed commercial.
- 5.7.5 Our viability testing suggests that development at White City East is viable with the resulting overages ranging from £223 to £680 psm which would be able to bear the standard charge of **£80 per m²** across all uses.

Table 5.11 White City Development Viability

Ref	White City	Dwellings	Commercial	Net site area	Density	Total Floor	Residential CIL	Commercial	Residual land value with policy contributions	Benchmark		Overage	
		No.	sq.m (GIA)	ha		Space sq.m	Chargeable Floor Space sq.m	CIL Chargeable Floor Space sq.m		Per Ha	Per £psm	Per Ha	Per £psm
WC1	100 flats low density	100		0.50	300	7,500	4,500		£19,538,179	£1,303	£14,000,000	£933	£369
WC2	100 flats high density	100		0.33	200	7,500	4,500		£29,307,269	£1,303	£14,000,000	£622	£680
WC3	500 Flats & 10,000 sq m	500	10,000	3	200	47,500	22,500	10,000	£17,525,362	£1,107	£14,000,000	£884	£223
WC4	750 Flats & 15,000 sq m	750	15,000	3	300	71,250	33,750	15,000	£25,223,761	£1,062	£14,000,000	£589	£473

- 5.7.6 However, it should be noted that there is substantial infrastructure which is required to support White City East, as identified in the WCOAPF SPD and the DIFS. We understand that, as recommended in the DIFS, the council is considering a policy approach to seek S106 obligations for some or all of the necessary infrastructure which will remain to be delivered once CIL is in place. We understand the policy will be set in light of the extent of existing S106s already agreed in the area and the need to ensure that suitable mechanisms are used to deliver such infrastructure.
- 5.7.7 If the council decides to set a policy that infrastructure in White City East should continue to be sought through S106s, the viability implications of this for CIL charge-setting purposes needs to be considered.
- 5.7.8 The DIFS estimated that development in White City East might amount to some 710,000 sq.m and that total infrastructure costs were of the order of £113M of which some £57M was regarded as essential. Based on these figures the implications of the proposed S106 policy approach would be a development contribution to these costs via S106 averaging between £80 to £159/sq.m.on all floorspace (though the appropriate contribution for any particular development would be dependent on a variety of factors).
- 5.7.9 The proposed policy approach will need to be considered under the requirements of paragraph 153 of the NPPF and the Town & Country Planning (Local Planning (England) Regulations 2012 (including relevant consultation). It must be clear that the provided infrastructure is clearly required to implement the plan policies.
- 5.7.10 If the Council were to introduce a policy approach leading to S106 contributions of this sort of order the potential overages would be significantly reduced and development at White City East would not be able to bear a CIL charge. In that case we would recommend a charge of **£0 per m²** across all uses within the zone shown on the map at Figure 5.4.

Earls Court

- 5.7.11 The Earls Court DVS Viability Summary³³ provides a viability evidence base to support the SPD in the delivery of the opportunity area. The DVS report's purpose was to appraise the development scenarios considered in preparing the Earls Court and West Kensington Opportunity Area SPD (part of which lies within the Royal Borough of Kensington & Chelsea).
- 5.7.12 PBA's Earls Court appraisals have largely used the same assumptions as the DVS report. PBA has considered the DVS assumptions and agree that they are an appropriate basis for viability modelling, however, differences between the PBA and DVS approach include:
- Some figures are not a direct translation due to the different way in which the DVS and PBA models work, for example marketing / agents / legal costs. PBA has made appropriate alternative assumptions based on professional judgement.
 - PBA has modelled phasing based on the DVS sales rates and development period and made a reasonable judgement on phasing of infrastructure costs using an S-curve.
- 5.7.13 S106 costs for social infrastructure have been excluded from the PBA approach in order that the PBA appraisals as a whole are consistent. However, PBA has adopted DVS's estimate of infrastructure and abnormal costs which includes items of physical infrastructure that may be included within S106 obligations., A planning application has been approved on the Earls Court main site and at Seagrave Road and a S106 Agreement has been signed in both cases. Due to the size and complex nature of the proposed development it is possible that elements of the scheme may require new planning applications during the course of the plan period. To reflect potential development at Earls Court as per scenario 3 of the DVS report, we have tested a 32.60 hectare mixed used scheme of 8,000 flats and 267,787 sq m mixed commercial.
- 5.7.14 The viability analysis shows that the overage is negligible. In addition, we understand that development would be expected to contribute towards substantial site specific infrastructure costs (as has been the case with development for most of the area that has already been approved). Accordingly, a CIL charge for the SPD area could not be justified on viability grounds and it is recommended that a **£0/m²** CIL charge is applied. Policy and infrastructure contributions from further development in the area can continue to be captured through S106 obligations justified in accordance with the legal tests and subject to the viability of individual schemes.

Table 5.12 Earls Court Development Viability

Ref	Earls Court	Dwellings	Commercial sq.m (GIA)	Net site area	Total Floor Space sq.m	Development density	Residential CIL Chargeable Floor Space sq.m	Commercial CIL Chargeable Floor Space sq.m	Residual land value with policy contributions		Benchmark		Overage
		No.	ha	Floor Space	per sq m	Floor Space	Per Ha	Per £psm	Per Ha	Per £psm	Per £psm		
ECWK	8,000 Flats & 267,787 sq m (32.60 ha)	8000	267,787	32.6	955,787	29,319	405,920	267,787	£15,302,860	£522	£15,000,000	£512	£10

- 5.7.15 It should be noted that the appraisal on which the overage figures in Table 5.12 are based does not include any assumptions for social infrastructure S106s. If known S106 costs from either the DVS report or from known planning applications were factored in, this would clearly result in an even lower overage (likely to become negative), for the purposes of this CIL viability modelling exercise. The DVS report also notes that there are other land and overall scheme related costs. These would also reduce the overage shown in our table to make it negative.

³³ DVS (2011) *Earls Court and West Kensington Opportunity Area Joint Supplementary Planning Document: Viability Summary*

South Fulham Riverside

- 5.7.16 The South Fulham Riverside Delivery and Infrastructure Funding Study (DIFS)³⁴ provides an infrastructure planning and viability evidence base to support the SPD in the delivery of the regeneration area.
- 5.7.17 The South Fulham Riverside area is a location with potential for further high density apartment developments with high sales values – especially those with riverside views. Based on our own viability work and the DIFS, it is considered that the proposed residential charge for the South Zone was appropriate for South Fulham Riverside. Therefore the area is included as part of the South Zone for the purposes of CIL charging.

³⁴ CgMs and Cushman & Wakefield (2013) *South Fulham Riverside SPD Delivery and Infrastructure Funding Study*

6 RECOMMENDED CIL CHARGES

6.1 Recommending a CIL Charge

- 6.1.1 The summary tables indicate that CIL charges of a given amount may be capable of being sustained in an area. However we recommend that the charge is set well below this point. The principal reasons for this are that:
- i. Markets fluctuate over time. There must be sufficient latitude for fluctuations to happen without rendering the CIL charge unviable.
 - ii. Individual site costs and values vary. Developments should remain viable after CIL charge is paid in the bulk of cases.
- 6.1.2 It is conceivable that a simple, arithmetical approach could be used to take us from the 'overage' (that the summary table suggests is available for CIL and/or S106) to a recommended CIL Charge. For example it would be possible to set a CIL at, perhaps between 50-70% (a range of %s could be appropriate) of the overage indicated in the viability testing, and to mechanically apply this deflator.
- 6.1.3 We have intentionally avoided this approach however because the viability tests necessarily cannot take account of developers' market understanding of risk, or of institutional investors' willingness to invest. These are important components of the judgement as to a sensible level of CIL charge, but ones which do not emerge arithmetically from the viability model. Instead, we use our market judgement in arriving at a sensible charge.
- 6.1.4 We would also note that the actual £/m² charge for residential development would equate to less than the CIL charge apportioned across the whole development because social housing will be exempt.

6.2 The Recommended CIL Charge

- 6.2.1 We have assessed the potential for a CIL charge in Hammersmith and Fulham and consider that the following charges are appropriate. This is because they do not undermine the viability of the bulk of development that is expected to deliver the Core Strategy:

Table 6.1 Recommended CIL Charges

Use	South Charging Zone	Central Charging Zone		North Charging Zone
		Within Hammersmith Town Centre	Outside Hammersmith Town Centre	
Charge for all uses unless otherwise stated	£80/m ²			
Residential	£400/m ²	£200/m ²		£100/m ²
Office (B1a/b)	£0/m ²	£80/m ²	£0/m ²	£0/m ²
Industrial (B1c/B2) and warehousing (B8) uses	£0/m ²			
Hotels	£0/m ²			
Health and Education uses*	£0/m ²			
White City East**	£80/m ² or £0/m ²			
Earls Court and West Kensington Opportunity Area	£0/m ²			

*Education and health are as defined in the Mayor's CIL Charging Schedule:

- **Health** – 'Development used wholly or mainly for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner'
- **Education** – 'Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education'

**See section 5.7

6.2.2 These charges exclude the charges that development in the Borough will have to pay towards the Mayor's Crossrail CIL (an additional £50/m²). However the viability of the charges proposed reflect the need to pay this charge because it has been factored into the appraisals.

6.2.3 We would also note again that the overage shown by the appraisals represents potential for both CIL and S106, and that whilst we have allowed for a de minimis S106 contribution within the appraisals (£1,000 per dwelling for residential schemes) some of the remaining overage could potentially be either CIL or S106 or a combination of the two.

6.2.4 We have set out in Table 6.2 the percentage of the cost of the proposed CIL charges for each area when compared to Gross Development Value for illustrative purposes. The table shows that, whilst CIL is a cost of development, in terms of a comprehensive development viability appraisal it equates to a nominal amount when compared to Gross Development Value and the 'cost' of additional requirements such as affordable housing, contingencies, build costs etc. Previous CIL Examinations have indicated that a CIL charge of between 1% and 4% of GDV are likely to be appropriate.

Table 6.2 CIL Charge by Area & Scheme as a Percentage of GDV

Proposed CIL	Standard commercial charge	Scheme	GDV	Residential chargeable floorspace	Commercial floorspace	CIL	CIL as % of GDV
£100	£80	N1	£3,705,760	552		£55,200	1.5%
£100	£80	N2	£14,780,438	2,250		£225,000	1.5%
£100	£80	N3	£147,804,375	22,500		£2,250,000	1.5%
£100	£80	N4	£221,706,563	33,750		£3,375,000	1.5%
£100	£80	N5	£166,694,175	22500	10000	£3,050,000	1.8%
£100	£80	N6	£252,282,675	33750	15000	£4,575,000	1.8%
£200	£80	C1	£5,187,328	552		£110,400	2.1%
£200	£80	C2	£18,976,463	2,250		£450,000	2.4%
£200	£80	C3	£189,764,625	22,500		£4,500,000	2.4%
£200	£80	C4	£284,646,938	33,750		£6,750,000	2.4%
£200	£80	C5	£218,075,840	22500	10000	£5,300,000	2.4%
£200	£80	C6	£327,113,760	33750	15000	£7,950,000	2.4%
£400	£80	S1	£7,160,544	552		£220,800	3.1%
£400	£80	S2	£25,746,075	2,250		£900,000	3.5%
£400	£80	S3	£257,460,750	22,500		£9,000,000	3.5%
£400	£80	S4	£386,191,125	33,750		£13,500,000	3.5%
£400	£80	S5	£282,374,619	22500	10000	£9,800,000	3.5%
£400	£80	S6	£423,561,929	33750	15000	£14,700,000	3.5%

Note: In this table commercial CIL has been assumed to be levied on all commercial floorspace. In practice, some commercial floorspace (e.g. offices other than in Hammersmith Town Centre) may not be liable to pay the charge.

Table 6.3 Charge by commercial uses as a Percentage of GDV

Proposed CIL	Scheme	GDV	Commercial floorspace	CIL	CIL as % of GDV
£80	HTC Offices	£21,507,156	4,645	£371,600	1.7%
£80	Comparison retail	£1,981,682	465	£37,200	1.9%
£80	Convenience retail	£2,130,788	465	£37,200	1.7%
£80	Student accommodation	£25,495,082	7,000	£560,000	2.2%
£80	Leisure	£6,259,657	2,000	£160,000	2.6%

Appendix A Development Appraisal Assumptions

North, Central & Southern Area Appraisals:

Assumption	Source	Notes															
Construction Costs																	
	BCIS Online - Rebased for LB Hammersmith & Fulham - November 2013	<p>Residential build costs are based upon industry data from the Build Cost Information Service (BCIS) which is produced by the Royal Institution of Chartered Surveyors (RICS). BCIS offers a range of prices dependent on the final specification.</p> <p>The following build costs used are derived from recent data of actual prices in the marketplace. For flats we have used upper quartile rates for 6+ storey development. For houses we have also used upper quartile rates. As early as 2009, the market across the UK was building at round Code for Sustainable Homes Level 3 to 4 for private and Level 4 for affordable housing. Depending on actual scheme specification costs could greatly vary from the BCIS data. However, the costs are based on a 'typical residential development' in the area with no specific consideration of scheme features which may result in a 'premium' product and could follow through into enhanced sale values.</p> <p>Private</p> <table> <tr> <td>Flats –</td> <td>£1,801</td> <td>sq m</td> </tr> <tr> <td>Houses -</td> <td>£1,187</td> <td>sq m</td> </tr> </table> <p>Affordable</p> <table> <tr> <td>Flats –</td> <td>£1,801</td> <td>sq m</td> </tr> <tr> <td>Houses –</td> <td>£1,187</td> <td>sq m</td> </tr> </table> <p>Costs may alter in future. In particular, there may be national policy change regarding Code for Sustainable Homes building standards. The final effect of these changes on viability is difficult to foresee. While we have reviewed current Government research on cost impacts of CSH we note that past forecasts of price changes (such as that predicted in the original Cyril Sweet work) have never affected costs to the extent forecast. When these future requirements come into force, they will impact on both development costs and land values. We have not incorporated these possible impacts into our calculations, because CIL should deal with current market conditions, not forecasts of potential future change. Our approach to incorporating these (and other) potential but unknown costs is to set a wide margin for error that will cover variations in factors such as build costs, site conditions, and timing.</p> <p>Commercial</p> <table> <tr> <td>Mixed commercial</td> <td>£1,559</td> <td>sq m</td> </tr> </table> <p>The majority of commercial space is to comprise offices. As such we have used median build costs for air-conditioned offices. In reality, dependent upon the mix of uses, build costs may vary from this figure.</p>	Flats –	£1,801	sq m	Houses -	£1,187	sq m	Flats –	£1,801	sq m	Houses –	£1,187	sq m	Mixed commercial	£1,559	sq m
Flats –	£1,801	sq m															
Houses -	£1,187	sq m															
Flats –	£1,801	sq m															
Houses –	£1,187	sq m															
Mixed commercial	£1,559	sq m															

Plot external	Stakeholder consultation & industry standards	Site preparation and infrastructure has been either calculated as a percentage of build costs or a rate per hectare as follows: 5% of build costs																								
Professional Fees	Industry standards	Professional fees relate to the costs incurred to bring the development forward and cover items such as; surveys, architects, quantity surveyor etc. Professional fees are based upon accepted industry standards and are calculated as a percentage of build and external costs at: 10%																								
Contingency	Industry standards	Contingency is based upon the risk associated with each site and has been calculated as a percentage of build and external costs at 5%																								
Sale costs	Industry standards	<p>Sale costs relate to the costs incurred to dispose the completed residential units. These rates are based on industry accepted scales at the following rates:</p> <p>Residential</p> <table> <tr> <td>Sale agents fee</td> <td>1.25%</td> <td>Gross Development Value of private units</td> </tr> <tr> <td>Sale legal fee</td> <td>£500</td> <td>per unit</td> </tr> <tr> <td>Marketing</td> <td>£1,000</td> <td>per private unit</td> </tr> </table> <p>Commercial</p> <table> <tr> <td>Sale agents fee</td> <td>1.25%</td> <td>Gross Development Value</td> </tr> <tr> <td>Sale legal fee</td> <td>1.25%</td> <td>Gross Development Value</td> </tr> <tr> <td>Letting agent fee</td> <td>10%</td> <td>First year rent</td> </tr> <tr> <td>Letting legal fee</td> <td>5.00%</td> <td>First year rent</td> </tr> <tr> <td>Marketing</td> <td>4%</td> <td>Gross first year rent</td> </tr> </table>	Sale agents fee	1.25%	Gross Development Value of private units	Sale legal fee	£500	per unit	Marketing	£1,000	per private unit	Sale agents fee	1.25%	Gross Development Value	Sale legal fee	1.25%	Gross Development Value	Letting agent fee	10%	First year rent	Letting legal fee	5.00%	First year rent	Marketing	4%	Gross first year rent
Sale agents fee	1.25%	Gross Development Value of private units																								
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Letting agent fee	10%	First year rent																								
Letting legal fee	5.00%	First year rent																								
Marketing	4%	Gross first year rent																								
Finance costs	Industry standards	When testing for development viability it is common practice to assume development is 100% debt financed (Viability Testing Local Plans - Advice for planning practitioners and RICS Financial viability in planning guidance note GN94/2012. Within our cashflow we used a finance rate based upon market rates of interest as follows: 7%																								
Stamp Duty on Land Purchase	HMRC	<p>Stamp Duty Land Tax (SDLT) is generally payable on the purchase or transfer of property or land in the UK where the amount paid is above a certain threshold. The SDLT rates are by Treasury, the following rates current rates have been applied:</p> <table> <tr> <td>up to £125,000</td> <td>0.00%</td> </tr> <tr> <td>Over £125,000 to £250,000</td> <td>1.00%</td> </tr> <tr> <td>Over £250,000 to £500,000</td> <td>3.00%</td> </tr> <tr> <td>Over £500,000</td> <td>4.00%</td> </tr> </table>	up to £125,000	0.00%	Over £125,000 to £250,000	1.00%	Over £250,000 to £500,000	3.00%	Over £500,000	4.00%																
up to £125,000	0.00%																									
Over £125,000 to £250,000	1.00%																									
Over £250,000 to £500,000	3.00%																									
Over £500,000	4.00%																									

Professional fees on Land Purchase	Industry standards	In addition to SDLT the purchaser of land will incur professional fees relating to the purchase. Fees associated with the land purchase are based upon the following industry standards: Surveyor - 1.00% Legals - £25,000																																																																																
Profit																																																																																		
Developer's return	Stakeholder consultation & industry standards	A developer's return is based upon their attitude to risk. A developer's attitude to risk will depend on many factors that include but not exclusive to, development type (e.g. Greenfield, Brownfield, refurbishment, new build etc), development proposal (uses, mix and quantum), credit worthiness of developer, and current market conditions. We have applied profit at the following percentage of build costs: Developer return 20% on total development costs																																																																																
Time-scales																																																																																		
Build rate units/per annum	Stakeholder consultation	House builders typically build to sell. Therefore build rates are determined by market conditions of how many units can be sold on a monthly basis as developers do not want to be holding onto stock as this impacts their cashflow. It has been assumed that the affordable units will be sold during each phase and do not form part of any pre-sales. This is a conservative approach as in reality bulk sales of affordable housing may occur. <table border="1"> <thead> <tr> <th colspan="2">Construction period</th> <th>Start</th> <th>Finish</th> <th>Length in months</th> </tr> </thead> <tbody> <tr> <td>Houses –</td> <td>10</td> <td>01 April 13</td> <td>31 Dec 13</td> <td>9</td> </tr> <tr> <td>Flats -</td> <td>50</td> <td>01 April 13</td> <td>31 Dec 13</td> <td>9</td> </tr> <tr> <td>Flats -</td> <td>500</td> <td>01 April 13</td> <td>30 Sept14</td> <td>18</td> </tr> <tr> <td>Flats -</td> <td>750</td> <td>01 April 13</td> <td>30 June15</td> <td>27</td> </tr> <tr> <td>Flats -</td> <td>500</td> <td>01 April 13</td> <td>30 Sept14</td> <td>18</td> </tr> <tr> <td>Mixed commercial unit</td> <td>8,500</td> <td>01 April 13</td> <td>30 Sept14</td> <td>18</td> </tr> <tr> <td>Flats -</td> <td>750</td> <td>01 April 13</td> <td>30 June 2015</td> <td>27</td> </tr> <tr> <td>Mixed commercial unit</td> <td>12,750</td> <td>01 April 13</td> <td>30 June 2015</td> <td>27</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="2">Sales period</th> <th>Start</th> <th>Finish</th> <th>Length in months</th> </tr> </thead> <tbody> <tr> <td>Houses –</td> <td>10</td> <td>01 Jan 14</td> <td>31 May 2014</td> <td>5</td> </tr> <tr> <td>Flats -</td> <td>50</td> <td>01 Jan 14</td> <td>31 March 2014</td> <td>3</td> </tr> <tr> <td>Flats 500</td> <td>Phase 1 pre sales</td> <td>01 Jan 14</td> <td>30 January 14</td> <td>1</td> </tr> <tr> <td></td> <td>Phase 1</td> <td>01 Feb 14</td> <td>01 July 14</td> <td>6</td> </tr> <tr> <td></td> <td>Phase 2 pre sales</td> <td>01 Oct14</td> <td>30 Oct 14</td> <td>1</td> </tr> <tr> <td></td> <td>Phase 2</td> <td>01 Nov14</td> <td>01 April 15</td> <td>6</td> </tr> </tbody> </table>	Construction period		Start	Finish	Length in months	Houses –	10	01 April 13	31 Dec 13	9	Flats -	50	01 April 13	31 Dec 13	9	Flats -	500	01 April 13	30 Sept14	18	Flats -	750	01 April 13	30 June15	27	Flats -	500	01 April 13	30 Sept14	18	Mixed commercial unit	8,500	01 April 13	30 Sept14	18	Flats -	750	01 April 13	30 June 2015	27	Mixed commercial unit	12,750	01 April 13	30 June 2015	27	Sales period		Start	Finish	Length in months	Houses –	10	01 Jan 14	31 May 2014	5	Flats -	50	01 Jan 14	31 March 2014	3	Flats 500	Phase 1 pre sales	01 Jan 14	30 January 14	1		Phase 1	01 Feb 14	01 July 14	6		Phase 2 pre sales	01 Oct14	30 Oct 14	1		Phase 2	01 Nov14	01 April 15	6
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		Phase 2 pre sales	01 April15	30 April 15	1	
		Phase 2	01 May15	01 Jan 16	9	
	<hr/>					
	Mixed commercial 10,000 sq m GIA					
		Flats - Mixed commercial				
		Phase 1 (NIA)	4,250	01 Jan 14	30 Jan 14	1
		Mixed commercial				
		Phase 2 (NIA)	4,250	01 Oct 14	30 Oct 14	1
<hr/>						
Mixed commercial 15,000 sq m GIA						
	Mixed commercial					
	Phase 1 (NIA)	6,375	01 May 14	30 May 14	1	
	Mixed commercial					
	Phase 2 (NIA)	6,375	01 April15	30 April 15	1	

Benchmark land value per ha						
Residential land values	Stakeholder consultation	<p>Our estimates of benchmark land values are based on market comparables. Actual site values will vary to reflect the landowner's judgement and the extent to which the landowner takes account of the contextual nature of development, the site density achievable, the approach to the delivery of affordable housing (in the context of residential development), abnormal or site specific costs and expected S106 requirements and so on. It should also be noted that land values should ultimately be reduced to take account of CIL as suggested in the examiner's report into the Mayor of London's CIL³⁵. There are a wide range of permutations here. In order to make progress, we have to assume a central benchmark value, even though there could be a margin of error in practice.</p> <p>In establishing the benchmark land values we have examined a variety of land transactions in Hammersmith & Fulham using the following main sources:</p> <p>*Land currently being marketed on the UK Land Directory website. *Consultations with local property agents and developers.</p> <p>In some instances, the actual comparables we have used were provided in confidence and cannot be made public.</p> <p>These comparables generally relate to urban, brownfield sites, which were fully serviced with roads and major utilities to the site boundary. In collecting evidence on residential land values, we aimed to distinguish between sites that deliver flats and housing sites - this is due to development densities.</p> <p>Historically we would expect that land values for smaller sites would be higher, because the offsite contribution policy. In this assessment we have assumed that a new policy is in place and will remove the disparity in land values. This approach is in line with the Harman report which advises authorities to work on the basis of future policy and its effects on land values.</p>				
			Southern	Central	Northern	
		Houses - 10	£5,700,000	£11,500,000	£23,000,000	per ha
		Flats - 50	£4,600,000	£9,200,000	£23,000,000	per ha
		Flats - 500	£4,600,000	£9,200,000	£23,000,000	per ha
Flats - 750	£4,600,000	£9,200,000	£23,000,000	per ha		

³⁵ The Planning Inspectorate (2012) *Report on the Examination of the Draft Mayoral Community Infrastructure Levy Charging Schedule*

		<p>Mixed - 500 resi & 8,500 sq m commercial £4,600,000 £9,200,000 £23,000,000 per ha</p> <p>Mixed - 750 resi & 12,750 sq m commercial £4,600,000 £9,200,000 £23,000,000 per ha</p>																								
Revenue																										
Sales value of completed scheme	Land Registry, and consultation	<p>Property Values updated as per industry advice / land registry evidence December 2013 Property values are derived from different sources, depending on land use. For housing, Land Registry data forms a basis for analysis. This provides a full record of all individual transactions. This data is then supplemented following conversations with agents and house builders' sales representatives, which allows us to form a view on new build sales values. Values used are as follows:</p> <p>North</p> <table> <tr> <td>Private sale values</td> <td>Flats –</td> <td>£5,985</td> <td>sq m</td> </tr> <tr> <td>Private sale values</td> <td>Houses –</td> <td>£4,970</td> <td>sq m</td> </tr> </table> <p>Central</p> <table> <tr> <td>Private sale values</td> <td>Flats –</td> <td>£8,025</td> <td>sq m</td> </tr> <tr> <td>Private sale values</td> <td>Houses –</td> <td>£7,500</td> <td>sq m</td> </tr> </table> <p>South</p> <table> <tr> <td>Private sale values</td> <td>Flats –</td> <td>£11,385</td> <td>sq m</td> </tr> <tr> <td>Private sale values</td> <td>Houses –</td> <td>£10,895</td> <td>sq m</td> </tr> </table>	Private sale values	Flats –	£5,985	sq m	Private sale values	Houses –	£4,970	sq m	Private sale values	Flats –	£8,025	sq m	Private sale values	Houses –	£7,500	sq m	Private sale values	Flats –	£11,385	sq m	Private sale values	Houses –	£10,895	sq m
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Affordable housing (Section 106)	Developer consultation	<p>Following consultation with house builders we have assumed a blended average of intermediate and affordable rented accommodation in line with current policy as follows:</p> <p>Affordable rent</p> <p>North</p> <table> <tr> <td></td> <td>Flats –</td> <td>£2,615</td> <td>sq m</td> </tr> <tr> <td></td> <td>Houses –</td> <td>£2,615</td> <td>sq m</td> </tr> </table> <p>Central (2)</p> <table> <tr> <td></td> <td>Flats –</td> <td>£2,615</td> <td>sq m</td> </tr> <tr> <td></td> <td>Houses –</td> <td>£2,615</td> <td>sq m</td> </tr> </table> <p>South (3)</p> <table> <tr> <td></td> <td>Flats –</td> <td>£2,685</td> <td>sq m</td> </tr> <tr> <td></td> <td>Houses –</td> <td>£2,685</td> <td>sq m</td> </tr> </table>		Flats –	£2,615	sq m		Houses –	£2,615	sq m		Flats –	£2,615	sq m		Houses –	£2,615	sq m		Flats –	£2,685	sq m		Houses –	£2,685	sq m
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		Intermediate North						
			Flats – Houses	£2,615	sq m			
			–	£2,615	sq m			
		Central (2)						
			Flats – Houses	£2,945	sq m			
			–	£2,945	sq m			
		South (3)						
			Flats – Houses	£3,300	sq m			
			–	£3,300	sq m			
						Yield	Rent free (months)	
		Mixed commercial rate 1	Capital value	£180	sq m	7.25%	12.00	
		Mixed commercial rate 2	Capital value	£250	sq m	6.75%	12.00	
		Mixed commercial rate 3	Capital value	£220	sq m	6.75%	12.00	
Assumption	Source	Notes						
				60%	40%	Affordable tenure split		
				Private	Affordable	Intermediate	Affordable Rent	
		Residential				70%	30%	
		Houses –	10 Units	6	4	2.8	1.2	
		Flats -	50 Units	30	20	14	6	
		Flats -	500 Units	300	200	140	60	
		Flats -	750 Units	450	300	210	90	
		Mixed						
		Flats -	500 Units	300	200	140	60	
		Flats -	750 Units	450	300	210	90	
				Apply?				
		S.106 Obligations	Yes	per unit	£1,000			
		Mayor CIL	Yes	per sq m	£50			

Assumption	Source	Notes
Scenarios		
Unit sizes	Industry standard and Stakeholder consultation	Residential floorspace is based upon industry standards of new build schemes. Two floor areas are displayed for flatted schemes: The Gross Internal Area (GIA) is used to calculate build costs and Net Internal Area (NIA) is applied to calculate the sales revenue. For the small housing sites (up to 5 units) larger dwellings are delivered in the borough, with medium and larger sites delivering more 'standard' unit sizes, we have therefore applied two unit sizes within our viability analysis.
		Affordable unit sizes for houses, are based upon HCA space standards (English Partnerships' Quality Standards Delivering Quality Places Revised: from November 2007) for a 3 bed 5 person home as a result these are smaller than the private units which are being delivered on site up to 5 units. Unit sizes are set out as follows:
		Private
		Private sale values Flats (NIA) 64 sq m
		Private sale values Flats (GIA) 75 sq m
		Private sale values Houses 92 sq.m
		Affordable units
		Affordable rent Flats (NIA) 64 sq m
		Affordable rent Flats (GIA) 75 sq m
		Affordable rent Houses 92 sq.m
		Shared ownership Flats (NIA) 64 sq m
		Shared ownership Flats (GIA) 75 sq m
		Shared ownership Houses 92 sq m
Houses 100 dwph		
Apartments low density - 150 dwph		
Apartments medium density - 200 dwph		
Apartments high density - 300 dwph		
Mixed commercial/resi site area 3 ha		

Earls Court Appraisal:

Assumption	Source	Notes																																	
	DVS assumptions	<p>It has been assumed on the commercial floor area that the gross to net ratio is 85% which is in line with industry standards for commercial space. In reality some uses will have larger ratio and some smaller.</p> <p style="text-align: center;">ECWK</p> <p style="text-align: center;">Number of residential units 8000 units</p> <p>Commercial floorspace - mixed commercial</p> <p style="text-align: right;">NIA 227,619 sq m</p> <p style="text-align: right;">GIA 267,787 sq m</p>																																	
Percentage split RBKC and LBHF and Affordable housing	DVS/LBHF	<p>The Earls Court development crosses the border of two boroughs. The DVS has provided a percentage split of the units to be delivered in each borough as follows:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">ECWK</th> <th style="text-align: center;">RBKC</th> <th style="text-align: center;">LBHF</th> </tr> </thead> <tbody> <tr> <td>Private dwellings</td> <td style="text-align: center;">400</td> <td style="text-align: center;">4320</td> </tr> <tr> <td>Affordable rent</td> <td style="text-align: center;">30</td> <td style="text-align: center;">1145</td> </tr> <tr> <td>Intermediate</td> <td style="text-align: center;">30</td> <td style="text-align: center;">1145</td> </tr> <tr> <td>Replacement social rent</td> <td></td> <td style="text-align: center;">590</td> </tr> <tr> <td>Social rented</td> <td style="text-align: center;">340</td> <td></td> </tr> </tbody> </table> <p>With regards to affordable housing provision on DVS scenario the following unit numbers have been applied:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: left;">ECWK</th> <th colspan="3" style="text-align: center;">Affordable tenure split</th> </tr> <tr> <th style="text-align: center;">Private</th> <th style="text-align: center;">Affordable</th> <th style="text-align: center;">Affordable Rent</th> <th style="text-align: center;">Inter</th> <th style="text-align: center;">Replacement</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">59%</td> <td style="text-align: center;">41%</td> <td style="text-align: center;">35.82%</td> <td style="text-align: center;">35.82 %</td> <td style="text-align: center;">28.35%</td> </tr> </tbody> </table>	ECWK	RBKC	LBHF	Private dwellings	400	4320	Affordable rent	30	1145	Intermediate	30	1145	Replacement social rent		590	Social rented	340		ECWK		Affordable tenure split			Private	Affordable	Affordable Rent	Inter	Replacement	59%	41%	35.82%	35.82 %	28.35%
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Unit sizes	DVS/LBHF	<p>Residential floorspace is based upon industry standards of new build schemes or areas provided by the DVS. Two floor areas are displayed for flatted schemes: The Gross Internal Area (GIA) is used to calculate build costs and Net Internal Area (NIA) is applied to calculate the sales revenue.</p> <p>Floors areas used have been based on DVS areas as follows:</p> <p>Market units</p> <table style="width: 100%;"> <tr> <td style="padding-left: 20px;">Flats (NIA)</td> <td style="text-align: center;">70</td> <td style="text-align: center;">sq m</td> </tr> <tr> <td style="padding-left: 20px;">Flats (GIA)</td> <td style="text-align: center;">86</td> <td style="text-align: center;">sq m</td> </tr> </table> <p>Affordable rent</p> <table style="width: 100%;"> <tr> <td style="padding-left: 20px;">Flats (NIA)</td> <td style="text-align: center;">70</td> <td style="text-align: center;">sq m</td> </tr> <tr> <td style="padding-left: 20px;">Flats (GIA)</td> <td style="text-align: center;">86</td> <td style="text-align: center;">sq m</td> </tr> </table> <p>Intermediate</p> <table style="width: 100%;"> <tr> <td style="padding-left: 20px;">Flats (NIA)</td> <td style="text-align: center;">70</td> <td style="text-align: center;">sq m</td> </tr> <tr> <td style="padding-left: 20px;">Flats (GIA)</td> <td style="text-align: center;">86</td> <td style="text-align: center;">sq m</td> </tr> </table>	Flats (NIA)	70	sq m	Flats (GIA)	86	sq m	Flats (NIA)	70	sq m	Flats (GIA)	86	sq m	Flats (NIA)	70	sq m	Flats (GIA)	86	sq m															
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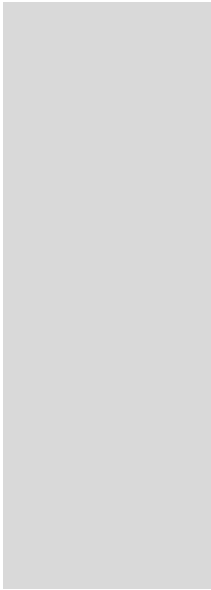
		Replacement affordable Flats (NIA) 70 sq m Flats (GIA) 86 sq m
Site areas		ECWK 32.6 ha
Obligations	Consultation with stakeholders	<p>Apply?</p> <p>S.106 Obligations Yes per unit £1,000</p> <p>Mayor CIL Yes per sq m £50</p>
Assumption	Source	Notes
Construction Costs		
	DVS build cost assumptions	<p>Residential build costs have been based on information from the DVS. A premium cost has been applied to those units being built in Kensington & Chelsea. The following rates have been used:</p> <p>Private</p> <p>Flats – £2,141 sq m LBHF - standard</p> <p>Private</p> <p>Flats – £2,955 sq m RBKC - premium</p> <p>Affordable Rent</p> <p>Flats – £1,328 sq m</p> <p>Intermediate</p> <p>Flats – £1,482 sq m</p> <p>Costs may alter in future. In particular, there may be national policy change regarding Code for Sustainable Homes building standards. The final effect of these changes on viability is difficult to foresee. While we have reviewed current Government research on cost impacts of CSH we note that past forecasts of price changes (such as that predicted in the original Cyril Sweet work) have never affected costs to the extent forecast. When these future requirements come into force, they will impact on both development costs and land values. We have not incorporated these possible impacts into our calculations, because CIL should deal with current market conditions, not forecasts of potential future change. Our approach to incorporating these (and other) potential but unknown costs is to set a wide margin for error that will cover variations in factors such as build costs, site conditions, and timing.</p>

		<p>Commercial</p> <p>The mixed commercial space within Earl's Court will comprise B1 offices, A1-A5 retail, C1 hotel/serviced apartments, D1/D2 uses, and C2 private hospital. These costs will vary depending on eventual specification of the units.</p> <p>The following build cost has been used to reflect mixed commercial use development. The cost per sq m has been calculated as taking the average of the total costs of the various uses against their total floor area.</p> <table border="0"> <tr> <td>Mixed commercial</td> <td>£1,693</td> <td>sq m</td> </tr> </table> <p>The cost to provide the ancillary area and depot has been reflected in the above DVS costs, therefore now separate cost allowance has been made in the appraisal but the floor areas are listed separately, as follows, to allow for analysis CIL chargeable area:</p> <table border="0"> <thead> <tr> <th></th> <th>Area sq m</th> <th>Cost per sq m</th> </tr> </thead> <tbody> <tr> <td>Ancillary and LU depot</td> <td>202,083</td> <td>£0</td> </tr> </tbody> </table>	Mixed commercial	£1,693	sq m		Area sq m	Cost per sq m	Ancillary and LU depot	202,083	£0
Mixed commercial	£1,693	sq m									
	Area sq m	Cost per sq m									
Ancillary and LU depot	202,083	£0									
Site preparation / Site abnormals & Infrastructure costs	DVS build cost assumptions	<p>Site preparation and infrastructure has been either calculated as a percentage of build costs or a rate per hectare as follows. Infrastructure and abnormal costs includes all of the site enabling works, roads, structural and civil infrastructure, off-site road improvements, site and off-site public transport improvements, utilities and site services, infrastructure abnormals which includes the decked structure over the railways etc, car parking, new building abnormals and public spaces. Other plot related costs have been applied to include: over-sailing costs, occupier contributions, building regs and NHBC fees etc, additional planning/reserved matters costs and void management costs.</p> <table border="0"> <tr> <td>£601,656</td> <td>per ha</td> <td>Site preparation and infrastructure</td> </tr> <tr> <td>£18,543,650</td> <td>per ha</td> <td>Infrastructure & abnormals</td> </tr> </table>	£601,656	per ha	Site preparation and infrastructure	£18,543,650	per ha	Infrastructure & abnormals			
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Professional Fees	Industry standards	<p>Professional fees relate to the costs incurred to bring the development forward and cover items such as; surveys, architects, quantity surveyor etc. Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs at 10%</p>									
Contingency	Industry standards	<p>Contingency is based upon the risk associated with each site and has been calculated as a percentage of build costs at 5%</p>									
Sale costs	Industry standards	<p>Sale costs relate to the costs incurred to dispose the completed residential units. These rates are based on industry accepted scales at the following rates:</p>									

		<p>Residential</p> <p>Sale agents fee 1.25% Gross Development Value of private units</p> <p>Sale legal fee £500 per unit</p> <p>Marketing £1,000 per private unit</p> <p>Commercial</p> <p>Sale agents fee 1.25% Gross Development Value</p> <p>Sale legal fee 1.25% Gross Development Value</p> <p>Letting agent fee 10% First year rent</p> <p>Letting legal fee 5.00% First year rent</p> <p>Marketing 4.00% First year rent</p>								
Finance costs	Industry standards	<p>When testing for development viability it is common practice to assume development is 100% debt financed (Viability Testing Local Plans - Advice for planning practitioners and RICS Financial viability in planning guidance note GN94/2012. Within our cashflow we used a finance rate based upon market rates of interest as follows:</p> <p>7%</p>								
Stamp Duty on Land Purchase	HMRC	<p>Stamp Duty Land Tax (SDLT) is generally payable on the purchase or transfer of property or land in the UK where the amount paid is above a certain threshold. The SDLT rates are by Treasury, the following rates current rates have been applied:</p> <table> <tbody> <tr> <td>up to £125,000</td> <td>0.00%</td> </tr> <tr> <td>Over £125,000 to £250,000</td> <td>1.00%</td> </tr> <tr> <td>Over £250,000 to £500,000</td> <td>3.00%</td> </tr> <tr> <td>Over £500,000</td> <td>4.00%</td> </tr> </tbody> </table>	up to £125,000	0.00%	Over £125,000 to £250,000	1.00%	Over £250,000 to £500,000	3.00%	Over £500,000	4.00%
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Over £250,000 to £500,000	3.00%									
Over £500,000	4.00%									
Professional fees on Land Purchase	Industry standards	<p>In addition to SDLT the purchaser of land will incur professional fees relating to the purchase. Fees associated with the land purchase are based upon the following industry standards:</p> <table> <tbody> <tr> <td>Surveyor -</td> <td>1.00%</td> </tr> <tr> <td>Legals -</td> <td>£25,000</td> </tr> </tbody> </table>	Surveyor -	1.00%	Legals -	£25,000				
Surveyor -	1.00%									
Legals -	£25,000									
Profit										
Developer's profit	Stakeholder consultation & industry standards	<p>A developer's return is based upon their attitude to risk. A developer's attitude to risk will depend on many factors that include but not exclusive to, development type (e.g. Greenfield, Brownfield, refurbishment, new build etc), development proposal (uses, mix and quantum), credit worthiness of developer, and current market conditions. The profit margin used is a gross margin thereby inclusive of central overheads, and is the minimum return required to obtain bank finance in the current market for the scheme proposed.</p> <table> <tbody> <tr> <td>Developer profit</td> <td>20%</td> <td>total development costs</td> </tr> </tbody> </table>	Developer profit	20%	total development costs					
Developer profit	20%	total development costs								
Time-scales										

Build rate units/per annum	Stakeholder consultation	<p>House builders typical build to sale. Therefore build rates are determined by market conditions of how many units can be sold on a monthly basis as developers do not want to be holding onto stock as this impacts their cashflow. It has been assumed that the affordable units will be sold during each phase and do not form part of any pre-sales. This is a conservative approach as in reality bulk sales of affordable housing may occur.</p> <table border="1"> <thead> <tr> <th colspan="2">Construction period</th> <th>Start</th> <th>Finish</th> <th>Length in months</th> </tr> </thead> <tbody> <tr> <td colspan="2">ECWK</td> <td>01 March 2013</td> <td>01 March 2037</td> <td>289</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="5">Sales period</th> </tr> <tr> <th colspan="2">ECWK</th> <th>Start</th> <th>Finish</th> <th>Length in months</th> </tr> </thead> <tbody> <tr> <td>Phase 1 pre-sales</td> <td>Flats –</td> <td>01 March 2014</td> <td>01 March 2026</td> <td>145</td> </tr> <tr> <td>Phase 1</td> <td>Flats –</td> <td>01 September 2014</td> <td>01 September 2026</td> <td>145</td> </tr> <tr> <td>Phase 2 pre-sales</td> <td>Flats –</td> <td>01 March 2026</td> <td>01 March 2038</td> <td>145</td> </tr> <tr> <td>Phase 2</td> <td>Flats –</td> <td>01 October 2026</td> <td>01 September 2038</td> <td>144</td> </tr> <tr> <td>Phase 1</td> <td>Ground rents</td> <td>01 September 2014</td> <td>01 September 2026</td> <td>145</td> </tr> <tr> <td>Phase 2</td> <td>Ground rents</td> <td>01 October 2026</td> <td>01 September 2038</td> <td>144</td> </tr> <tr> <td>Phase 1</td> <td>Mixed commercial</td> <td>01 September 2014</td> <td>01 September 2026</td> <td>145</td> </tr> <tr> <td>Phase 2</td> <td>Mixed commercial</td> <td>01 October 2026</td> <td>01 September 2038</td> <td>144</td> </tr> </tbody> </table>	Construction period		Start	Finish	Length in months	ECWK		01 March 2013	01 March 2037	289	Sales period					ECWK		Start	Finish	Length in months	Phase 1 pre-sales	Flats –	01 March 2014	01 March 2026	145	Phase 1	Flats –	01 September 2014	01 September 2026	145	Phase 2 pre-sales	Flats –	01 March 2026	01 March 2038	145	Phase 2	Flats –	01 October 2026	01 September 2038	144	Phase 1	Ground rents	01 September 2014	01 September 2026	145	Phase 2	Ground rents	01 October 2026	01 September 2038	144	Phase 1	Mixed commercial	01 September 2014	01 September 2026	145	Phase 2	Mixed commercial	01 October 2026	01 September 2038	144
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Residential land values	Stakeholder consultation	<p>Our estimates of benchmark land values are based on market comparables. Actual site values will vary to reflect the landowner's judgement and the extent to which the landowner takes account of the contextual nature of development, the site density achievable, the approach to the delivery of affordable housing (in the context of residential development), abnormal or site specific costs and expected S106 requirements and so on. It should also be noted that land values should ultimately be reduced to take account of CIL as suggested in the examiner's report into the Mayor of London's CIL³⁶. There are a wide range of permutations here. In order to make progress, we have to assume a central benchmark value, even though there could be a margin of error in practice.</p> <p>In establishing the benchmark land values we have examined a variety of land transactions in Hammersmith & Fulham using the following main sources:</p> <ul style="list-style-type: none"> *Land currently being marketed on the UK Land Directory website. *Consultations with local property agents and developers. <p>In some instances, the actual comparables we have used were provided in confidence and cannot be made public. These comparables generally relate to urban, brownfield sites, which were fully serviced with roads and major utilities to the site boundary. In collecting</p>																																																												

³⁶ The Planning Inspectorate (2012) *Report on the Examination of the Draft Mayoral Community Infrastructure Levy Charging Schedule*



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Historically we would expect that land values for smaller sites would be higher, because the offsite contribution policy. In this assessment we have assumed that a new policy is in place and will remove the disparity in land values. This approach is in line with the Harman report which advises authorities to work on the basis of future policy and its effects on land values. The following land value has been used in the viability testing:

£15,000,000 per net developable hectare

Revenue							
Sales value of completed scheme	Land Registry, and consultation	Property values are derived from different sources, depending on land use. For housing, Land Registry data forms a basis for analysis. This provides a full record of all individual transactions. This data is then supplemented following conversations with agents and house builders' sales representatives, which allows us to form a view on new build sales values. Values used are as follows:					
		ECWK Private sale values	Flats –	£11,000	sq m		
Affordable housing (Section 106)	DVS/LBHF assumptions	The DVS has applied a price premium to those units being built in RBKC and the following sale value has been used:					
		RBKC Private sale values	Flats –	£13,500	sq m		
Affordable housing (Section 106)	DVS/LBHF assumptions	Following consultation with Register Providers and house builders we have assumed a blended average of intermediate and affordable rented accommodation in line with current policy as follows:					
		Affordable rent	Flats –	£2,260	sq m		
		Intermediate	Flats –	£2,260	sq m		
		Social rent	Flats –	£2,260	sq m		
Commercial	Egi, CoStar, and consultation with commercial agents.	Similar to the private sale values a higher affordable housing value has been used by the DVS for the affordable units in RBKC. The following rates have been used					
		Affordable rent	Flats –	£2,500	sq m		
		Intermediate	Flats –	£2,500	sq m		
		Social rent	Flats –	£2,500	sq m		
Commercial	Egi, CoStar, and consultation with commercial agents.	The Earl's Court development will provide a mix of commercial uses to include offices, hotels, and leisure. In the assessment of viability a blended rent and yield has been applied. In reality some uses will command both a higher yield and rent and others lower.					
		Mixed commercial rate	Capital value	£220	sq m	Yield	Rent free (months)
		Ground rents	annual rent	£400	per unit	6.75%	12.00
						6.00%	

White City Appraisals:

Assumption	Source	Notes
Construction Costs		
	BCIS Online - Rebased for LB Hammersmith & Fulham - November 2013	<p>Residential build costs are based upon industry data from the Build Cost Information Service (BCIS) which is produced by the Royal Institution of Chartered Surveyors (RICS). BCIS offers a range of prices dependent on the final specification.</p> <p>The following build costs used are derived from recent data of actual prices in the marketplace. For flats we have used upper quartile rates for 6+ storey development. For houses we have also used upper quartile rates. As early as 2009, the market across the UK was building at round Code for Sustainable Homes Level 3 to 4 for private and Level 4 for affordable housing. Depending on actual scheme specification costs could greatly vary from the BCIS data. However, the costs are based on a 'typical residential development' in the area with no specific consideration of scheme features which may result in a 'premium' product and could follow through into enhanced sale values.</p>
Private		
	Flats –	£1,801 sq m
	Houses -	£1,187 sq m
Affordable		
	Flats –	£1,801 sq m
	Houses –	£1,187 sq m
<p>Costs may alter in future. In particular, there may be national policy change regarding Code for Sustainable Homes building standards. The final effect of these changes on viability is difficult to foresee. While we have reviewed current Government research on cost impacts of CSH we note that past forecasts of price changes (such as that predicted in the original Cyril Sweet work) have never affected costs to the extent forecast. When these future requirements come into force, they will impact on both development costs and land values. We have not incorporated these possible impacts into our calculations, because CIL should deal with current market conditions, not forecasts of potential future change. Our approach to incorporating these (and other) potential but unknown costs is to set a wide margin for error that will cover variations in factors such as build costs, site conditions, and timing.</p>		
Commercial		
	Mixed commercial	£1,559 sq m
<p>The majority of commercial space is to comprise offices. As such we have used median build costs for air-conditioned offices. In reality, dependent upon the mix of uses, build costs may vary from this figure.</p>		

Plot external	Industry standards	Site preparation and infrastructure has been either calculated as a percentage of 5% of build costs		
Professional Fees	Industry standards	Professional fees relate to the costs incurred to bring the development forward and cover items such as; surveys, architects, quantity surveyor etc. Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs at 10%		
Contingency	Industry standards	Contingency is based upon the risk associated with each site and has been calculated as a percentage of build costs at 5%		
Sale costs	Industry standards	Sale costs relate to the costs incurred to dispose the completed residential units. These rates are based on industry accepted scales at the following rates:		
	Industry standards	Residential		
		Sale agents fee	1.25%	Gross Development Value of private units
		Sale legal fee	£500	per unit
		Marketing	£1,000	per private unit
		Commercial		
		Sale agents fee	1.25%	Gross Development Value
		Sale legal fee	1.25%	Gross Development Value
		Letting agent fee	10%	First year rent
		Letting legal fee	5.00%	First year rent
Finance costs	Industry standards	When testing for development viability it is common practice to assume development is 100% debt financed (Viability Testing Local Plans - Advice for planning practitioners and RICS Financial viability in planning guidance note GN94/2012. Within our cashflow we used a finance rate based upon market rates of interest at 7%.		
Stamp Duty on Land Purchase	HMRC	Stamp Duty Land Tax (SDLT) is generally payable on the purchase or transfer of property or land in the UK where the amount paid is above a certain threshold. The SDLT rates are by Treasury, the following rates current rates have been applied:		
		up to £125,000	0.00%	
		Over £125,000 to £250,000	1.00%	
		Over £250,000 to £500,000	3.00%	
		Over £500,000	4.00%	
Professional fees on Land Purchase	Industry standards	In addition to SDLT the purchaser of land will incur professional fees relating to the purchase. Fees associated with the land purchase are based upon the following industry standards:		
		Surveyor – 1%		
		Legals -	£25,000	

Profit						
Developer's return	Stakeholder consultation & industry standards	<p>A developer's return is based upon their attitude to risk. A developer's attitude to risk will depend on many factors that include but not exclusive to, development type (e.g. Greenfield, Brownfield, refurbishment, new build etc), development proposal (uses, mix and quantum), credit worthiness of developer, and current market conditions. We have applied profit at the following percentage of build costs:</p> <p>Developer return 20% on total development costs</p>				
Time-scales						
Build rate units/per annum	Stakeholder consultation	House builders typically build to sell. Therefore build rates are determined by market conditions of how many units can be sold on a monthly basis as developers do not want to be holding onto stock as this impacts their cashflow. It has been assumed that the affordable units will be sold during each phase and do not form part of any pre-sales. This is a conservative approach as in reality bulk sales of affordable housing may occur.				
		Construction period		Start	Finish	
					Length in months	
		White City 1 Flats - 500	01 April 2013	30 September 2014	18	
		White City commercial 1 8,500	01 April 2013	30 September 2014	18	
		White City 2 Flats - 750	01 April 2013	30 June 2015	27	
		White City commercial 2 12,750	01 April 2013	30 June 2015	27	
		White City 3 Flats - 100	01 April 2013	30 March 2014	12	
		Sales period		Start	Finish	Length in months
		White City 1				
Flats 500	Phase 1 pre sales	01 January 2014	30 January 2014	1		
	Phase 1	01 February 2014	01 July 2014	6		
	Phase 2 pre sales	01 October 2014	30 October 2014	1		
	Phase 2	01 November 2014	01 April 2015	6		
White City 2						
Flats 750	Phase 1 pre sales	01 May 2014	30 May 2014	1		

		Phase 1		01 June 2014	01 February 2015	9
		Phase 2				
		pre sales		01 April 2015	30 April 2015	1
		Phase 2		01 May 2015	01 January 2016	9
White City 1						
		Commercial Phase 1	4,250	01 January 2014	30 January 2014	1
		Commercial Phase 2	4,250	01 October 2014	30 October 2014	1
White City 2						
		Commercial Phase 1	4,250	01 May 2014	30 May 2014	1
		Commercial Phase 2	4,250	01 April 2015	30 April 2015	1
White City 3						
		Flats - 100		01 April 2014	30 September 2014	6
Benchmark land value per ha						
Residential land values	Stakeholder consultation	<p>Our estimates of benchmark land values are based on market comparables. Actual site values will vary to reflect the landowner's judgement and the extent to which the landowner takes account of the contextual nature of development, the site density achievable, the approach to the delivery of affordable housing (in the context of residential development), abnormal or site specific costs and expected S106 requirements and so on. It should also be noted that land values should ultimately be reduced to take account of CIL as suggested in the examiner's report into the Mayor of London's CIL³⁷. There are a wide range of permutations here. In order to make progress, we have to assume a central benchmark value, even though there could be a margin of error in practice.</p> <p>In establishing the benchmark land values we have examined a variety of land transactions in Hammersmith & Fulham using the following main sources:</p> <p>*Land currently being marketed on the UK Land Directory website. *Consultations with local property agents and developers.</p> <p>In some instances, the actual comparables we have used were provided in confidence and cannot be made public. These comparables generally relate to urban, brownfield sites, which were fully serviced with roads and major utilities to the site boundary. In collecting evidence on residential land values, we aimed to distinguish between sites that deliver flats and housing sites - this is due to development densities.</p>				

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		Historically we would expect that land values for smaller sites would be higher, because the offsite contribution policy. In this assessment we have assumed that a new policy is in place and will remove the disparity in land values. This approach is in line with the Harman report which advises authorities to work on the basis of future policy and its effects on land values. The following land value has been used in the viability testing: £14,000 per ha.			
Revenue					
Sales value of completed scheme	Land Registry, and consultation	Property values are derived from different sources, depending on land use. For housing, Land Registry data forms a basis for analysis. This provides a full record of all individual transactions. This data is then supplemented following conversations with agents and house builders' sales representatives, which allows us to form a view on new build sales values. Values used are as follows			
		White City			
		Private sale values	Flats –	£7,630	sq m
		Private sale values	Houses –	£7,630	sq m
Affordable housing (Section 106)	Industry standard discount	Following consultation with house builders we have assumed a blended average of intermediate and affordable rented accommodation in line with current policy as follows:			
		White City			
			Flats –	£1,733	sq m
			Houses –	£0	sq m
		Intermediate White City			
	Flats –	£2,699	sq m		
	Houses –	£2,699	sq m		
	White City commercial	Capital value	£250	sq m	
Assumption	Source				
Residential scenarios	Client team & developer workshop		Private	Intermediate	Affordable tenure split
			60%	40%	Social rent Inter-mediate
		White City			
		White City 1			
		Flats -	500	300	125 75
		White City 2			
		Flats -	750	450	187.5 112.5
		White City 3			
Flats -	100	60	25 15		
		Apply?			
	S.106 Obligations	Yes	per unit	£1,000	

		Mayor CIL	Yes	per sq m	£50
Scenarios					
Unit sizes	Industry standard and Stakeholder consultation	<p>Residential floorspace is based upon industry standards of new build schemes. Two floor areas are displayed for flatted schemes: The Gross Internal Area (GIA) is used to calculate build costs and Net Internal Area (NIA) is applied to calculate the sales revenue. For the small housing sites (up to 5 units) larger dwellings are delivered in the borough, with medium and larger sites delivering more 'standard' unit sizes, we have therefore applied two unit sizes within our viability analysis.</p> <p>Affordable unit sizes for houses, are based upon HCA space standards (English Partnerships' Quality Standards Delivering Quality Places Revised: from November 2007) for a 3 bed 5 person home as a result these are smaller than the private units which are being delivered on site up to 5 units. Unit sizes are set out as follows:</p>			
		Private			
		Private sale values	Flats (NIA)	64	sq m
		Private sale values	Flats (GIA)	75	sq m
		Private sale values	Houses	92	sq.m
		Affordable units			
		Affordable rent	Flats (NIA)	64	sq m
		Affordable rent	Flats (GIA)	75	sq m
		Affordable rent	Houses	92	sq.m
		Shared ownership	Flats (NIA)	64	sq m
		Shared ownership	Flats (GIA)	75	sq m
		Shared ownership	Houses	92	sq m
Densities	Client team and Stakeholder consultation	Houses	100	dwph	
		Apartments low density -	150	dwph	
		Apartments medium density -	200	dwph	
		Apartments high density -	300	dwph	
		Mixed commercial/resi site area	3	ha	

White City PBA & DIFS Cost/Value Comparison

	DIFS assumptions	PBA assumptions	PBA comment
Residential – market	£6,966-8,073/m2	£7,630/m2	The DIF is based on market data in February 2012 data. PBA data is based on current market data (January 2014). In the space of approximately two years the market has improved significantly from the DIFS base figure and higher values can be justified based on current evidence.
Commercial uses	Offices - £4,427/m2 Retail tier 1 - £21,917/m2 Retail tier 2 - £3,305/m2 Hotel - £2,799/m2 Leisure - £1,254/m2 M&S Mock shop - £2,172/m2	Blended commercial capital value of £3,700/m2	DIFS assumptions are Capital values broken down per use type and, PBA's assumption is based on a blended value. We have assumed offices would form the bulk of the development which is in line with the DIFS assumption on commercial mix. It is a reasonable assumption that the office element will generate the majority of the commercial elements value and such it is a reasonable assumption to use this use within the testing.
Residential build costs*	Private £2,530/m2 Private tower £3,000/m2 Affordable £1,940/m2	£1,801/m2	DIFS costs are based on October 2011 prices. PBA costs are based on BCIS data (upper quartile for residential and median costs for commercial based on office costs). BCIS build cost data is a robust data source when dealing with this level of viability testing and has been used elsewhere in this study. November 2013.
Commercial build costs*	Offices - £2,210/m2 Retail tier 1 - £1,550/m2 Retail tier 2 - £1,100/m2 Hotel - £3,000/m2 M&S Mock shop - £1,000/m2	Blended commercial cost of £1,559/m2	* In comparing build costs it must be noted that DIFS build costs include 12.5% for professional fees and 5% contingency. PBA's build costs do not include fees and contingency as these are shown separately in the appraisals as 10% professional fees and 5% contingency.

	DIFS assumptions	PBA assumptions	PBA comment
			Current market evidence of comparable schemes shows that 10% for professional fees and 5% for contingency are reasonable in the current market.

Non-Residential Appraisals

Assumption	Source	Notes																																				
Costs																																						
		Through the course of the development plan period the Council envisages commercial development to occur. We have reflected future commercial development through testing the following commercial uses and unit sizes:																																				
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		We have assumed the following net to gross site development percentages to allow for roads, SuDs, landscape and open space:																																				
Net to gross site developable area	PBA & developer workshop	<table border="1"> <thead> <tr> <th></th> <th>Net site area (ha)</th> </tr> </thead> <tbody> <tr> <td>HTC offices</td> <td>0.25</td> </tr> <tr> <td>Ex HTC offices</td> <td>0.25</td> </tr> <tr> <td>All industrial single</td> <td>0.50</td> </tr> <tr> <td>All convenience retail</td> <td>0.07</td> </tr> <tr> <td>All comparison retail</td> <td>0.07</td> </tr> <tr> <td>Hotels (100 bed)</td> <td>0.25</td> </tr> <tr> <td>Student accommodation (250 bed)</td> <td>0.30</td> </tr> <tr> <td>Leisure use</td> <td>0.15</td> </tr> </tbody> </table>		Net site area (ha)	HTC offices	0.25	Ex HTC offices	0.25	All industrial single	0.50	All convenience retail	0.07	All comparison retail	0.07	Hotels (100 bed)	0.25	Student accommodation (250 bed)	0.30	Leisure use	0.15																		
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	BCIS Online - Rebased for LB Hammersmith & Fulham - November 2013	<p>Build costs are based on median rates adjusted for location derived from BCIS Review of Building Prices online version data of actual prices in the marketplace. All major non-domestic development which does not qualify for assessment under Code for Sustainable Homes will to be built to a minimum of BREAM (Building Research Establishment Assessment Method) Very Good standard.</p> <p>This excludes any allowance for externals which is treated separately.</p> <p>This excludes any allowance for externals which is treated separately.</p> <table border="1"> <tbody> <tr> <td>Town centre office</td> <td>£1,739</td> <td>sq m</td> </tr> <tr> <td>Ex HTC offices</td> <td>£1,559</td> <td>sq m</td> </tr> <tr> <td>All industrial single</td> <td>£560</td> <td>sq m</td> </tr> <tr> <td>All convenience retail</td> <td>£1,241</td> <td>sq m</td> </tr> <tr> <td>All comparison retail</td> <td>£898</td> <td>sq m</td> </tr> <tr> <td>Hotels (100 bed)</td> <td>£1,076</td> <td>sq m</td> </tr> <tr> <td>Hotels (100 bed)</td> <td>£1,556</td> <td>sq m</td> </tr> <tr> <td>Student accommodation (250 bed)</td> <td>£1,563</td> <td>sq m</td> </tr> </tbody> </table>	Town centre office	£1,739	sq m	Ex HTC offices	£1,559	sq m	All industrial single	£560	sq m	All convenience retail	£1,241	sq m	All comparison retail	£898	sq m	Hotels (100 bed)	£1,076	sq m	Hotels (100 bed)	£1,556	sq m	Student accommodation (250 bed)	£1,563	sq m												
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Hotels (100 bed)	£1,556	sq m																																				
Student accommodation (250 bed)	£1,563	sq m																																				

		Leisure use Median & 'generally' build costs have been used for all uses, except for town centre offices where upper quartile has been used. This is to reflect the need to deliver higher quality development within the town centre. Office build costs are based on an air-conditioned unit.	£1,541 sq m																										
Plot external	Industry standards	These cover external build costs for site preparation and includes items such as internal access roads, landscaping, open space, drainage, utilities and services within the site. We have allowed the following percentage of build costs for these items. 5% These exclude abnormal site development costs and exceptional offsite infrastructure.																											
Demolition	Industry standards	Not applied £0																											
Developer contribution (Section 106 /or CIL)	Client team & developer workshop	For this assessment we have been asked not to factor any S106 or developer contribution into the appraisals. Decision on this will be determined later. Contributions to infrastructure costs such as education, open space and transportation etc. will need to be factored into this and decisions on strategic infrastructure cost contributions that may be via a CIL will need to be factored in.	<table border="1"> <thead> <tr> <th>Amount</th> <th>Apply?</th> </tr> </thead> <tbody> <tr> <td>Mayor CIL Calculated as a £ psm</td> <td>£50</td> <td>Yes</td> </tr> <tr> <td>Office CIL Calculated as a £ psm</td> <td>£80</td> <td>No</td> </tr> <tr> <td>Industrial CIL Calculated as a £ psm</td> <td>£0</td> <td>No</td> </tr> <tr> <td>Convenience retail CIL Calculated as a £ psm</td> <td>£80</td> <td>No</td> </tr> <tr> <td>Comparison retail CIL Calculated as a £ psm</td> <td>£80</td> <td>No</td> </tr> <tr> <td>Hotel CIL Calculated as a £ psm</td> <td>£80</td> <td>No</td> </tr> <tr> <td>Student accommodation CIL Calculated as a £ psm</td> <td>£80</td> <td>No</td> </tr> <tr> <td>Leisure CIL Calculated as a £ psm</td> <td>£80</td> <td>No</td> </tr> </tbody> </table>	Amount	Apply?	Mayor CIL Calculated as a £ psm	£50	Yes	Office CIL Calculated as a £ psm	£80	No	Industrial CIL Calculated as a £ psm	£0	No	Convenience retail CIL Calculated as a £ psm	£80	No	Comparison retail CIL Calculated as a £ psm	£80	No	Hotel CIL Calculated as a £ psm	£80	No	Student accommodation CIL Calculated as a £ psm	£80	No	Leisure CIL Calculated as a £ psm	£80	No
Amount	Apply?																												
Mayor CIL Calculated as a £ psm	£50	Yes																											
Office CIL Calculated as a £ psm	£80	No																											
Industrial CIL Calculated as a £ psm	£0	No																											
Convenience retail CIL Calculated as a £ psm	£80	No																											
Comparison retail CIL Calculated as a £ psm	£80	No																											
Hotel CIL Calculated as a £ psm	£80	No																											
Student accommodation CIL Calculated as a £ psm	£80	No																											
Leisure CIL Calculated as a £ psm	£80	No																											
Professional Fees	Industry standards	Professional fees are based upon accepted industry standards and has been calculated as a percentage of build costs at 8%																											
Contingency	Industry standard & developer workshop	Contingency is based upon the risk associated with each site and has been calculated as a percentage of construction costs at 5%																											
Sale costs	Industry standards	These rates are based on industry accepted scales at the following rates: Marketing (offices & industrial) £15,000 Marketing (comparison retail) £25,000 Letting agent fee 10%																											

Finance costs	Industry standards	Letting legals (offices)	£20,000		
		Letting legals (industrial, and retail)	5%		
		Sale agents fee	1.25%		
		Sale legal fees	1.25%		
		Based upon the likely cost of development finance we have used current market rates of interest.			
		7%			
Stamp Duty on Land Purchase	HMRC	These are the current rates set by Treasury at the following rates:			
		up to £150,000	0.00%		
		Over £150,000 to £250,000	1.00%		
		Over £250,000 to £500,000	3.00%		
		Over £500,000	4.00%		
Professional fees on Land Purchase	Industry standards	Fees associated with the land purchase are based upon the following industry standards:			
		Surveyor -	1.00%		
		Legals -	0.50%		
Profit	Industry standards	Gross development profit (includes overheads) taken as a percentage of total development costs			
		20%			
Time-scales - build rate units/per annum	Consultations	Build rate time-scales reflect solely the construction period of the commercial unit itself and assumes a cleared service site free of abnormals. The build rates for each of the commercial uses are set out as follows:			
			Start	Finish	Length in months
		HTC offices	01 Mar 13	30 Apr 14	14
		Ex HTC offices	01 Mar 13	30 Apr 14	14
		All industrial single	01 Mar 13	30 Nov 13	9
		All convenience retail	01 Mar 13	28 Feb 14	12
		All comparison retail	01 Mar 13	28 Feb 14	12
		Hotels (100 bed)	01 Mar 13	28 Feb 14	12
		Student accommodation (250 bed)	01 Mar 13	28 Feb 14	12
Leisure use	01 Mar 13	30 Nov 13	9		
Revenue					
Capital values (rents, yields, and tenant incentives)	CoStar/Focus & consultations	We have assumed that the completed commercial unit is sold on practical completion as an investment sale. The income on the investment sale will be deferred depending on the length of rent free period required to attract a tenant. The rent free period is therefore the tenants incentive. Rents, yield and rent free periods are based upon market evidence and are set out as follows:			
		Rent	Yield	Rent free (months)	
		HTC offices	£425	7.00%	12
		Ex HTC offices	£250	7.00%	12
		All industrial single	£135	8.50%	18
		All convenience retail	£250	4.75%	12

		All comparison retail	£350	7.00%	12
		Hotels (100 bed)	£6,500	6.00%	0
		Student accommodation (250 bed)	£10,800	6.10%	0
		Leisure use	£215	6.50%	3
Benchmark land value per ha					
		Our estimates of benchmark land values are based on market comparables derived through consultation with stakeholders and analysis of published data on CoStar. At this current point in the economic cycle there is much uncertainty surrounding land values due to the small number of transactions occurring.			
	CoStar/Focus & consultations	HTC offices	£14,000,000		
		Ex HTC offices	£10,000,000		
		All industrial single	£3,000,000		
		All convenience retail	£10,000,000		
		All comparison retail	£10,000,000		
		Hotels (100 bed)	£10,000,000		
		Student accommodation (250 bed)	£14,000,000		
		Leisure use	£5,000,000		

Appendix B Affordable Housing Parameters

CIL: AFFORDABLE HOUSING PARAMETERS FOR MODELLING

The policy compliant scenario is considered to be 1A + 2 + 3B + 4 + 5 which results in an overall tenure mix of:

- 60% market
- 19.6% discounted market sale
- 8.4% shared ownership
- 12% affordable rent

1) ALTERNATIVE PROPORTIONS OF AFFORDABLE HOUSING

A	B	C
40%	30%	20%

Source: Core Strategy DPD (LBHF, October 2011) Policy H2 Affordability

2) BED SIZES

	1 bed	2 bed	3 bed	4 bed
Intermediate	50%	35%	15%	
Affordable Rent	10%	40%	35%	15%
Social Rent	As affordable rent or in accordance with replacement need			

Source: Development Management Local Plan (LBHF, July 2013) Policy A3 Housing Mix

3) ALTERNATIVE AFFORDABLE TENURE SPLITS

	A	B
Intermediate	100%	70%
Affordable rent (including any social rent)	0%	30%

4) INTERMEDIATE HOUSING AFFODABILITY MIXES

See Affordability Thresholds in London Plan AMR 9 (GLA, March 2013)

5) AFFORDABLE RENT MAXIMUM LEVELS (including service charges)

1 bed	2 bed	3 bed	4 bed
£250 pw	£290 pw	£340pw	£400 pw

Source: Interim Guidance to Social Landlords on the Affordable Rent Tenure (LBHF, September 2011)

6) GRANT OPTIONS to be modelled for all the above options

	A	B
Affordable Rent	£30,000/unit	£0
Shared Ownership	£12,000/unit	£0
Discounted Market Sale	£0	£0

Appendix C Viability Appraisals



Houses –	10.0	Units	N1				
ITEM							
Net Site Area	0.10		£15,023,878	per ha			
Yield	10.00	Private	Affordable				
		6.00	4.00				
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats –		0.00	64	0	£5,985	£0
	Houses –		6.00	92	552	£4,970	£2,743,440
			6.00		552		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats –		0.00	64	0	£0	£0
	Houses –		1.20	92	110	£2,615	£288,696
			1.20		110		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats –		0.00	64	0	£2,615	£0
	Houses –		2.80	92	258	£2,615	£673,624
			2.80		258		
Gross Development value			10.00				£3,705,760
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)					£1,555,145	
				Less stamp duty and tax	4.00%		
				Agents fee	1.00%		
				Legal fee	£25,000		
£1,502,387.84							
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats –		0.00	75	0	£1,801	£0.00
	Houses –		6.00	92	552	£1,187	£655,224.00
			6.00		552		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats –		0.00	75	0	£1,801	£0.00
	Houses –		4.00	92	368	£1,187	£436,816.00
			4.00		368		
			10.00	920			£1,092,040
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs			5%			£54,602.00
£54,602							
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs		10%				£114,664
£114,664							
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs		5%				£57,332.10
£57,332							
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£10,000
2.7.2	Mayor CIL		£50	per sq m			£27,600
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
£37,600							
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£34,293
2.8.2	Sale legal fee		£500				£5,000
2.8.3	Marketing		£1,000				£8,000
£45,293							
TOTAL DEVELOPMENT COSTS (excluding land)							
£1,401,531							
TOTAL DEVELOPMENT COSTS (including land)							
£2,956,676							
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£591,335.28
£591,335							
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							
£3,548,012							
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							
£157,748							
4.00	Finance Costs		APR	7.00%	PCM	0.565%	-£157,748
TOTAL PROJECT COSTS [INCLUDING INTEREST]							
£3,705,760							

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Houses –		10.0	Units	C1			
ITEM							
Net Site Area		0.10				£25,969,743	per ha
Yield		10.00	Private	Affordable		6.00	4.00
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats –		0.00	64	0	£8,025	£0
	Houses –		6.00	92	552	£7,500	£4,140,000
			6.00		552		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats –		0.00	64	0	£2,615	£0
	Houses –		1.20	92	110	£2,615	£288,696
			1.20		110		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats –		0.00	64	0	£2,945	£0
	Houses –		2.80	92	258	£2,945	£758,632
			2.80		258		
Gross Development value						10.00	£5,187,328
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£2,707,341
						Less stamp duty and tax	4.00%
						Agents fee	1.00%
						Legal fee	£25,000
							£2,596,974.27
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats –		0.00	75	0	£1,801	£0.00
	Houses –		6.00	92	552	£1,187	£655,224.00
			6.00		552		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats –		0.00	75	0	£1,801	£0.00
	Houses –		4.00	92	368	£1,187	£436,816.00
			4.00		368		
						10.00	920
							£1,092,040
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs			5%			£54,602.00
							£54,602
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs			10%			£114,664
							£114,664
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs			5%			£57,332.10
							£57,332
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£10,000
2.7.2	Mayor CIL		£50	per sq m			£27,600
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£37,600
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£51,750
2.8.2	Sale legal fee		£500				£5,000
2.8.3	Marketing		£1,000				£8,000
							£62,750
TOTAL DEVELOPMENT COSTS (excluding land)							£1,418,988
TOTAL DEVELOPMENT COSTS (including land)							£4,126,330
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£825,266
							£825,266
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£4,951,596
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£235,732
4.00	Finance Costs		APR	7.00%	PCM	0.565%	-£235,732
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£5,187,328

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Houses –	10.0	Units	S1			
ITEM						
Net Site Area	0.10			£40,546,340	per ha	
Yield	10.00	Private	Affordable			
		6.00	4.00			
1.0 Development Value						
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm
	Flats –		0.00	64	0	£11,385
	Houses –		6.00	92	552	£10,895
			6.00		552	
						Total Value
						£0
						£6,014,040
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm
	Flats –		0.00	64	0	£2,685
	Houses –		1.20	92	110	£2,685
			1.20		110	
						Total Value
						£0
						£296,424
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm
	Flats –		0.00	64	0	£3,300
	Houses –		2.80	92	258	£3,300
			2.80		258	
						Total Value
						£0
						£850,080
Gross Development value				10.00	£7,160,544	
2.0 Development Cost						
2.1 Site Acquisition						
2.1.1	Site value (residual land value)					£4,241,720
				Less stamp duty and tax		4.00%
				Agents fee		1.00%
				Legal fee		£25,000
						£4,054,634.04
2.3 Build Costs						
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m
	Flats –		0.00	75	0	£1,801
	Houses –		6.00	92	552	£1,187
			6.00		552	
						Total Costs
						£0.00
						£655,224.00
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m
	Flats –		0.00	75	0	£1,801
	Houses –		4.00	92	368	£1,187
			4.00		368	
						Total Costs
						£0.00
						£436,816.00
				10.00	920	£1,092,040
2.4 Construction Costs						
2.4.1	external works as a percentage of build costs		5%			£54,602.00
						£54,602
2.5 Professional Fees						
2.5.1	as percentage of build costs and construction costs		10%			£114,664
						£114,664
2.6 Contingency						
2.6.1	as percentage of build costs and construction costs		5%			£57,332.10
						£57,332
2.7 Developer contributions						
2.7.1	S.106 Obligations		£1,000	per unit	£10,000	
2.7.2	Mayor CIL		£50	per sq m	£27,600	
2.7.3	H&F Residential CIL		£0	per sq m	£0	
2.7.4	H&F Commercial CIL		£0	per sq m	£0	
2.7.5	Lifetime homes		£0	per flat	£0	
						£37,600
2.8 Sale cost						
2.8.1	Sale agents fee		1.25%			£75,176
2.8.2	Sale legal fee		£500			£5,000
2.8.3	Marketing		£1,000			£8,000
						£86,176
TOTAL DEVELOPMENT COSTS (excluding land)						£1,442,414
TOTAL DEVELOPMENT COSTS (including land)						£5,684,134
3.0 Developers' Profit						
3.1	Developer return calculated as a percentage of total development costs		Rate	20%	£1,136,826.77	
						£1,136,827
TOTAL PROJECT COSTS [EXCLUDING INTEREST]						£6,820,961
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]						£339,583
4.00	Finance Costs		APR	7.00%	PCM	0.565%
						-£339,583
TOTAL PROJECT COSTS [INCLUDING INTEREST]						£7,160,544

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Flats -		50.0	Units	N2			
ITEM							
Net Site Area		0.33		£9,734,860	per ha		
Yield		50.00	Private	30.00	Affordable		
					20.00		
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats -		30.00	64	1,913	£5,985	£11,446,313
	Houses -		0.00	92	0	£4,970	£0
			30.00		1,913		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats -		6.00	64	383	£2,615	£1,000,238
	Houses -		0.00	92	0	£0	£0
			6.00		383		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Flats -		14.00	64	893	£2,615	£2,333,888
	Houses -		0.00	92	0	£2,615	£0
			14.00		893		
Gross Development value			50.00				£14,780,438
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£3,389,424
							Less stamp duty and tax
							Agents fee
							Legal fee
							4.00%
							1.00%
							£25,000
						£3,244,953.18	
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		30.00	75	2,250	£1,801	£4,052,250
	Houses -		0.00	92	0	£1,187	£0.00
			30.00		2,250		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		20.00	75	1,500	£1,801	£2,701,500.00
	Houses -		0.00	0	0	£1,187	£0.00
			20.00		1,500		
			50.00		3750		£6,753,750
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs			5%			£337,687.50
						£337,688	
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs			10%			£709,144
						£709,144	
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs			5%			£354,571.88
						£354,572	
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£50,000
2.7.2	Mayor CIL		£50	per sq m			£112,500
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
						£162,500	
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£143,079
2.8.2	Sale legal fee		£500				£25,000
2.8.3	Marketing		£1,000				£30,000
						£198,079	
TOTAL DEVELOPMENT COSTS (excluding land)						£8,515,732	
TOTAL DEVELOPMENT COSTS (including land)						£11,905,156	
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£2,381,031
						£2,381,031	
TOTAL PROJECT COSTS [EXCLUDING INTEREST]						£14,286,188	
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]						£494,250	
4.00 Finance Costs							
			APR	7.00%	PCM	0.565%	-£494,250
TOTAL PROJECT COSTS [INCLUDING INTEREST]						£14,780,438	

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Flats -		50.0	Units	C2			
ITEM							
Net Site Area		0.33		£19,072,527	per ha		
Yield		50.00	Private	30.00	Affordable		
					20.00		
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	Epsm	Total Value
	Flats -		30.00	64	1,913	£8,025	£15,347,813
	Houses -		0.00	92	0	£7,500	£0
			30.00		1,913		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	Epsm	Total Value
	Flats -		6.00	64	383	£2,615	£1,000,238
	Houses -		0.00	92	0	£2,615	£0
			6.00		383		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	Epsm	Total Value
	Flats -		14.00	64	893	£2,945	£2,628,413
	Houses -		0.00	92	0	£2,945	£0
			14.00		893		
Gross Development value			50.00				£18,976,463
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£6,665,799
						Less stamp duty and tax	4.00%
						Agents fee	1.00%
						Legal fee	£25,000
							£6,357,509
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		30.00	75	2,250	£1,801	£4,052,250
	Houses -		0.00	92	0	£1,187	£0.00
			30.00		2,250		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		20.00	75	1,500	£1,801	£2,701,500
	Houses -		0.00	0	0	£1,187	£0.00
			20.00		1,500		
			50.00		3750		£6,753,750
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs			5%			£337,687.50
							£337,688
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs			10%			£709,144
							£709,144
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs			5%			£354,571.88
							£354,572
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£50,000
2.7.2	Mayor CIL		£50	per sq m			£112,500
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£162,500
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£191,848
2.8.2	Sale legal fee		£500				£25,000
2.8.3	Marketing		£1,000				£30,000
							£246,848
TOTAL DEVELOPMENT COSTS (excluding land)						£8,564,501	
TOTAL DEVELOPMENT COSTS (including land)						£15,230,300	
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£3,046,060
							£3,046,060
TOTAL PROJECT COSTS [EXCLUDING INTEREST]						£18,276,360	
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]						£700,103	
4.00 Finance Costs							
			APR	7.00%	PCM	0.565%	-£700,103
TOTAL PROJECT COSTS [INCLUDING INTEREST]						£18,976,463	

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Flats -		50.0	Units	S2			
ITEM							
Net Site Area		0.33	£34,132,906 per ha				
Yield		50.00	Private	Affordable			
			30.00	20.00			
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	Epsm	Total Value
	Flats -		30.00	64	1,913	£11,385	£21,773,813
	Houses -		0.00	92	0	£10,895	£0
			30.00		1,913		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	Epsm	Total Value
	Flats -		6.00	64	383	£2,685	£1,027,013
	Houses -		0.00	92	0	£2,685	£0
			6.00		383		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	Epsm	Total Value
	Flats -		14.00	64	893	£3,300	£2,945,250
	Houses -		0.00	92	0	£3,300	£0
			14.00		893		
Gross Development value			50.00				£25,746,075
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£11,950,142
					Less stamp duty and tax	4.00%	
					Agents fee	1.00%	
					Legal fee		£25,000
							£11,377,635
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		30.00	75	2,250	£1,801	£4,052,250
	Houses -		0.00	92	0	£1,187	£0.00
			30.00		2,250		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		20.00	75	1,500	£1,801	£2,701,500
	Houses -		0.00	0	0	£1,187	£0.00
			20.00		1,500		
			50.00		3750		£6,753,750
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs		5%				£337,687.50
							£337,688
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs		10%				£709,144
							£709,144
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs		5%				£354,571.88
							£354,572
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000 per unit				£50,000
2.7.2	Mayor CIL		£50 per sq m				£112,500
2.7.3	H&F Residential CIL		£0 per sq m				£0
2.7.4	H&F Commercial CIL		£0 per sq m				£0
2.7.5	Lifetime homes		£0 per flat				£0
							£162,500
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£272,173
2.8.2	Sale legal fee		£500				£25,000
2.8.3	Marketing		£1,000				£30,000
							£327,173
TOTAL DEVELOPMENT COSTS (excluding land)							£8,644,826
TOTAL DEVELOPMENT COSTS (including land)							£20,594,968
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate 20%				£4,118,994
							£4,118,994
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£24,713,962
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£1,032,113
4.00 Finance Costs							
			APR 7.00%		PCM 0.565%		-£1,032,113
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£25,746,075

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Flats -		500.0	Units	N3			
ITEM							
Net Site Area		2.50			£44,744,039 per ha		
Yield		500.00	Private	Affordable			
			300.00	200.00			
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 pre sales Flats --		75.00	64	4,781	£11,385	£54,434,531
	Phase 1 Flats --		75.00	64	4,781	£11,385	£54,434,531
	Phase 2 pre sales Flats --		75.00	64	4,781	£11,385	£54,434,531
	Phase 2 Flats --		75.00	64	4,781	£11,385	£54,434,531
			300.00		19125		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats --		30.00	64	1,913	£2,685	£5,135,063
	Phase 2 Flats --		30.00	64	1,913	£2,685	£5,135,063
			60.00		3825		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats --		70.00	64	4,463	£3,300	£14,726,250
	Phase 2 Flats --		70.00	64	4,463	£3,300	£14,726,250
			140.00		8925		
Gross Development value			500.00				£257,460,750
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£117,721,155
				Less stamp duty and tax		4.00%	
				Agents fee		1.00%	
				Legal fee		£25,000	
							£111,860,098
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		300.00	75	22,500	£1,801	£40,522,500
	Flats --		0.00	0	0	£1,187	£0.00
			300.00		22500		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		200.00	75	15,000	£1,801	£27,015,000
	Flats --		0.00	0	0	£1,187	£0.00
			200.00		15000		
			500.00	37500			£67,537,500
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs		5%				£3,376,875.00
							£3,376,875
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs		10%				£7,091,438
							£7,091,438
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs		5%				£3,545,718.75
							£3,545,719
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£500,000
2.7.2	Mayor CIL		£50	per sq m			£1,125,000
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£1,625,000
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£2,041,295
2.8.2	Sale legal fee		£500				£250,000
2.8.3	Marketing		£1,000				£300,000
							£2,591,295
TOTAL DEVELOPMENT COSTS (excluding land)							£85,767,826
TOTAL DEVELOPMENT COSTS (including land)							£203,488,982
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£40,697,796.31
							£40,697,796
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£244,186,778
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£13,273,972
4.00 Finance Costs							
			APR	7.00%	PCM	0.565%	-£13,273,972
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£257,460,750



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Flats -	500.0	Units	C3				
ITEM							
Net Site Area	2.50			£24,983,625	per ha		
Yield	500.00	Private	Affordable	300.00	200.00		
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 pre sales	Flats --	75.00	64	4,781	£8,025	£38,369,531
	Phase 1	Flats --	75.00	64	4,781	£8,025	£38,369,531
	Phase 2 pre sales	Flats --	75.00	64	4,781	£8,025	£38,369,531
	Phase 2	Flats --	75.00	64	4,781	£8,025	£38,369,531
			300.00		19125		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1	Flats --	30.00	64	1,913	£2,615	£5,001,188
	Phase 2	Flats --	30.00	64	1,913	£2,615	£5,001,188
			60.00		3825		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1	Flats --	70.00	64	4,463	£2,945	£13,142,063
	Phase 2	Flats --	70.00	64	4,463	£2,945	£13,142,063
			140.00		8925		
Gross Development value			500.00		31875		£189,764,625
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£65,720,066
				Less stamp duty and tax		4.00%	
				Agents fee		1.00%	
				Legal fee		£25,000	
							£62,459,063
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		300.00	75	22,500	£1,801	£40,522,500
	Flats --		0.00	0	0	£1,187	£0.00
			300.00		22500		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		200.00	75	15,000	£1,801	£27,015,000
	Flats --		0.00	0	0	£1,187	£0.00
			200.00		15000		
			500.00		37500		£67,537,500
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs		5%				£3,376,875
							£3,376,875
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs		10%				£7,091,438
							£7,091,438
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs		5%				£3,545,718.75
							£3,545,719
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£500,000
2.7.2	Mayor CIL		£50	per sq m			£1,125,000
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£1,625,000
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£1,438,857
2.8.2	Sale legal fee		£500				£250,000
2.8.3	Marketing		£1,000				£300,000
							£1,988,857
TOTAL DEVELOPMENT COSTS (excluding land)							£85,165,389
TOTAL DEVELOPMENT COSTS (including land)							£150,885,455
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£30,177,090.90
							£30,177,091
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£181,062,545
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£8,702,080
4.00	Finance Costs		APR	7.00%	PCM	0.565%	-£8,702,080
TOTAL PROJECT COSTS (INCLUDING INTEREST)							£189,764,625

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Flats -		500.0	Units	N3			
ITEM							
Net Site Area		2.50		£12,734,805	per ha		
Yield		500.00	Private	300.00	Affordable		
					200.00		
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 pre sales Flats –		75.00	64	4,781	£5,985	£28,615,781
	Phase 1 Houses –		75.00	64	4,781	£5,985	£28,615,781
	Phase 2 pre sales Flats –		75.00	64	4,781	£5,985	£28,615,781
	Phase 2 Houses –		75.00	64	4,781	£5,985	£28,615,781
			300.00		19125		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats –		30.00	64	1,913	£2,615	£5,001,188
	Phase 2 Flats –		30.00	64	1,913	£2,615	£5,001,188
			60.00		3825		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats –		70.00	64	4,463	£2,615	£11,669,438
	Phase 2 Flats –		70.00	64	4,463	£2,615	£11,669,438
			140.00		8925		
Gross Development value			500.00				£147,804,375
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£33,486,329
						Less stamp duty and tax	4.00%
						Agents fee	1.00%
						Legal fee	£25,000
							£31,837,013
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats –		300.00	75	22,500	£1,801	£40,522,500
	Flats –		0.00	0	0	£1,187	£0.00
			300.00		22500		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats –		200.00	75	15,000	£1,801	£27,015,000
	Flats –		0.00	0	0	£1,187	£0.00
			200.00		15000		
			500.00		37500		£67,537,500
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs		5%				£3,376,875.00
							£3,376,875
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs		10%				£7,091,438
							£7,091,438
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs		5%				£3,545,718.75
							£3,545,719
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£500,000
2.7.2	Mayor CIL		£50	per sq m			£1,125,000
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£1,625,000
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£1,073,092
2.8.2	Sale legal fee		£500				£250,000
2.8.3	Marketing		£1,000				£300,000
							£1,623,092
TOTAL DEVELOPMENT COSTS (excluding land)							£84,799,623
TOTAL DEVELOPMENT COSTS (including land)							£118,285,952
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£23,657,190
							£23,657,190
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£141,943,143
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£5,861,232
4.00 Finance Costs							
			APR	7.00%	PCM	0.565%	-£5,861,232
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£147,804,375



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Flats -		750.0	Units	N4			
ITEM							
Net Site Area		2.50				£18,180,792	per ha
Yield		750.00	Private	Affordable		450.00	300.00
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 pre sales Flats -		112.50	64	7,172	£5,985	£42,923,672
	Phase 1 Flats -		112.50	64	7,172	£5,985	£42,923,672
	Phase 2 pre sales Flats -		112.50	64	7,172	£5,985	£42,923,672
	Phase 2 Flats -		112.50	64	7,172	£5,985	£42,923,672
			450.00		28688		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats -		45.00	64	2,869	£2,615	£7,501,781
	Phase 2 Flats -		45.00	64	2,869	£2,615	£7,501,781
			90.00		5738		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats -		105.00	64	6,694	£2,615	£17,504,156
	Phase 2 Flats -		105.00	64	6,694	£2,615	£17,504,156
			210.00		13388		
Gross Development value			750.00				£221,706,563
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£47,817,874
						Less stamp duty and tax	4.00%
						Agents fee	1.00%
						Legal fee	£25,000
							£45,451,981
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		450.00	75	33,750	£1,801	£60,783,750
	Flats -		0.00	0	0	£0	£0
			450.00		33750		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats -		300.00	75	22,500	£1,801	£40,522,500
			0.00	0	0	£0	£0.00
			300.00		22500		
			750.00		56250		£101,306,250
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs		5%				£5,065,313
							£5,065,313
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs		10%				£10,637,156
							£10,637,156
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs		5%				£5,318,578.13
							£5,318,578
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£750,000
2.7.2	Mayor CIL		£50	per sq m			£1,687,500
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£2,437,500
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£2,146,184
2.8.2	Sale legal fee		£500				£375,000
2.8.3	Marketing		£1,000				£450,000
							£2,971,184
TOTAL DEVELOPMENT COSTS (excluding land)							£127,735,980
TOTAL DEVELOPMENT COSTS (including land)							£175,553,855
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate				£35,110,771
			20%				
							£35,110,771
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£210,664,626
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£11,041,937
4.00 Finance Costs							
			APR		PCM		
			7.00%		0.565%		-£11,041,937
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£221,706,563



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Flats -		750.0	Units	S4			
ITEM							
Net Site Area		2.50					£64,818,300 per ha
Yield		750.00	Private	Affordable			
			450.00	300.00			
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 pre sales Flats --		112.50	64	7,172	£11,385	£81,651,797
	Phase 1 Flats --		112.50	64	7,172	£11,385	£81,651,797
	Phase 2 pre sales Flats --		112.50	64	7,172	£11,385	£81,651,797
	Phase 2 Flats --		112.50	64	7,172	£11,385	£81,651,797
			450.00		28,688		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats --		45.00	64	2,869	£2,685	£7,702,594
	Phase 2 Flats --		45.00	64	2,869	£2,685	£7,702,594
			90.00		5,738		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats --		105.00	64	6,694	£3,300	£22,089,375
	Phase 2 Flats --		105.00	64	6,694	£3,300	£22,089,375
			210.00		13,388		
Gross Development value			750.00				£386,191,125
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£170,548,158
						Less stamp duty and tax	4.00%
						Agents fee	1.00%
						Legal fee	£25,000
							£162,045,750
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		450.00	75	33,750	£1,801	£60,783,750
	Flats --		0.00	0	0	£0	£0.00
			450.00		33,750		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		300.00	75	22,500	£1,801	£40,522,500
	Flats --		0.00	0	0	£0	£0.00
			300.00		22,500		
			750.00		56,250		£101,306,250
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs		5%				£5,065,312.50
							£5,065,313
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs		10%				£10,637,156
							£10,637,156
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs		5%				£5,318,578.13
							£5,318,578
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£750,000
2.7.2	Mayor CIL		£50	per sq m			£1,687,500
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£2,437,500
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£4,082,590
2.8.2	Sale legal fee		£500				£375,000
2.8.3	Marketing		£1,000				£450,000
							£4,907,590
TOTAL DEVELOPMENT COSTS (excluding land)							£129,672,387
TOTAL DEVELOPMENT COSTS (including land)							£300,220,545
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£60,044,108.98
							£60,044,109
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£360,264,654
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£25,926,471
4.00 Finance Costs							
			APR	7.00%	PCM	0.565%	-£25,926,471
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£386,191,125



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Flats -		750.0	Units	C4			
ITEM							
Net Site Area		2.50					£42,084,525 per ha
Yield		750.00	Private	Affordable			450.00 300.00
1.0 Development Value							
1.1	Private Units		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 pre sales Flats --		112.50	64	7,172	£8,025	£57,554,297
	Phase 1 Flats --		112.50	64	7,172	£8,025	£57,554,297
	Phase 2 pre sales Flats --		112.50	64	7,172	£8,025	£57,554,297
	Phase 2 Flats --		112.50	64	7,172	£8,025	£57,554,297
			450.00		28688		
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats --		45.00	64	2,869	£2,615	£7,501,781
	Phase 2 Flats --		45.00	64	2,869	£2,615	£7,501,781
			90.00		5738		
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	£psm	Total Value
	Phase 1 Flats --		105.00	64	6,694	£2,945	£19,713,094
	Phase 2 Flats --		105.00	64	6,694	£2,945	£19,713,094
			210.00		13388		
Gross Development value				750.00			£284,646,938
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£110,722,434
						Less stamp duty and tax	4.00%
						Agents fee	1.00%
						Legal fee	£25,000
							£105,211,312
2.3 Build Costs							
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		450.00	75	33,750	£1,801	£60,783,750
	Flats --		0.00	0	0	£0	£0.00
			450.00		33750		
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs
	Flats --		300.00	75	22,500	£1,801	£40,522,500
	Flats --		0.00	0	0	£0	£0.00
			300.00		22500		
				750.00	56250		£101,306,250
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs			5%			£5,065,312.50
							£5,065,313
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs			10%			£10,637,156
							£10,637,156
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs			5%			£5,318,578.13
							£5,318,578
2.7 Developer contributions							
2.7.1	S.106 Obligations		£1,000	per unit			£750,000
2.7.2	Mayor CIL		£50	per sq m			£1,687,500
2.7.3	H&F Residential CIL		£0	per sq m			£0
2.7.4	H&F Commercial CIL		£0	per sq m			£0
2.7.5	Lifetime homes		£0	per flat			£0
							£2,437,500
2.8 Sale cost							
2.8.1	Sale agents fee		1.25%				£2,877,715
2.8.2	Sale legal fee		£500				£375,000
2.8.3	Marketing		£1,000				£450,000
							£3,702,715
TOTAL DEVELOPMENT COSTS (excluding land)							£128,467,512
TOTAL DEVELOPMENT COSTS (including land)							£239,189,945
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs		Rate	20%			£25,693,502.34
							£25,693,502
TOTAL PROJECT COSTS (EXCLUDING INTEREST)							£264,883,448
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)							£19,763,490
4.00	Finance Costs		APR	7.00%	PCM	0.565%	-£19,763,490
TOTAL PROJECT COSTS (INCLUDING INTEREST)							£284,646,938



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ITEM		Private		Affordable		Yield	
Plats - Mixed - 500 resi & 8,500 sq m commercial N5		300.00		200.00		500.00	
Net Site Area		£6,924,265 per ha					
Development Value							
1.1	Private Units	No. of units	Size sq.m	Total sq.m	£psm	Total Value	
	Phase 1 pre sales Flats -	75.00	64	4,781	£5,985	£28,615,781	
	Phase 1 Flats -	75.00	64	4,781	£5,985	£28,615,781	
	Phase 2 pre sales Flats -	75.00	64	4,781	£5,985	£28,615,781	
	Phase 2 Flats -	75.00	64	4,781	£5,985	£28,615,781	
		300.00		19125			
1.2	Affordable rent	No. of units	Size sq.m	Total sq.m	£psm	Total Value	
	Phase 1 Flats -	30.00	64	1,913	£2,615	£5,001,188	
	Phase 2 Flats -	30.00	64	1,913	£2,615	£5,001,188	
		60.00		3825			
1.3	Intermediate	No. of units	Size sq.m	Total sq.m	£psm	Total Value	
	Phase 1 Flats -	70.00	64	4,463	£2,615	£11,669,438	
	Phase 2 Flats -	70.00	64	4,463	£2,615	£11,669,438	
		140.00		8925			
1.4	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		1.00	4250	4,250	£180	7%	£10,551,724
						Rent free period	Adjusted for rent free
						12	£9,838,437.42
						No. of months	4.00%
						Less stamp duty and tax	Net capital value
							£9,444,990
1.5	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		1.00	4250	4,250	£180	7%	£10,551,724
						Rent free period	Adjusted for rent free
						12	£9,838,437.42
						No. of months	4.00%
						Less stamp duty and tax	Net capital value
							£9,444,990
Gross Development value		500.00				£166,694,175	
2.0	Development Cost						
2.1	Site Acquisition						
2.1.1	Site value (residual land value)					£28,155,573	
						Less stamp duty and tax	
						4.00%	
						Agents fee	
						1.00%	
						Legal fee	
						£25,000	
						£26,772,794	
2.3	Build Costs						
2.3.1	Private units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Flats -	300.00	75	22,500	£1,801	£40,522,500.00	
	Flats -	0.00	0	0	£0	£0.00	
		300.00		22500			
2.3.2	Affordable units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Flats -	200.00	75	15,000	£1,801	£27,015,000.00	
	Flats -	0.00	0	0	£0	£0.00	
		200.00		15000			
2.3.3	Commercial units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
		1.00	10000	10,000	£1,559	£15,590,000.00	
		500.00		47,500		£83,127,500	
2.4	Construction Costs						
2.4.1	external works as a percentage of build costs	5%				£4,156,375.00	
						£4,156,375	
2.5	Professional Fees						
2.5.1	as percentage of build costs and construction costs	10%				£8,728,388	
						£8,728,388	
2.6	Contingency						
2.6.1	as percentage of build costs and construction costs	5%				£4,364,193.75	
						£4,364,194	
2.7	Developer contributions						
2.7.1	S.106 Obligations	£1,000 per unit				£300,000	
2.7.2	Mayor CIL	£50 per unit				£2,375,000	
2.7.3	H&F Residential CIL	£0 per sq m				£0	
2.7.4	H&F Commercial CIL	£0 per flat				£0	
2.7.5	Lifetime homes	£0 per unit				£0	
						£2,675,000	
2.8	Sale cost						
2.8.1	Residential Sale agents fee	1.25%				£1,430,789	
2.8.2	Residential Sale legal fee	£500				£250,000	
2.8.3	Commercial phase 1 Marketing	£1,000				£300,000	
2.8.4	Commercial phase 1 Sale agents fee	1.25%				£1,131,897	
2.8.5	Commercial phase 1 Sale legal fee	1.25%				£1,131,897	
2.8.6	Commercial phase 1 Letting agent fee	10.00%				£75,500	
2.8.7	Commercial phase 1 Letting legal fee	5.00%				£38,250	
2.8.8	Commercial phase 2 Marketing	4%				£30,600	
2.8.9	Commercial phase 2 Sale agents fee	1.25%				£1,131,897	
2.8.10	Commercial phase 2 Sale legal fee	1.25%				£1,131,897	
2.8.11	Commercial phase 2 Letting agent fee	10.00%				£75,500	
2.8.12	Commercial phase 2 Letting legal fee	5.00%				£38,250	
2.8.13	Commercial phase 2 Marketing	4%				£30,600	
						£2,799,075	
TOTAL DEVELOPMENT COSTS (excluding land)						£105,850,532	
TOTAL DEVELOPMENT COSTS (including land)						£134,006,104	
3.0	Developers' Profit						
3.1	Developer return calculated as a percentage of total development costs	Rate		20%		£26,801,221	
						£26,801,221	
TOTAL PROJECT COSTS (EXCLUDING INTEREST)						£160,807,325	
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)						£5,886,849	
4.00	Finance Costs	APR		PCM		-£5,886,849	
		7.00%		0.565%			
TOTAL PROJECT COSTS (INCLUDING INTEREST)						£166,694,175	

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ITEM		Private		Affordable			
Net Site Area		3.00		£36,932.885 per ha			
Yield		500.00		300.00		200.00	
pba peterbrett							
Flats - Mixed - 500 resi & 8,500 sq m commercial SS							
1.0 Development Value							
1.1	Private Units	No. of units	Size sq.m	Total sq.m	Epsm	Total Value	
	Phase 1 pre sales Flats -	75.00	64	4,781	£11,385	£54,434,531	
	Phase 1 Flats -	75.00	64	4,781	£11,385	£54,434,531	
	Phase 2 pre sales Flats -	75.00	64	4,781	£11,385	£54,434,531	
	Phase 2 Flats -	75.00	64	4,781	£11,385	£54,434,531	
		300.00		19125			
1.2	Affordable rent	No. of units	Size sq.m	Total sq.m	Epsm	Total Value	
	Phase 1 Flats -	30.00	64	1,913	£2,685	£5,135,063	
	Phase 2 Flats -	30.00	64	1,913	£2,685	£5,135,063	
		60.00		3825			
1.3	Intermediate	No. of units	Size sq.m	Total sq.m	Epsm	Total Value	
	Phase 1 Flats -	70.00	64	4,463	£3,300	£14,726,250	
	Phase 2 Flats -	70.00	64	4,463	£3,300	£14,726,250	
		140.00		8925			
1.4	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		1.00	4250	4,250	£220	7%	£13,851,851.85
						Rent free period	Adjusted for rent free
						12	£12,975,973.63
							4.00%
							Net capital value
							£12,456,935
1.5	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		1.00	4250	4,250	£220	7%	£13,851,851.85
						Rent free period	Adjusted for rent free
						12	£12,975,973.63
							4.00%
							Net capital value
							£12,456,935
Gross Development value		500.00				£282,374,619	
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)					£116,603,848	
						Less stamp duty and tax	
						4.00%	
						Agents fee	
						1.00%	
						Legal fee	
						£25,000	
						£110,798,655	
2.3 Build Costs							
2.3.1	Private units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Phase 1 pre sales Flats -	300.00	75	22,500	£1,801	£40,527,500	
	Phase 1 Flats -	0.00	0	0	£0	£0.00	
		300.00		22500			
2.3.2	Affordable units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Phase 1 Flats -	200.00	75	15,000	£1,801	£27,015,000	
	Phase 2 Flats -	0.00	0	0	£0	£0.00	
		200.00		15000			
2.3.3	Commercial units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
		1.00	10000	10,000	£1,859	£18,590,000	
		500.00		47,500		£83,127,500	
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs	5%				£4,156,375	
						£4,156,375	
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs	10%				£8,728,388	
						£8,728,388	
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs	5%				£4,364,193.75	
						£4,364,194	
2.7 Developer contributions							
2.7.1	S.106 Obligations	£1,000 per unit				£300,000	
2.7.2	Mayor CIL	£50 per unit				£2,375,000	
2.7.3	H&F Residential CIL	£0 per sq m				£0	
2.7.4	H&F Commercial CIL	£0 per flat				£0	
2.7.5	Lifetime homes	£0 per unit				£0	
						£2,675,000	
2.8 Sale cost							
Residential							
2.8.1	Sale agents fee	1.25%				£2,721,727	
2.8.2	Sale legal fee	£500				£250,000	
2.8.3	Marketing	£1,000				£300,000	
Commercial phase 1							
2.8.4	Sale agents fee	1.25%				£173,148	
2.8.5	Sale legal fee	1.25%				£173,148	
2.8.6	Letting agent fee	10.00%				£93,500	
2.8.7	Letting legal fee	5.00%				£46,750	
2.8.8	Marketing	4%				£37,400	
Commercial phase 2							
2.8.9	Sale agents fee	1.25%				£173,148	
2.8.10	Sale legal fee	1.25%				£173,148	
2.8.11	Letting agent fee	10.00%				£93,500	
2.8.12	Letting legal fee	5.00%				£46,750	
2.8.13	Marketing	4%				£37,400	
						£4,319,619	
TOTAL DEVELOPMENT COSTS (excluding land)						£107,371,075	
TOTAL DEVELOPMENT COSTS (including land)						£223,974,923	
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs	Rate		20%		£44,794,984.64	
						£44,794,985	
TOTAL PROJECT COSTS (EXCLUDING INTEREST)							
						£268,769,908	
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)							
						£13,604,712	
4.00 Finance Costs							
		APR		PCM			
		7.00%		0.565%		-	
						£13,604,712	
TOTAL PROJECT COSTS (INCLUDING INTEREST)						£282,374,619	


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Flats - Mixed - 500 resi & 8,500 sq m commercial CS									
ITEM									
Net Site Area		3.00		£21,323,848 per ha					
Yield		500.00		Private 300.00		Affordable 200.00			
1.0 Development Value									
1.1	Private Units	No. of units	Size sq.m	Total sq.m	Epam	Total Value			
	Phase 1 pre sales Flats -	75.00	64	4,781	£8,025	£38,369,531			
	Phase 1 Flats -	75.00	64	4,781	£8,025	£38,369,531			
	Phase 2 pre sales Flats -	75.00	64	4,781	£8,025	£38,369,531			
	Phase 2 Flats -	75.00	64	4,781	£8,025	£38,369,531			
		300.00		19125					
1.2	Affordable rent	No. of units	Size sq.m	Total sq.m	Epam	Total Value			
	Phase 1 Flats -	30.00	64	1,913	£2,615	£5,001,188			
	Phase 2 Flats -	30.00	64	1,913	£2,615	£5,001,188			
		60.00		3825					
1.3	Intermediate	No. of units	Size sq.m	Total sq.m	Epam	Total Value			
	Phase 1 Flats -	70.00	64	4,463	£2,945	£13,142,063			
	Phase 2 Flats -	70.00	64	4,463	£2,945	£13,142,063			
		140.00		8925					
1.4	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value		
		1.00	4250	4,250	£250	7%	£15,740,741		
				No. of months	Rent free period		Adjusted for rent free		
					12		£14,745,424.58		
				Less stamp duty and tax		4.00%	Net capital value		
							£14,155,608		
1.5	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value		
		1.00	4250	4,250	£250	7%	£15,740,741		
				No. of months	Rent free period		Adjusted for rent free		
					12		£14,745,424.58		
				Less stamp duty and tax		4.00%	Net capital value		
							£14,155,608		
Gross Development value		500.00		£218,075,840					
2.0 Development Cost									
2.1 Site Acquisition									
2.1.1	Site value (residual land value)							£67,312,151	
		Less stamp duty and tax						4.00%	
								1.00%	
								£25,000	
								Legal fee	
								£25,000	
2.3 Build Costs								£63,971,544	
2.3.1	Private units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs			
	Flats -	300.00	75	22,500	£1,801	£40,527,500			
	Flats -	0.00	0	0	£0	£0.00			
		300.00		22500					
2.3.2	Affordable units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs			
	Flats -	200.00	75	15,000	£1,801	£27,015,000			
	Flats -	0.00	0	0	£1,187	£0.00			
		200.00		15000					
2.3.3	Commercial units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs			
		1.00	10000	10,000	£1,859	£18,590,000			
500.00		47,500		£83,127,500					
2.4 Construction Costs									
2.4.1	external works as a percentage of build costs	5%		£4,156,375					
£4,156,375									
2.5 Professional Fees									
2.5.1	as percentage of build costs and construction costs	10%		£8,728,388					
£8,728,388									
2.6 Contingency									
2.6.1	as percentage of build costs and construction costs	5%		£4,364,193.75					
£4,364,194									
2.7 Developer contributions									
2.7.1	S.106 Obligations	£1,000 per unit		£300,000					
2.7.2	Mayor CIL	£50 per unit		£2,375,000					
2.7.3	H&F Residential CIL	£0 per sq m		£0					
2.7.4	H&F Commercial CIL	£0 per flat		£0					
2.7.5	Lifetime homes	£0 per unit		£0					
£2,675,000									
2.8 Sale cost									
2.8.1	Residential Sale agents fee	1.25%		£1,918,477					
2.8.2	Residential Sale legal fee	£500		£250,000					
2.8.3	Commercial phase 1 Marketing	£1,000		£300,000					
2.8.4	Commercial phase 1 Sale agents fee	1.25%		£196,759					
2.8.5	Commercial phase 1 Sale legal fee	1.25%		£196,759					
2.8.6	Commercial phase 1 Letting agent fee	10.00%		£106,250					
2.8.7	Commercial phase 1 Letting legal fee	5.00%		£53,125					
2.8.8	Commercial phase 2 Marketing	4%		£42,500					
2.8.9	Commercial phase 2 Sale agents fee	1.25%		£196,759					
2.8.10	Commercial phase 2 Sale legal fee	1.25%		£196,759					
2.8.11	Commercial phase 2 Letting agent fee	10.00%		£106,250					
2.8.12	Commercial phase 2 Letting legal fee	5.00%		£53,125					
2.8.13	Commercial phase 2 Marketing	4%		£42,500					
£3,659,264									
TOTAL DEVELOPMENT COSTS (excluding land)		£106,710,720							
TOTAL DEVELOPMENT COSTS (including land)		£174,022,871							
3.0 Developers' Profit									
3.1	Developer return calculated as a percentage of total development costs	Rate 20%		£34,804,574.27					
£34,804,574									
TOTAL PROJECT COSTS (EXCLUDING INTEREST)		£208,827,445							
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)		£9,248,395							
4.0 Finance Costs									
		APR 7.00%		PCM 0.565%		£9,248,395			
TOTAL PROJECT COSTS (INCLUDING INTEREST)		£218,075,840							




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Flats - North		Mixed - 750 resi & 12,750 sq m commercial		N6			
ITEM							
Net Site Area		3.00		£12,982,666 per ha			
Yield		750.00		Private 450.00, Affordable 300.00			
							
1.0 Development Value							
1.1	Private Units	No. of units	Size sq.m	Total sq.m	Epms	Total Value	
	Phase 1 pre sales Flats -	112.50	64	7,172	£5,985	£42,923,672	
	Phase 1 Flats -	112.50	64	7,172	£5,985	£42,923,672	
	Phase 2 pre sales Flats -	112.50	64	7,172	£5,985	£42,923,672	
	Phase 2 Flats -	112.50	64	7,172	£5,985	£42,923,672	
		450.00		28,688			
1.2	Affordable rent	No. of units	Size sq.m	Total sq.m	Epms	Total Value	
	Phase 1 Flats -	45.00	64	2,869	£2,615	£7,501,781	
	Phase 2 Flats -	45.00	64	2,869	£2,615	£7,501,781	
		90.00		5,738			
1.3	Intermediate	No. of units	Size sq.m	Total sq.m	Epms	Total Value	
	Phase 1 Flats -	105.00	64	6,694	£2,615	£17,504,156	
	Phase 2 Flats -	105.00	64	6,694	£2,615	£17,504,156	
		210.00		13,388			
1.4	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		1.00	6375	6,375	£180	7%	£17,000,000
				No. of months		Rent free period	Adjusted for rent free
						12	£15,925,058.55
				Less stamp duty and tax		4.00%	Net capital value
							£15,288,056
1.5	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		1.00	6375	6,375	£180	7%	£17,000,000
				No. of months		Rent free period	Adjusted for rent free
						12	£15,925,058.55
				Less stamp duty and tax		4.00%	Net capital value
							£15,288,056
Gross Development value		750.00		47813		£252,282,675	
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)					£40,971,577	
				Less stamp duty and tax	4.00%	£17,000,000	
				Agents fee	1.00%	£25,000	
				Legal fee			
						£38,947,998	
2.3 Build Costs							
2.3.1	Private units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Flats -	450.00	75	33,750	£1,801	£60,783,750	
		0.00	0	0	£1,187	£0.00	
		450.00		33750			
2.3.2	Affordable units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Flats -	300.00	75	22,500	£1,801	£40,522,500	
		0.00	0	0	£1,187	£0.00	
		300.00		22500			
2.3.3	Commercial units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
		1.00	15000	15,000	£1,559	£23,385,000	
		750.00		71,250		£124,691,250	
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs	5%				£6,234,563	
						£6,234,563	
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs	10%				£13,082,581	
						£13,082,581	
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs	5%				£6,546,291	
						£6,546,291	
2.7 Developer contributions							
2.7.1	S.106 Obligations	£1,000 per unit				£450,000	
2.7.2	Mayor CIL	£50 per unit				£3,562,500	
2.7.3	H&F Residential CIL	£0 per sq m				£0	
2.7.4	H&F Commercial CIL	£0 per flat				£0	
2.7.5	Lifetime homes	£0 per unit				£0	
						£4,012,500	
2.8 Sale cost							
Residential							
2.8.1	Sale agents fee	1.25%				£2,146,184	
2.8.2	Sale legal fee	£500				£375,000	
2.8.3	Marketing	£1,000				£450,000	
Commercial phase 1							
2.8.4	Sale agents fee	1.25%				£212,500	
2.8.5	Sale legal fee	1.25%				£212,500	
2.8.6	Letting agent fee	10.00%				£114,750	
2.8.7	Letting legal fee	5.00%				£57,375	
2.8.8	Marketing	4%				£45,900	
Commercial phase 2							
2.8.9	Sale agents fee	1.25%				£212,500	
2.8.10	Sale legal fee	1.25%				£212,500	
2.8.11	Letting agent fee	10.00%				£114,750	
2.8.12	Letting legal fee	5.00%				£57,375	
2.8.13	Marketing	4%				£45,900	
						£4,257,234	
TOTAL DEVELOPMENT COSTS (excluding land)							
£158,834,418							
TOTAL DEVELOPMENT COSTS (including land)							
£199,805,995							
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs	Rate 20%				£39,961,196.96	
						£39,961,199	
TOTAL PROJECT COSTS (EXCLUDING INTEREST)							
£239,767,194							
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)							
£12,515,481							
4.0 Finance Costs							
		APR 7.00%	PCM 0.565%			£12,515,481	
TOTAL PROJECT COSTS (INCLUDING INTEREST)							
£252,282,675							
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Plats - Mixed - 750 resi & 12,750 sq m commercial C6									
ITEM									
Net Site Area		3.00		£30,945.603 per ha					
Yield		750.00		Private 450.00 Affordable 300.00					
									
1.0 Development Value									
1.1	Private Units		No. of units	Size sq.m	Total sq.m	Epam	Total Value		
	Phase 1 pre sales	Flats -	112.50	64	7,172	£8,025	£57,554,297		
	Phase 1	Flats -	112.50	64	7,172	£8,025	£57,554,297		
	Phase 2 pre sales	Flats -	112.50	64	7,172	£8,025	£57,554,297		
	Phase 2	Flats -	112.50	64	7,172	£8,025	£57,554,297		
			450.00		28688				
1.2	Affordable rent		No. of units	Size sq.m	Total sq.m	Epam	Total Value		
	Phase 1	Flats -	45.00	64	2,869	£2,615	£7,501,781		
	Phase 2	Flats -	45.00	64	2,869	£2,615	£7,501,781		
			90.00		5738				
1.3	Intermediate		No. of units	Size sq.m	Total sq.m	Epam	Total Value		
	Phase 1	Flats -	105.00	64	6,694	£2,945	£19,713,094		
	Phase 2	Flats -	105.00	64	6,694	£2,945	£19,713,094		
			210.00		13388				
1.4	Commercial units		No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value	
			1.00	6375	6,375	£250	7%	£23,611,111	
					No. of months	Rent free period		Adjusted for rent free	
					12			£22,118,136.87	
					Less stamp duty and tax		4.00%		Net capital value
									£21,233,411
1.5	Commercial units		No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value	
			1.00	6375	6,375	£250	7%	£23,611,111	
					No. of months	Rent free period		Adjusted for rent free	
					12			£22,118,136.87	
					Less stamp duty and tax		4.00%		Net capital value
									£21,233,411
Gross Development value			750.00				£327,113,760		
2.0 Development Cost									
2.1 Site Acquisition									
2.1.1	Site value (residual land value)							£97,706,116	
					Less stamp duty and tax		4.00%		
					Agents fee		1.00%		
					Legal fee		£25,000		
							£92,845,810		
2.3 Build Costs									
2.3.1	Private units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs		
	Phase 1	Flats -	450.00	75	33,750	£1,801	£60,763,750		
	Phase 2	Flats -	0.00	0	0	£1,187	£0.00		
			450.00		33750				
2.3.2	Affordable units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs		
	Phase 1	Flats -	300.00	75	22,500	£1,801	£40,522,500		
	Phase 2	Flats -	0.00	0	0	£1,187	£0.00		
			300.00		22500				
2.3.3	Commercial units		No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs		
			1.00	15000	15,000	£1,659	£23,885,000		
750.00			71,250				£124,691,250		
2.4 Construction Costs									
2.4.1	external works as a percentage of build costs			5%				£6,234,563	
							£6,234,563		
2.5 Professional Fees									
2.5.1	as percentage of build costs and construction costs			10%				£13,092,581	
							£13,092,581		
2.6 Contingency									
2.6.1	as percentage of build costs and construction costs			5%				£6,546,290.63	
							£6,546,291		
2.7 Developer contributions									
2.7.1	S.106 Obligations			£1,000 per unit				£450,000	
2.7.2	Mayor CIL			£50 per unit				£3,562,500	
2.7.3	H&F Residential CIL			£0 per sq m				£0	
2.7.4	H&F Commercial CIL			£0 per flat				£0	
2.7.5	Lifetime homes			£0 per unit				£0	
							£4,012,500		
2.8 Sale cost									
Residential									
2.8.1	Sale agents fee			1.25%				£2,877,715	
2.8.2	Sale legal fee			£500				£375,000	
2.8.3	Marketing			£1,000				£450,000	
Commercial phase 1									
2.8.4	Sale agents fee			1.25%				£295,139	
2.8.5	Sale legal fee			1.25%				£295,139	
2.8.6	Letting agent fee			10.00%				£159,375	
2.8.7	Letting legal fee			5.00%				£79,688	
2.8.8	Marketing			4%				£63,750	
Commercial phase 2									
2.8.9	Sale agents fee			1.25%				£295,139	
2.8.10	Sale legal fee			1.25%				£295,139	
2.8.11	Letting agent fee			10.00%				£159,375	
2.8.12	Letting legal fee			5.00%				£79,688	
2.8.13	Marketing			4%				£63,750	
							£5,488,895		
TOTAL DEVELOPMENT COSTS (excluding land)							£160,066,080		
TOTAL DEVELOPMENT COSTS (including land)							£257,772,196		
3.0 Developers' Profit									
3.1	Developer return calculated as a percentage of total development costs			Rate 20%				£51,554,439.20	
							£51,554,439		
TOTAL PROJECT COSTS (EXCLUDING INTEREST)							£309,326,635		
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)							£17,787,125		
4.00 Finance Costs									
				APR 7.00%		PCM 0.566%		£-17,787,125	
TOTAL PROJECT COSTS (INCLUDING INTEREST)							£327,113,760		

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ITEM		Private		Affordable				
Net Site Area		450.00		300.00				
		750.00						
<p>Flats - Mixed - 750 resi & 12,750 sq m commercial S6</p> <p>ITEM</p> <p>Net Site Area <input type="text" value="3.00"/> <input type="text" value="£53,765,617 per ha"/></p> <p>Yield <input type="text" value="750.00"/></p>								
								
1.0 Development Value								
1.1	Private Units	No. of units	Size sq.m	Total sq.m	Epem	Total Value		
	Phase 1 pre sales Flats -	112.50	64	7,172	£11,385	<input type="text" value="£81,651,797"/>		
	Phase 1 Flats -	112.50	64	7,172	£11,385	<input type="text" value="£81,651,797"/>		
	Phase 2 pre sales Flats -	112.50	64	7,172	£11,385	<input type="text" value="£81,651,797"/>		
	Phase 2 Flats -	112.50	64	7,172	£11,385	<input type="text" value="£81,651,797"/>		
		450.00		28,688				
1.2	Affordable rent	No. of units	Size sq.m	Total sq.m	Epem	Total Value		
	Phase 1 Flats -	45.00	64	2,869	£2,685	<input type="text" value="£7,702,594"/>		
	Phase 2 Flats -	45.00	64	2,869	£2,685	<input type="text" value="£7,702,594"/>		
		90.00		5,738				
1.3	Intermediate	No. of units	Size sq.m	Total sq.m	Epem	Total Value		
	Phase 1 Flats -	105.00	64	6,694	£3,300	<input type="text" value="£22,089,375"/>		
	Phase 2 Flats -	105.00	64	6,694	£3,300	<input type="text" value="£22,089,375"/>		
		210.00		13,388				
1.4	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value	
		1.00	6375	6,375	£220	7%	<input type="text" value="£20,777,778"/>	
				No. of months		Rent free period	Adjusted for rent free	
						12	<input type="text" value="£19,463,960.45"/>	
				Less stamp duty and tax		4.00%	Net capital value	
							<input type="text" value="£18,685,402"/>	
1.5	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value	
		1.00	6375	6,375	£220	7%	<input type="text" value="£20,777,778"/>	
				No. of months		Rent free period	Adjusted for rent free	
						12	<input type="text" value="£19,463,960.45"/>	
				Less stamp duty and tax		4.00%	Net capital value	
							<input type="text" value="£18,685,402"/>	
Gross Development value		750.00				£423,561,929		
2.0 Development Cost								
2.1 Site Acquisition								
2.1.1	Site value (residual land value)						<input type="text" value="£169,759,843"/>	
				Less stamp duty and tax		4.00%		
				Agents fee		1.00%		
				Legal fee		£25,000		
							<input type="text" value="£161,296,851"/>	
2.3 Build Costs								
2.3.1	Private units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs		
	Phase 1 pre sales Flats -	450.00	75	33,750	£1,801	<input type="text" value="£60,783,750.00"/>		
	Phase 1 Flats -	0.00	0	0	£1,187	<input type="text" value="£0.00"/>		
		450.00		33750				
2.3.2	Affordable units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs		
	Phase 1 Flats -	300.00	75	22,500	£1,801	<input type="text" value="£40,522,500.00"/>		
	Phase 2 Flats -	0.00	0	0	£1,187	<input type="text" value="£0.00"/>		
		300.00		22500				
2.3.3	Commercial units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs		
		1.00	15000	15,000	£1,559	<input type="text" value="£23,385,000.00"/>		
		750.00		71,250		£124,691,250		
2.4 Construction Costs								
2.4.1	external works as a percentage of build costs	<input type="text" value="5%"/>		<input type="text" value="£6,234,562.50"/>				
							<input type="text" value="£6,234,563"/>	
2.5 Professional Fees								
2.5.1	as percentage of build costs and construction costs	<input type="text" value="10%"/>		<input type="text" value="£13,092,581"/>				
							<input type="text" value="£13,092,581"/>	
2.6 Contingency								
2.6.1	as percentage of build costs and construction costs	<input type="text" value="5%"/>		<input type="text" value="£5,546,291"/>				
							<input type="text" value="£5,546,291"/>	
2.7 Developer contributions								
2.7.1	S.106 Obligations	<input type="text" value="£1,000"/> per unit		<input type="text" value="£450,000"/>				
2.7.2	Mayor CIL	<input type="text" value="£50"/> per unit		<input type="text" value="£3,662,500"/>				
2.7.3	H&F Residential CIL	<input type="text" value="£0"/> per sq m		<input type="text" value="£0"/>				
2.7.4	H&F Commercial CIL	<input type="text" value="£0"/> per flat		<input type="text" value="£0"/>				
2.7.5	Lifetime homes	<input type="text" value="£0"/> per unit		<input type="text" value="£0"/>				
							<input type="text" value="£4,012,500"/>	
2.8 Sale cost								
Residential								
2.8.1	Sale agents fee	<input type="text" value="1.25%"/>		<input type="text" value="£4,082,590"/>				
2.8.2	Sale legal fee	<input type="text" value="£500"/>		<input type="text" value="£375,000"/>				
2.8.3	Marketing	<input type="text" value="£1,000"/>		<input type="text" value="£450,000"/>				
Commercial phase 1								
2.8.4	Sale agents fee	<input type="text" value="1.25%"/>		<input type="text" value="£259,722"/>				
2.8.5	Sale legal fee	<input type="text" value="1.25%"/>		<input type="text" value="£259,722"/>				
2.8.6	Letting agent fee	<input type="text" value="10.00%"/>		<input type="text" value="£140,250"/>				
2.8.7	Letting legal fee	<input type="text" value="5.00%"/>		<input type="text" value="£70,125"/>				
2.8.8	Marketing	<input type="text" value="4%"/>		<input type="text" value="£56,100"/>				
Commercial phase 2								
2.8.9	Sale agents fee	<input type="text" value="1.25%"/>		<input type="text" value="£259,722"/>				
2.8.10	Sale legal fee	<input type="text" value="1.25%"/>		<input type="text" value="£259,722"/>				
2.8.11	Letting agent fee	<input type="text" value="10.00%"/>		<input type="text" value="£140,250"/>				
2.8.12	Letting legal fee	<input type="text" value="5.00%"/>		<input type="text" value="£70,125"/>				
2.8.13	Marketing	<input type="text" value="4%"/>		<input type="text" value="£56,100"/>				
							<input type="text" value="£6,479,429"/>	
TOTAL DEVELOPMENT COSTS (excluding land)							£161,056,613	
TOTAL DEVELOPMENT COSTS (including land)							£330,816,456	
3.0 Developers' Profit								
3.1	Developer return calculated as a percentage of total development costs	<input type="text" value="Rate 20%"/>		<input type="text" value="£66,163,291.28"/>				
							<input type="text" value="£66,163,291"/>	
TOTAL PROJECT COSTS (EXCLUDING INTEREST)							£396,979,748	
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)							£26,582,181	
4.0 Finance Costs								
		<input type="text" value="APR 7.00%"/>		<input type="text" value="PCM 0.565%"/>		<input type="text" value="£26,582,181"/>		
TOTAL PROJECT COSTS (INCLUDING INTEREST)							£423,561,929	

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ECWK

ITEM



Net Site Area	32.60		£15,302,860 per ha				
Yield	8,000		Private	59%	Affordable	41%	
			4,720		3,280		
1.0 Development Value							
1.1	Resi LBHF - Private			No. of units	Size sq.m	Total sq.m	£psm
	Phase 1 pre-sales	Flats -		1,080	70	75,600	£11,000
	Phase 1	Flats -		1,080	70	75,600	£11,000
	Phase 2 pre-sales	Flats -		1,080	70	75,600	£11,000
	Phase 2	Flats -		1,080	70	75,600	£11,000
				4,320		302,400	
							Total Value
							£831,600,000
							£831,600,000
							£831,600,000
							£831,600,000
							£831,600,000
1.2	Resi LBHF - Affordable rent		34.91%	No. of units	Size sq.m	Total sq.m	£psm
	Phase 1	Flats -		573	70	40,075	£2,260
	Phase 2	Flats -		573	70	40,075	£2,260
				1,145		80,150	
							Total Value
							£90,569,500
							£90,569,500
1.3	Resi LBHF - Intermediate		34.91%	No. of units	Size sq.m	Total sq.m	£psm
	Phase 1	Flats -		573	70	40,075	£2,260
	Phase 2	Flats -		573	70	40,075	£2,260
				1,145		80,150	
							Total Value
							£90,569,500
							£90,569,500
1.4	LBHF Replacement social rent		17.99%	No. of units	Size sq.m	Total sq.m	£psm
	Phase 1	Flats -		295	70	20,650	£2,260
	Phase 2	Flats -		295	70	20,650	£2,260
				590		41,300	
							Total Value
							£46,669,000
							£46,669,000
1.5	Resi RBKC - Private ECWK			No. of units	Size sq.m	Total sq.m	£psm
	Phase 1 pre-sales	Flats -		100	70	7,000	£13,500
	Phase 1	Flats -		100	70	7,000	£13,500
	Phase 2 pre-sales	Flats -		100	70	7,000	£13,500
	Phase 2	Flats -		100	70	7,000	£13,500
				400		28,000	
							Total Value
							£94,500,000
							£94,500,000
							£94,500,000
							£94,500,000
							£94,500,000
1.6	Resi RBKC - Affordable rent ECWK		0.91%	No. of units	Size sq.m	Total sq.m	£psm
	Phase 1	Flats -		15	70	1,050	£2,500
	Phase 2	Flats -		15	70	1,050	£2,500
				30		2,100	
							Total Value
							£2,625,000
							£2,625,000
1.7	Resi RBKC - Intermediate ECWK		0.91%	No. of units	Size sq.m	Total sq.m	£psm
	Phase 1	Flats -		15	70	1,050	£2,500
	Phase 2	Flats -		15	70	1,050	£2,500
				30		2,100	
							Total Value
							£2,625,000
							£2,625,000
1.8	RBKC Social rented		10.37%	No. of units	Size sq.m	Total sq.m	£psm
	Phase 1	Flats -		170	70	11,900	£2,500
	Phase 2	Flats -		170	70	11,900	£2,500
				340		23,800	
							Total Value
							£29,750,000
							£29,750,000
1.9	Ground rents			No. of units			Rent
				4,720			£400
							Yield
							6%
							Capital Value
							£31,466,667
							Less stamp duty land tax
							4.00%
							Net capital value
							£30,208,000
1.10	Commercial units mixed			No. of units	Size sq.m	Total unit size	Rent
				1.00	227,619	227,619	£220
							Yield
							6.75%
							Capital Value
							£741,869,170
							Rent free period (months)
							12
							Adjusted for rent free
							£694,959,410.18
							Less stamp duty land tax
							4.00%
							Net capital value
							£667,161,034
	Development value			8000.00			£4,927,385,034
2.0 Development Cost							
2.1	Site Acquisition						
2.1.1	Site value (residual land value)						£525,103,405
							Less stamp duty and tax
							4.00%
							Agents fee
							1.00%
							Legal fee
							£25,000
							£498,873,235
2.3	Build Costs						
2.3.1	Resi LBHF - Private			No. of units	Size sq.m	Total sq.m	Cost per sq.m
				4,320	86	371,520	£2,379
							Total Costs
							£883,846,080
2.3.2	Resi RBKC - Private ECWK			No. of units	Size sq.m	Total sq.m	Cost per sq.m
				400	86	34,400	£3,283
				400		34,400	
							Total Costs
							£112,935,200
2.3.3	Resi LBHF - Affordable rent & Resi RBKC - Affordable rent ECWK Resi LBHF - Intermediate & Resi RBKC - Intermediate ECWK			No. of units	Size sq.m	Total sq.m	Cost per sq.m
				1,175	86	101,050	£1,475
				1,175	86	101,050	£1,647
				2,350		202,100	
							Total Costs
							£149,048,750
							£166,429,350
2.3.4	LBHF Replacement social rent RBKC Social rented			No. of units	Size sq.m	Total sq.m	Cost per sq.m
				590	86	50,740	£1,475
				340	86	29,240	£1,475
				930		79,980	
							Total Costs
							£74,841,500
							£43,129,000
2.3.5	Commercial units mixed			No. of units	Size sq.m	Total sq.m	Cost per sq.m
				1.00	267,787	267,787	£1,881
							Total Costs
							£503,670,671
				8,000		955,787	£1,933,900,551
2.4	Site abnormals & Infrastructure costs						
2.4.1	Site Preparation and Infrastructure			£601,656	per ha		£19,614,000
2.4.2	Infrastructure & abnormals			£18,543,650	per ha		£604,522,990
							£624,136,990
2.5	Professional Fees						
2.5.1	as percentage of build costs and construction costs			10%			£255,803,754.07
							£255,803,754
2.6	Contingency						
2.6.1	as percentage of build costs and construction costs			5%			£127,901,877.03
							£127,901,877
2.7	Developer contributions						
2.7.1	Section 106 Obligations			£0	per unit		£0
2.7.2	Mayor CIL			£50	per sq m		£33,685,350
2.7.3	H&F Residential CIL			£0	per sq m		£0
2.7.4	H&F Mixed commercial CIL			£0	per sq m		£0

2.8 Sale cost			£33,685,350
Residential			
2.8.1	Sale agents fee	1.25%	£41,580,000
2.8.2	Sale legal fee	£500	£4,000,000
2.8.3	Marketing	£1,000 per private unit	£4,720,000
Commercial phase 1			
2.8.4	Sale agents fee	1.25% of Gross first year rent	£4,833,349
2.8.5	Sale legal fee	1.25% of Gross first year rent	£4,833,349
2.8.6	Marketing	4% of Gross first year rent	£1,001,523
2.8.7	Letting agents fee	10% of Gross first year rent	£2,503,808
2.8.8	Letting legal fee	5% of Gross first year rent	£1,251,904
Commercial phase 2			
2.8.9	Sale agents fee	1.25% of Gross first year rent	£4,833,349
2.8.10	Sale legal fee	1.25% of Gross first year rent	£4,833,349
2.8.11	Marketing	4% of Gross first year rent	£1,001,523
2.8.12	Letting agents fee	10% of Gross first year rent	£2,503,808
2.8.13	Letting legal fee	5% of Gross first year rent	£1,251,904
			£79,147,868
TOTAL DEVELOPMENT COSTS (excluding land)			£3,054,576,390
TOTAL DEVELOPMENT COSTS (including land)			£3,579,679,795
3.0 Developers' Profit			
3.1	Developer return calculated as a percentage of total development costs	Rate 20%	£715,935,959.05
			£715,935,959
TOTAL PROJECT COSTS (EXCLUDING INTEREST)			£4,295,615,754
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)			£631,769,279
4.00	Finance Costs	APR 7.00%	PCM 0.565% -£631,769,279
TOTAL PROJECT COSTS (INCLUDING INTEREST)			£4,927,385,034

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Flats - 100.0 Units WC1							
ITEM							
Net Site Area		0.50		£19,538,179 per ha			
Yield		100.00		Private 60.00 Affordable 40.00			
1.0 Development Value							
1.1	Private Units	No. of units	Size sq.m	Total sq.m	Epsm	Total Value	
	Phase 1 Flats -	60.00	64	3,825	£7,630	£29,184,750	
	Phase 2 Flats -	0.00	64	0	£7,630	£0	
		60.00		3,825			
1.2	Social rent	No. of units	Size sq.m	Total sq.m	Epsm	Total Value	
	Phase 1 Flats -	25.00	64	1,594	£1,733	£2,765,969	
	Phase 2 Flats -	0.00	64	0	£1,733	£0	
		25.00		1,594			
1.3	Intermediate	No. of units	Size sq.m	Total sq.m	Epsm	Total Value	
	Phase 1 Flats -	15.00	64	956	£2,699	£2,580,919	
	Phase 2 Flats -	0.00	64	0	£2,699	£0	
		15.00		956			
1.4	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		0.00	0	0	£0	0%	£0
					No. of months	Rent free period	Adjusted for rent free
						0	£0.00
					Less stamp duty and tax		0.00%
							Net capital value
							£0
1.5	Commercial units	No. of units	Size sq.m	Total unit size	Rent	Yield	Capital Value
		0.00	0	0	£0	0%	£0
					No. of months	Rent free period	Adjusted for rent free
						0	£0.00
					Less stamp duty and tax		0.00%
							Net capital value
							£0
Gross Development value		100.00				£34,527,638	
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)					£10,256,936	
				Less stamp duty and tax			
				Agents fee		4.00%	
				Legal fee		1.00%	
						£25,000	
						£9,769,099	
2.3 Build Costs							
2.3.1	Private units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Phase 1 Flats -	60.00	75	4,500	£1,801	£8,105,500	
	Phase 2 Flats -	0.00	0	0	£0	£0.00	
		60.00		4,500			
2.3.2	Affordable units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
	Phase 1 Flats -	40.00	75	3,000	£1,801	£5,403,000	
	Phase 2 Flats -	0.00	0	0	£0	£0.00	
		40.00		3,000			
2.3.3	Commercial units	No. of units	Size sq.m	Total sq.m	Cost per sq.m	Total Costs	
		0.00	0	0	£1,559	£0.00	
		100.00		7,500		£13,507,500	
2.4 Construction Costs							
2.4.1	external works as a percentage of build costs	5%				£675,375.00	
						£675,375	
2.5 Professional Fees							
2.5.1	as percentage of build costs and construction costs	10%		155.9		£1,418,288	
						£1,418,288	
2.6 Contingency							
2.6.1	as percentage of build costs and construction costs	5%		77.95 £1,793		£709,143.75	
						£709,144	
2.7 Developer contributions							
2.7.1	S.106 Obligations	£1,000 per sq m				£60,000	
2.7.2	Mayor CIL	£50 per sq m				£225,000	
2.7.3	H&F Residential CIL	£0 per sq m				£0	
2.7.4	H&F Commercial CIL	£0 per sqm				£0	
2.7.5	Lifetime homes	£0 per unit				£0	
						£285,000	
2.8 Sale cost							
Residential							
2.8.1	Sale agents fee	1.25%				£384,809	
2.8.2	Sale legal fee	£500				£50,000	
2.8.3	Marketing	£1,000				£60,000	
Commercial phase 1							
2.8.4	Marketing	4% of Gross first year rent				£0	
2.8.5	Sale agents fee	1.25%				£0	
2.8.6	Sale legal fee	1.25%				£0	
2.8.7	Letting agent fee	10.00%				£0	
2.8.8	Letting legal fee	5.00%				£0	
Commercial phase 2							
2.8.9	Marketing	4% of Gross first year rent				£0	
2.8.10	Sale agents fee	1.25%				£0	
2.8.11	Sale legal fee	1.25%				£0	
2.8.12	Letting agent fee	10.00%				£0	
2.8.13	Letting legal fee	5.00%				£0	
						£474,809	
TOTAL DEVELOPMENT COSTS (excluding land)						£17,070,116	
TOTAL DEVELOPMENT COSTS (including land)						£27,327,052	
3.0 Developers' Profit							
3.1	Developer return calculated as a percentage of total development costs	Rate 20%				£5,465,410.41	
						£5,465,410	
TOTAL PROJECT COSTS (EXCLUDING INTEREST)						£32,792,462	
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)						£1,735,175	
4.00 Finance Costs							
		APR 7.00%		PCM 0.565%		-£1,735,175	
TOTAL PROJECT COSTS (INCLUDING INTEREST)						£34,527,638	

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Flats - 100.0 Units WC2	
ITEM	
Net Site Area	0.33 <input type="text"/> £29,307,269 per ha <input type="text"/>
Yield	Private 100.00 <input type="text"/> 60.00 <input type="text"/> Affordable 40.00 <input type="text"/>
1.0 Development Value	
1.1 Private Units	No. of units 60.00 Size sq.m 64 Total sq.m 3,825 Epsm £7,630 Total Value £29,184,750
Phase 1 Flats -	60.00 64 3,825 £7,630 £29,184,750
Phase 2 Flats -	0.00 0 0 0 0
1.2 Social rent	No. of units 25.00 Size sq.m 64 Total sq.m 1,594 Epsm £1,733 Total Value £2,761,969
Phase 1 Flats -	25.00 64 1,594 £1,733 £2,761,969
Phase 2 Flats -	0.00 0 0 0 0
1.3 Intermediate	No. of units 15.00 Size sq.m 64 Total sq.m 956 Epsm £2,699 Total Value £2,580,919
Phase 1 Flats -	15.00 64 956 £2,699 £2,580,919
Phase 2 Flats -	0.00 0 0 0 0
1.4 Commercial units	No. of units 0.00 Size sq.m 0 Total unit size 0 Rent £250 Yield 0% Capital Value £0
	No. of months Rent free period 0 Adjusted for rent free £0.00
	Less stamp duty and tax 0.00% Net capital value £0
1.5 Commercial units	No. of units 0.00 Size sq.m 0 Total unit size 0 Rent £250 Yield 0% Capital Value £0
	No. of months Rent free period 0 Adjusted for rent free £0.00
	Less stamp duty and tax 0.00% Net capital value £0
Gross Development value £34,527,638	
2.0 Development Cost	
2.1 Site Acquisition	
2.1.1 Site value (residual land value)	£10,256,936
	Less stamp duty and tax 4.00%
	Agents fee 1.00%
	Legal fee £25,000
£9,789,090	
2.3 Build Costs	
2.3.1 Private units	No. of units 60.00 Size sq.m 75 Total sq.m 4,500 Cost per sq.m £1,801 Total Costs £8,104,500.00
Flats -	60.00 75 4,500 £1,801 £8,104,500.00
Flats -	0.00 0 0 0 0
	60.00 4500
2.3.2 Affordable units	No. of units 40.00 Size sq.m 75 Total sq.m 3,000 Cost per sq.m £1,801 Total Costs £5,403,000.00
Flats -	40.00 75 3,000 £1,801 £5,403,000.00
Flats -	0.00 0 0 0 0
	40.00 3000
2.3.3 Commercial units	No. of units 0.00 Size sq.m 0 Total sq.m 0 Cost per sq.m £1,659 Total Costs £0.00
	0.00 0 0 0 0
100.00 7,500 £13,507,500	
2.4 Construction Costs	
2.4.1 external works as a percentage of build costs	5% £675,375.00
£675,375	
2.5 Professional Fees	
2.5.1 as percentage of build costs and construction costs	10% £1,418,288
£1,418,288	
2.6 Contingency	
2.6.1 as percentage of build costs and construction costs	5% £709,143.75
£709,144	
2.7 Developer contributions	
2.7.1 S.106 Obligations	£1,000 per sq m £60,000
2.7.2 Mayor CIL	£50 per sq m £225,000
2.7.3 H&F Residential CIL	£0 per sq m £0
2.7.4 H&F Commercial CIL	£0 per sqm £0
2.7.5 Lifetime homes	£0 per unit £0
£285,000	
2.8 Sale cost	
Residential	
2.8.1 Sale agents fee	1.25% £384,809
2.8.2 Sale legal fee	£500 £50,000
2.8.3 Marketing	£1,000 £60,000
Commercial phase 1	
2.8.4 Marketing	4% of Gross first year rent £0
2.8.5 Sale agents fee	1.25% £0
2.8.6 Sale legal fee	1.25% £0
2.8.7 Letting agent fee	10.00% £0
2.8.8 Letting legal fee	5.00% £0
Commercial phase 2	
2.8.9 Marketing	4% of Gross first year rent £0
2.8.10 Sale agents fee	1.25% £0
2.8.11 Sale legal fee	1.25% £0
2.8.12 Letting agent fee	10.00% £0
2.8.13 Letting legal fee	5.00% £0
£474,809	
TOTAL DEVELOPMENT COSTS (excluding land) £17,070,116	
TOTAL DEVELOPMENT COSTS (including land) £27,327,052	
3.0 Developers' Profit	
3.1 Developer return calculated as a percentage of total development costs	Rate 20% £5,465,410.41
£5,465,410	
TOTAL PROJECT COSTS (EXCLUDING INTEREST) £32,792,462	
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST) £1,735,175	
4.00 Finance Costs	APR 7.00% <input type="text"/> PCM 0.565% <input type="text"/> -£1,735,175 <input type="text"/>
TOTAL PROJECT COSTS (INCLUDING INTEREST) £34,527,638	

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Flats - 500.0 Units WC3	
ITEM	
Net Site Area	3.00 <input type="text"/> £17,525,362 per ha <input type="text"/>
Yield	500.00 <input type="text"/> Private 300.00 Affordable 200.00
1.0 Development Value	
1.1 Private Units	No. of units 75.00 Size sq.m 64 Total sq.m 4,781 Epem £7,630 Total Value £36,480,938
Phase 1 pre-sales Flats -	75.00 64 4,781 £7,630 £36,480,938
Phase 1 Flats -	75.00 64 4,781 £7,630 £36,480,938
Phase 2 pre-sales Flats -	75.00 64 4,781 £7,630 £36,480,938
Phase 2 Flats -	75.00 64 4,781 £7,630 £36,480,938
	300.00 19125
1.2 Social rent	No. of units 62.50 Size sq.m 64 Total sq.m 3,984 Epem £1,733 Total Value £6,904,922
Phase 1 Flats -	62.50 64 3,984 £1,733 £6,904,922
Phase 2 Flats -	62.50 64 3,984 £1,733 £6,904,922
	125.00 7969
1.3 Intermediate	No. of units 37.50 Size sq.m 64 Total sq.m 2,391 Epem £2,699 Total Value £6,452,297
Phase 1 Flats -	37.50 64 2,391 £2,699 £6,452,297
Phase 2 Flats -	37.50 64 2,391 £2,699 £6,452,297
	75.00 4781
1.4 Commercial units	No. of units 1.00 Size sq.m 4250 Total unit size 4,250 Rent £250 Yield 7% Capital Value £15,740,741
	No. of months 12 Rent free period Adjusted for rent free £14,745,424.58
	Less stamp duty land tax 4.00% Net capital value £14,155,608
1.5 Commercial units	No. of units 1.00 Size sq.m 4250 Total unit size 4,250 Rent £250 Yield 7% Capital Value £15,740,741
	No. of months 12 Rent free period Adjusted for rent free £14,745,424.58
	Less stamp duty land tax 4.00% Net capital value £14,155,608
Gross Development value 500.00 £200,949,403	
2.0 Development Cost	
2.1 Site Acquisition	
2.1.1 Site value (residual land value)	£55,316,931
	Less stamp duty and tax 4.00% Agents fee 1.00% Legal fee £25,000
	£52,576,085
2.3 Build Costs	
2.3.1 Private units	No. of units 300 Size sq.m 75 Total sq.m 22,500 Cost per sq.m £1,801 Total Costs £40,522,500.00
Flats -	0 0 0 £0 £0.00
Flats -	300 0 22500
2.3.2 Affordable units	No. of units 200 Size sq.m 75 Total sq.m 15,000 Cost per sq.m £1,801 Total Costs £27,015,000.00
Flats -	0 0 0 £0 £0.00
Flats -	200 0 15000
2.3.3 Commercial units	No. of units 1.00 Size sq.m 10000 Total sq.m 10,000 Cost per sq.m £1,659 Total Costs £15,550,000.00
	500 47,500 £83,127,500
2.4 Construction Costs	
2.4.1 external works as a percentage of build costs	5% £4,156,375.00
	£4,156,375
2.5 Professional Fees	
2.5.1 as percentage of build costs and construction costs	10% £8,728,388
	£8,728,388
2.6 Contingency	
2.6.1 as percentage of build costs and construction costs	5% £4,364,193.75
	£4,364,194
2.7 Developer contributions	
2.7.1 S.106 Obligations	£1,000 per sq m £300,000
2.7.2 Mayor CIL	£50 per sq m £1,625,000
2.7.3 H&F Residential CIL	£0 per sq m £0
2.7.4 H&F Commercial CIL	£0 per sqm £0
2.7.5 Lifetime homes	£0 per unit £0
	£1,925,000
2.8 Sale cost	
Residential	
2.8.1 Sale agents fee	1.25% £1,368,035
2.8.2 Sale legal fee	£500 £250,000
2.8.3 Marketing	£1,000 £300,000
Commercial phase 1	
2.8.4 Marketing	4% of Gross first year rent £42,500
2.8.5 Sale agents fee	1.25% £196,759
2.8.6 Sale legal fee	1.25% £196,759
2.8.7 Letting agent fee	10.00% £106,250
2.8.8 Letting legal fee	5.00% £53,125
Commercial phase 2	
2.8.9 Marketing	4% of Gross first year rent £42,500
2.8.10 Sale agents fee	1.25% £196,759
2.8.11 Sale legal fee	1.25% £196,759
2.8.12 Letting agent fee	10.00% £106,250
2.8.13 Letting legal fee	5.00% £53,125
	£3,108,822
TOTAL DEVELOPMENT COSTS (excluding land) £105,410,278	
TOTAL DEVELOPMENT COSTS (including land) £160,727,210	
3.0 Developers' Profit	
3.1 Developer return calculated as a percentage of total development costs	Rate 20% £32,145,442
	£32,145,442
TOTAL PROJECT COSTS (EXCLUDING INTEREST) £192,872,651	
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST) £8,076,751	
4.00 Finance Costs	APR 7.00% PCM 0.565% -£8,076,751
	TOTAL PROJECT COSTS (INCLUDING INTEREST) £200,949,403

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Flats -		750.0	Units	WC4						
ITEM										
Net Site Area		3.00		£25,223,761 per ha						
Yield		750.00		Private		Affordable				
				450.00		300.00				
1.0 Development Value										
1.1 Private Units		No. of units		Size sq.m		Total sq.m		Epem		Total Value
Phase 1 pre-sales Flats -		112.50		64		7,172		£7,630		£54,721,406
Phase 1 Flats -		112.50		64		7,172		£7,630		£54,721,406
Phase 2 pre-sales Flats -		112.50		64		7,172		£7,630		£54,721,406
Phase 2 Flats -		112.50		64		7,172		£7,630		£54,721,406
		450.00				28688				
1.2 Social rent		No. of units		Size sq.m		Total sq.m		Epem		Total Value
Phase 1 Flats -		93.75		64		5,977		£1,733		£10,357,383
Phase 2 Flats -		93.75		64		5,977		£1,733		£10,357,383
		187.50				11953				
1.3 Intermediate		No. of units		Size sq.m		Total sq.m		Epem		Total Value
Phase 1 Flats -		56.25		64		3,586		£2,699		£9,678,445
Phase 2 Flats -		56.25		64		3,586		£2,699		£9,678,445
		112.50				7172				
1.4 Commercial units										
		No. of units		Size sq.m		Total unit size		Rent		Yield
		1.00		6375		6,375		£250		7%
										Capital Value
										£23,811,111
										Rent free period
										12
										Adjusted for rent free
										£22,118,136.87
										4.00%
										Net capital value
										£21,233,411
1.5 Commercial units		No. of units		Size sq.m		Total unit size		Rent		Yield
		1.00		6375		6,375		£250		7%
										Capital Value
										£23,811,111
										Rent free period
										12
										Adjusted for rent free
										£22,118,136.87
										4.00%
										Net capital value
										£21,233,411
Gross Development value		750.00								£301,424,104
2.0 Development Cost										
2.1 Site Acquisition										
2.1.1 Site value (residual land value)										£79,827,667
										Less stamp duty and tax
										4.00%
										1.00%
										Agents fee
										£25,000
										Legal fee
										£25,000
										£75,671,283
2.3 Build Costs										
2.3.1 Private units		No. of units		Size sq.m		Total sq.m		Cost per sq.m		Total Costs
Flats -		450.00		75		33,750		£1,801		£60,783,750.00
Flats -		0.00		92		0		£0		£0.00
		450.00				33750				
2.3.2 Affordable units		No. of units		Size sq.m		Total sq.m		Cost per sq.m		Total Costs
Flats -		300.00		75		22,500		£1,801		£40,522,500.00
Flats -		0.00		0		0		£0		£0.00
		300.00				22500				
2.3.3 Commercial units		No. of units		Size sq.m		Total sq.m		Cost per sq.m		Total Costs
		1.00		15000		15,000		£1,659		£23,885,000.00
		750.00				71,250				£124,691,250
2.4 Construction Costs										
2.4.1 external works as a percentage of build costs				5%						£6,234,562.50
										£6,234,563
2.5 Professional Fees										
2.5.1 as percentage of build costs and construction costs				10%						£13,092,581
										£13,092,581
2.6 Contingency										
2.6.1 as percentage of build costs and construction costs				5%						£6,546,291.63
										£6,546,291
2.7 Developer contributions										
2.7.1 S.106 Obligations				£1,000		per sq m				£450,000
2.7.2 Mayor CIL				£50		per sq m				£2,437,500
2.7.3 H&F Residential CIL				£0		per sq m				£0
2.7.4 H&F Commercial CIL				£0		per sqm				£0
2.7.5 Lifetime homes				£0		per unit				£0
										£2,887,500
2.8 Sale cost										
Residential										
2.8.1 Sale agents fee				1.25%						£2,736,070
2.8.2 Sale legal fee				£500						£375,000
2.8.3 Marketing				£1,000						£450,000
Commercial phase 1										
2.8.4 Marketing				4%		of Gross first year rent				£83,750
2.8.5 Sale agents fee				1.25%						£295,139
2.8.6 Sale legal fee				1.25%						£295,139
2.8.7 Letting agent fee				10.00%						£159,375
Commercial phase 2										
2.8.8 Letting legal fee				5.00%						£79,688
2.8.9 Marketing				4%		of Gross first year rent				£83,750
2.8.10 Sale agents fee				1.25%						£295,139
2.8.11 Sale legal fee				1.25%						£295,139
2.8.12 Letting agent fee				10.00%						£159,375
2.8.13 Letting legal fee				5.00%						£79,688
										£5,347,251
TOTAL DEVELOPMENT COSTS (excluding land)										£158,799,435
TOTAL DEVELOPMENT COSTS (including land)										£238,427,162
3.0 Developers' Profit										
3.1 Developer return calculated as a percentage of total development costs				Rate		20%				£47,685,420.37
										£47,685,420
TOTAL PROJECT COSTS (EXCLUDING INTEREST)										£286,112,522
TOTAL INCOME - TOTAL COSTS (EXCLUDING INTEREST)										£15,311,582
4.0 Finance Costs										
		APR		7.00%		FCM		0.565%		-£15,311,582
										£301,424,104




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Ex HTC offices									
ITEM									
Net Site Area	0.25	Residual value	£2,897,458.13 per ha						
1.0 Development Value									
1.1	Ex HTC offices	No. of units	Size sq.m	Rent	Yield	Value per unit	Capital Value		
		1	3948	£250	7.0%	£14,100,893	£14,100,893		
					No. of months	Rent free period	Adjusted for rent free		
						12	£13,178,405		
							4.00%		
Total development value							£12,651,268		
2.0 Development Cost									
2.1 Site Acquisition									
2.1.1	Site value (residual land value)						£766,523		
		Less Purchaser Costs					5.50%		
							£724,365		
2.2 Build Costs									
2.2.1	Ex HTC offices	No. of units	Size sq.m	Cost per sq.m				Total Costs	
		1	4,645	£1,559				£7,241,555	
							£7,241,555		
2.3 Externals									
2.3.1	external works as a percentage of build costs	5.0%						£362,078	
2.3.2	Demolition	£0						£0	
							£362,078		
2.4 Professional Fees									
2.4.1	as percentage of build costs & externals	8%						£608,291	
							£608,291		
Total construction costs							£8,211,923		
3.0 Contingency									
3.1	as a percentage of total construction costs	5%						£410,596.17	
							£410,596		
4.0 Sale costs									
4.1	Marketing (offices & industrial)	£15,000						£15,000	
4.2	Letting agent fee	10% of rent						£98,706	
4.3	Letting legal fees (offices)	£20,000 of rent						£20,000	
4.4	Sale agents fee	1.25% Capital value						£176,261	
4.5	Sale legal fees	1.25% Capital value						£176,261	
							£486,229		
5.0 Policy costs									
5.1	Mayor CIL Calculated as a £ psm	£50						£232,250	
5.2	Office CIL Calculated as a £ psm	£0						£0	
							£232,250		
TOTAL DEVELOPMENT COSTS (excluding land payment)							£9,340,998		
TOTAL DEVELOPMENT COSTS (including land payment)							£10,107,521		
6.0 Developers' Profit									
6.1	as percentage of total development costs	Rate						£2,021,504.28	
		20%						£2,021,504	
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£12,129,026		
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£522,243		
7.00 Finance Costs									
		APR		PCM					
		7.00%		0.565%				-£522,243	
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£12,651,268		


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HTC offices							
ITEM							
Net Site Area	0.25	Residual value	£23,920,183.11 per ha				
							
1.0 Development Value							
1.1	HTC offices	No. of units	Size sq.m	Rent	Yield	Value per unit	Capital Value
		1	3948	£425	7.0%	£23,971,518	£23,971,518
					No. of months	Rent free period	Adjusted for rent free
						12	£22,403,287.72
							4.00%
Total development value							£21,507,156
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£6,328,091
			Less Purchaser Costs				5.50%
							£5,980,046
2.2 Build Costs							
2.2.1	HTC offices	No. of units	Size sq.m	Cost per sq.m			Total Costs
		1	4,645	£1,739			£8,077,655
							£8,077,655
2.3 Externals							
2.3.1	external works as a percentage of build costs		5.0%				£403,883
2.3.2	Demolition		£0				£0
							£403,883
2.4 Professional Fees							
2.4.1	as percentage of build costs & externals		8%				£678,523
							£678,523
Total construction costs							£9,160,061
3.0 Contingency							
3.1	as a percentage of total construction costs		5%				£458,003.04
							£458,003
4.0 Sale costs							
4.1	Marketing (offices & industrial)		£15,000				£15,000
4.2	Letting agent fee		10%	of rent			£167,801
4.3	Letting legals (offices)		£20,000	of rent			£20,000
4.4	Sale agents fee		1.25%	Capital value			£299,644
4.5	Sale legal fees		1.25%	Capital value			£299,644
							£802,089
5.0 Policy costs							
5.1	Mayor CIL Calculated as a £ psm		£50				£232,250
5.2	Office CIL Calculated as a £ psm		£0				£0
							£232,250
TOTAL DEVELOPMENT COSTS (excluding land payment)							£10,652,402
TOTAL DEVELOPMENT COSTS (including land payment)							£16,980,493
6.0 Developers' Profit							
6.1	as percentage of total development costs		Rate	20%			£3,396,099
							£3,396,099
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£20,376,592
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£1,130,564
7.00 Finance Costs							
			APR	7.00%	PCM	0.565%	-£1,130,564
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£21,507,156


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All industrial single		BOR1ind					
ITEM							
Net Site Area	0.50	Residual value	£2,924,324.55		per ha		
1.0 Development Value							
1.1	All industrial single	No. of units	Size sq.m	Rent	Yield	Value per unit	Capital Value
		1	3500	£135.00	8.5%	£5,558,824	£5,558,824
					No. of months	Rent free period	Adjusted for rent free
						18	£4,918,563.47
							4.00%
Total development value							£5,336,471
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£1,547,262
			Less Purchaser Costs				5.50%
							£1,462,162
2.2 Build Costs							
2.2.1	All industrial single	No. of units	Size sq.m	Cost per sq.m			Total Costs
		1	3,500	£560			£1,960,000
							£1,960,000
2.3 Externals							
2.3.1	external works as a percentage of build costs		5.0%				£98,000
2.3.2	Demolition		£0				£0
							£98,000
2.4 Professional Fees							
2.4.1	as percentage of build costs & externals		8%				£164,640
							£164,640
Total construction costs							£2,222,640
3.0 Contingency							
3.1	as a percentage of total construction costs		5%				£111,132.00
							£111,132
4.0 Sale costs							
4.1	Marketing (offices & industrial)		£15,000				£15,000
4.2	Letting agent fee		10%	of rent			£47,250
4.3	Letting legals (industrial, and retail)		5%	of rent			£23,625
4.4	Sale agents fee		1.25%	Capital value			£69,485
4.5	Sale legal fees		1.25%	Capital value			£69,485
							£224,846
5.0 Policy costs							
5.1	Mayor CIL Calculated as a £ psm		£50				£175,000
5.2	Industrial CIL Calculated as a £ psm		£0				£0
							£175,000
TOTAL DEVELOPMENT COSTS (excluding land payment)							£2,733,618
TOTAL DEVELOPMENT COSTS (including land payment)							£4,280,879
6.0 Developers' Profit							
6.1	as percentage of total development costs		Rate	20%			£856,176
							£856,176
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£5,137,055
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£199,415
7.00 Finance Costs							
			APR	7.00%	PCM	0.565%	-£199,415
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£5,336,471


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All convenience retail		BORconv					
ITEM							
Net Site Area	0.07	Residual value	£11,812,207.28 per ha				
							
1.0 Development Value							
1.1	All convenience retail	No. of units	Size sq.m	Rent	Yield	Value per unit	Capital Value
		1	442	£250	4.8%	£2,325,000	£2,325,000
					No. of months	Rent free period	Adjusted for rent free
						12	2,219,570
							4.00%
Total development value							£2,130,788
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£874,978
		Less Purchaser Costs					5.50%
							£826,854.51
2.2 Build Costs							
2.2.1	All convenience retail	No. of units	Size sq.m	Cost per sq.m	Total Costs		
		1	465	£1,241	£577,065		
							£577,065
2.3 Externals							
2.3.1	external works as a percentage of build costs	5.0%		£28,853			
2.3.2	Demolition	£0		£0			
							£28,853
2.4 Professional Fees							
2.4.1	as percentage of build costs & externals	8%		£48,473			
							£48,473
Total construction costs							£654,392
3.0 Contingency							
3.1	as a percentage of total construction costs	5%		£32,719.59			
							£32,720
4.0 Sale costs							
4.1	Marketing (comparison retail)	£25,000		£25,000			
4.2	Letting agent fee	10% of rent		£11,044			
4.3	Letting legals (industrial, and retail)	5% of rent		£5,522			
4.4	Sale agents fee	1.25% Capital value		£29,063			
4.5	Sale legal fees	1.25% Capital value		£29,063			
							£99,691
5.0 Policy costs							
5.1	Mayor CIL Calculated as a £ psm	£50		£23,250			
5.2	Convenience retail CIL Calculated as a £ psm	£0		£0			
							£23,250
TOTAL DEVELOPMENT COSTS (excluding land payment)							£810,052
TOTAL DEVELOPMENT COSTS (including land payment)							£1,685,030
6.0 Developers' Profit							
6.1	as percentage of total development costs	Rate		£337,006			
		20%		£337,006			
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£2,022,036
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£108,751
7.00 Finance Costs							
		APR		PCM	-		
		7.00%		0.565%	-£108,751		
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£2,130,788

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All comparison retail		BOR2comp					
ITEM							
Net Site Area	0.07	Residual value	£12,802,616.07 per ha				
							
1.0 Development Value							
1.1	All comparison retail	No. of units	Size sq.m	Rent	Yield	Value per unit	Capital Value
		1	442	350	7.0%	£2,208,750	£2,208,750
					No. of months	Rent free period	Adjusted for rent free
						12	2,064,252
							4.00%
Total development value							£1,981,682
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)						£948,342
		Less Purchaser Costs					5.50%
							£896,183
2.2 Build Costs							
2.2.1	All comparison retail	No. of units	Size sq.m	Cost per sq.m	Total Costs		
		1	465	£898	£417,570		
							£417,570
2.3 Externals							
2.3.1	external works as a percentage of build costs	5.0%					£20,879
2.3.2	Demolition	£0					£0
							£20,879
2.4 Professional Fees							
2.4.1	as percentage of build costs & externals	8%					£35,076
							£35,076
Total construction costs							£473,524
3.0 Contingency							
3.1	as a percentage of total construction costs	5%					£23,676.22
							£23,676
4.0 Sale costs							
4.1	Marketing	£15,000					£15,000
4.2	Letting agent fee	10% of rent					£15,461
4.3	Letting legals (industrial, and retail)	5% of rent					£7,731
4.4	Sale agents fee	1.25% Capital value					£27,609
4.5	Sale legal fees	1.25% Capital value					£27,609
							£93,411
5.0 Policy costs							
5.1	Mayor CIL Calculated as a £ psm	£50					£23,250
5.2	Comparison retail CIL Calculated as a £ psm	£0					£0
							£23,250
TOTAL DEVELOPMENT COSTS (excluding land payment)							£613,861
TOTAL DEVELOPMENT COSTS (including land payment)							£1,562,203
6.0 Developers' Profit							
6.1	as percentage of total development costs	Rate 20%					£312,441
							£312,441
TOTAL PROJECT COSTS [EXCLUDING INTEREST]							£1,874,644
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]							£107,038
7.00 Finance Costs							
		APR	PCM				
		7.00%	0.565%				-£107,038
TOTAL PROJECT COSTS [INCLUDING INTEREST]							£1,981,682

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Hotels (100 bed)		BOR4hot									
ITEM											
Net Site Area	0.25	Residual value	£8,001,512.36		per ha						
1.0 Development Value											
1.1	Hotels (100 bed)	No. of units	100	Rent per bed space	£6,500	Yield	6.0%	Value per unit	£108,333	Capital Value	£10,833,333
						No. of months	Rent free period	0		Adjusted for rent free	£10,833,333
											4.00%
Total development value										£10,400,000	
2.0 Development Cost											
2.1 Site Acquisition											
2.1.1	Site value (residual land value)									£2,116,802	
			Less Purchaser Costs							5.50%	
										£2,000,378	
2.2 Build Costs											
2.2.1	Hotels (100 bed)	Size sq.m	4,645	Cost per sq.m	£1,076					Total Costs	£5,000,157
										£5,000,157	
2.3 Externals											
2.3.1	external works as a percentage of build costs		0.0%								£0
2.3.2	Demolition		£0								£0
										£0	
2.4 Professional Fees											
2.4.1	as percentage of build costs & externals		8%								£400,013
										£400,013	
2.5 Total construction costs										£5,400,169	
3.0 Contingency											
3.1	as a percentage of total construction costs		5%								£270,008.46
										£270,008	
4.0 Sale costs											
4.1	Marketing (offices & industrial)		£0								£0
4.2	Letting agent fee		0%	of rent							£0
4.3	Letting legals (offices)		£0	of rent							£0
4.4	Sale agents fee		1.25%	Capital value							£135,417
4.5	Sale legal fees		1.25%	Capital value							£135,417
										£270,833	
5.0 Policy costs											
5.1	Mayor CIL Calculated as a £ psm		£50								£232,250
5.2	Hotel CIL Calculated as a £ psm		£0								£0
										£232,250	
TOTAL DEVELOPMENT COSTS (excluding land payment)										£6,173,261	
TOTAL DEVELOPMENT COSTS (including land payment)										£8,290,063	
6.0 Developers' Profit											
6.1	as percentage of total development costs		Rate	20%							£1,658,013
										£1,658,013	
TOTAL PROJECT COSTS [EXCLUDING INTEREST]										£9,948,076	
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]										£451,924	
7.00 Finance Costs											
			APR	7.00%		PCM	0.565%				-£451,924
TOTAL PROJECT COSTS [INCLUDING INTEREST]										£10,400,000	

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Student accommodation (250 bed)		BOR5Student						
ITEM								
Net Site Area	0.30	Residual value	£19,695,961.66 per ha					
1.0 Development Value								
1.1	Student accommodation (250 bed)	No. of units	Rent per bed space	Management costs	Net rental per bed space	Yield	Value per unit	Capital Value
		250	£10,800	40%	£6,480	6.1%	£106,230	£26,557,377
								£26,557,377
								4.00%
Total development value								£25,495,082
2.0 Development Cost								
2.1 Site Acquisition								
2.1.1	Site value (residual land value)							£6,252,686
			Less Purchaser Costs					5.50%
								£5,908,788
2.2 Build Costs								
2.2.1	Student accommodation (250 bed)	Size sq.m	Cost per sq.m					
		7,000	£1,563					
								£10,941,000
2.3 Externals								
2.3.1	external works as a percentage of build costs		5.0%					
								£547,050
2.3.2	Demolition		£0					
								£0
								£547,050
2.4 Professional Fees								
2.4.1	as percentage of build costs & externals		8%					
								£919,044
								£919,044
2.5 Total construction costs								
								£12,407,094
3.0 Contingency								
3.1	as a percentage of total construction costs		5%					
								£620,354.70
								£620,355
4.0 Sale costs								
4.1	Marketing (offices & industrial)		£0					
								£0
4.2	Letting agent fee		0%	of rent				
								£0
4.3	Letting legals (offices)		£0	of rent				
								£0
4.4	Sale agents fee		1.25%	Capital value				
								£331,967
4.5	Sale legal fees		1.25%	Capital value				
								£331,967
								£663,934
5.0 Policy costs								
5.1	Mayor CIL Calculated as a £ psm		£50					
								£350,000
5.2	Student accommodaion CIL Calculated as a £ psm		£0					
								£0
								£350,000
TOTAL DEVELOPMENT COSTS (excluding land payment)								£14,041,383
TOTAL DEVELOPMENT COSTS (including land payment)								£20,294,069
6.0 Developers' Profit								
6.1	as percentage of total development costs		Rate					
			20%					
								£4,058,814
								£4,058,814
TOTAL PROJECT COSTS [EXCLUDING INTEREST]								£24,352,883
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]								£1,142,199
7.00 Finance Costs								
			APR		PCM			
			7.00%		0.565%			
								-£1,142,199
TOTAL PROJECT COSTS [INCLUDING INTEREST]								£25,495,082



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Leisure use		BOR6Leisure					
							
ITEM							
Net Site Area	0.15	Residual value	£6,970,681.45 per ha				
1.0 Development Value							
1.1	Leisure use	No. of units	Size sq.m	Rent	Yield	Capital Value	
		1	2000	£215	6.5%	£6,623,945	
					Rent free period	Adjusted for rent free	
					No. of months	3	£6,520,476
							4.00%
Total development value						£6,259,657	
2.0 Development Cost							
2.1 Site Acquisition							
2.1.1	Site value (residual land value)					£1,106,457	
	Less Purchaser Costs					5.50%	
						£1,045,602	
2.2 Build Costs							
2.2.1	Leisure use		Size sq.m	Cost per sq.m		Total Costs	
			2,000	£1,541		£3,082,000	
						£3,082,000	
2.3 Externals							
2.3.1	external works as a percentage of build costs		5.0%			£154,100	
2.3.2	Demolition		£0			£0	
						£154,100	
2.4 Professional Fees							
2.4.1	as percentage of build costs & externals		8%			£258,888	
						£258,888	
Total construction costs						£3,494,988	
3.0 Contingency							
3.1	as a percentage of total construction costs		5%			£174,749.40	
						£174,749	
4.0 Sale costs							
4.1	Marketing (offices & industrial)		£0			£0	
4.2	Letting agent fee		0%	of rent		£0	
4.3	Letting legals (offices)		£0	of rent		£0	
4.4	Sale agents fee		1.25%	Capital value		£82,799	
4.5	Sale legal fees		1.25%	Capital value		£82,799	
						£165,599	
5.0 Policy costs							
5.1	Mayor CIL Calculated as a £ psm		£50			£100,000	
5.2	Leisure CIL Calculated as a £ psm		£0			£0	
						£100,000	
TOTAL DEVELOPMENT COSTS (excluding land payment)						£3,935,336	
TOTAL DEVELOPMENT COSTS (including land payment)						£5,041,793	
6.0 Developers' Profit							
6.1	as percentage of total development costs		Rate	20%		£1,008,359	
						£1,008,359	
TOTAL PROJECT COSTS [EXCLUDING INTEREST]						£6,050,152	
TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]						£209,505	
7.00 Finance Costs							
			APR	7.00%		PCM	0.565%
						-£209,505	
TOTAL PROJECT COSTS [INCLUDING INTEREST]						£6,259,657	

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Appendix D Consultees

- Jones Lang LaSalle
- Parkgate Estate Agents
- Cushman and Wakefield
- Dexters Estate Agents
- Douglas and Gordon
- Gerald Eve
- Deloitte Real Estate
- CBRE
- Lambert Smith Hampton
- Capita Symonds
- Quod
- St James
- Metropolitan & Suburban
- Berkeley Group
- Stanhope
- National Grid Property Holdings
- Imperial College London
- BBC

Appendix 7 Equalities Impact Assessment (EqIA)

Full Equality Impact Analysis Tool



Section 01	Details of Full Equality Impact Analysis													
Financial Year and Quarter	2014 / Q2													
Name and details of policy, strategy, function, project, activity, or programme	<p>Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS)</p> <p>The Community Infrastructure Levy (CIL) is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area.</p> <p>The Draft Charging Schedule (DCS) represents the second stage of public consultation in the process that will lead to the introduction of CIL charges for most new development in the borough. It has been prepared taking into account the comments received on the Preliminary Draft Charging Schedule, which was subjected to public consultation in late 2012. This DCS is being subjected to a further round of public consultation before going forward for a formal independent public examination.</p>													
Page 242	<p>Name: Siddhartha Jha Position: Policy Planner Email: sid.jha@lbhf.gov.uk Telephone No: 0208 753 7032</p>													
Date of completion of final EIA	<p>August 2014 (DCS)</p> <p>The equality duty is a continuing duty and consideration of equality impacts will continue at each relevant stage in the preparation and publication of the emerging Charging Schedule. The expected timetable for the consultation and introduction of CIL in the borough is set out below:</p> <table border="1" data-bbox="533 1193 2134 1436"> <thead> <tr> <th data-bbox="533 1193 1032 1230">Timescales</th> <th data-bbox="1032 1193 2134 1230">Stage</th> </tr> </thead> <tbody> <tr> <td data-bbox="533 1230 1032 1273">7 Sep 2012 – 19 Oct 2012</td> <td data-bbox="1032 1230 2134 1273">Preliminary Draft Charging Schedule (PDCS) Consultation (6 weeks)</td> </tr> <tr> <td data-bbox="533 1273 1032 1316">22 Aug 2014 – 3 Oct 2014</td> <td data-bbox="1032 1273 2134 1316">Draft Charging Schedule (DCS) Consultation (7 weeks)</td> </tr> <tr> <td data-bbox="533 1316 1032 1359">Autumn/ Winter 2014</td> <td data-bbox="1032 1316 2134 1359">Submission of DCS for examination</td> </tr> <tr> <td data-bbox="533 1359 1032 1402">Late 2014</td> <td data-bbox="1032 1359 2134 1402">Independent public examination</td> </tr> <tr> <td data-bbox="533 1402 1032 1436">Early 2015</td> <td data-bbox="1032 1402 2134 1436">Publication and effect</td> </tr> </tbody> </table>		Timescales	Stage	7 Sep 2012 – 19 Oct 2012	Preliminary Draft Charging Schedule (PDCS) Consultation (6 weeks)	22 Aug 2014 – 3 Oct 2014	Draft Charging Schedule (DCS) Consultation (7 weeks)	Autumn/ Winter 2014	Submission of DCS for examination	Late 2014	Independent public examination	Early 2015	Publication and effect
Timescales	Stage													
7 Sep 2012 – 19 Oct 2012	Preliminary Draft Charging Schedule (PDCS) Consultation (6 weeks)													
22 Aug 2014 – 3 Oct 2014	Draft Charging Schedule (DCS) Consultation (7 weeks)													
Autumn/ Winter 2014	Submission of DCS for examination													
Late 2014	Independent public examination													
Early 2015	Publication and effect													

Section 02

Scoping of Full EIA

Plan for completion

Resources: Staff time
Lead Officer: Siddhartha Jha

What is the policy, strategy, function, project, activity, or programme looking to achieve?

The CIL DCS is consulting on introducing CIL charges for the borough as set out below:

Charging Zones	Residential	Office (B1a/b)	All uses unless otherwise stated	Health
				Education
				Industrial (B1(c)/B2)
	HMO (C4)			Warehousing (B8)
	Hostel			Selling/display of motor vehicles
				Scrapyards
				Hotel (C1)
North	£100/m ²	Nil	£80/m ²	Nil
Central A	£200/m ²	£80/m ²		
Central B		Nil		
South	£400/m ²			
White City East	Nil			
Earls Court & West Kensington Opportunity Area				



The documents supporting the CIL DCS, notably the CIL DCS Consultation Document and the Infrastructure Schedule (Appendix 3) both suggest general infrastructure categories (Appendix 2) and specific infrastructure schemes which are indicative examples of schemes which CIL may be spent on. Although the CIL DCS is primarily concerned with setting the above CIL charge rates (i.e. setting CIL *receipts*), for the purposes of this EqIA, consideration is also given to the potential infrastructure schemes which CIL may be spent on (i.e. CIL *expenditure*) bearing in mind that CIL represents one source of funding for infrastructure schemes alongside many other possible sources of funding.

Section 03

Analysis of relevant data and/or undertake research

Documents and data reviewed

NATIONAL DOCUMENTS

The following national documents have been considered for the purposes of preparing the CIL DCS (see section 2 of the DCS Consultation Document):

Document	Publisher	Date
Town and Country Planning Act 1990 (as amended by the Planning and Compensation Act 1991 and others)	HM Government	May 1990
Planning Act 2008	HM Government	Nov 2008
The CIL Regulations 2010 (as amended 2011, 2012, 2013, 2014)	HM Government	2010-2014
Localism Act 2011	HM Government	Nov 2011
National Planning Policy Framework (NPPF)	DCLG	Mar 2012
National Planning Practice Guidance (NPPG): Local Plans	DCLG	Mar 2014
National Planning Practice Guidance (NPPG): Planning Obligations	DCLG	Mar 2014
National Planning Practice Guidance (NPPG): Viability	DCLG	Mar 2014
National Planning Practice Guidance (NPPG): CIL	DCLG	May 2014

In addition to these, other national documents have also been considered for the purposes of considering equalities issues for this DCS:

CIL: Initial Impact Assessment	DCLG	Nov 2007
CIL: Impact Assessment	DCLG	Nov 2008
CIL: Impact Assessment	DCLG	Dec 2008
CIL: Partial Impact Assessment	DCLG	Jul 2009
CIL: Final Impact Assessment	DCLG	Feb 2010
Explanatory Memorandum to the CIL Regulations	DCLG	Mar 2010
Localism Bill: CIL – Impact Assessment	DCLG	Jan 2011
Explanatory Memorandum to the CIL (Amendment) Regulations 2011 No.987	DCLG	Mar 2011

Explanatory Memorandum to the CIL (Amendment) Regulations 2014 No.385	DCLG	Feb 2014
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Localism Bill CIL Impact Assessment

The Localism Bill CIL Impact Assessment provides a general overview at a national level of the impact of CIL. Page 1 states:

“The Community Infrastructure Levy was introduced as an alternative to planning obligations. It provides a simpler, fairer and more transparent system of standard charges to unlock additional funding for infrastructure and respond to the needs of local communities. The planning obligations system by which developers contribute funding for infrastructure is often slow and unpredictable, based on ad hoc negotiations conducted in private. Research shows the burden of funding is unfair, falling primarily on major residential developments.”

It also describes a further benefit of CIL as ensuring “funding for vital infrastructure projects for communities that might otherwise not be delivered and thereby help to deliver further development and the benefits associated with this” (page 3). Page 8 lists several advantages of CIL over the current system of planning obligations including: simplicity; predictability; transparency; fairness; and efficiency.

REGIONAL DOCUMENTS

The following regional documents have been considered for the purposes of preparing the CIL PDCS (see section 2 of the DCS Consultation Document):

Document	Publisher	Date
The London Plan: Spatial Development Strategy for Greater London	GLA	Jul 2011
Mayor of London CIL Charging Schedule	GLA	Apr 2012
London Implementation Plan 1	GLA	Jan 2013
CIL Instalments Policy	GLA	Mar 2013
Use of Planning obligations in the funding of Crossrail and the Mayoral CIL SPG (Crossrail SPG)	GLA	Apr 2013
The London Plan: Spatial Development Strategy for Greater London: Revised Early Minor Alterations: Consistency with the National Planning Policy Framework	GLA	Oct 2013

Draft Further Alterations to The London Plan (FALP)	GLA	Jan 2014
Long Term Infrastructure Investment Plan for London: Progress Report	GLA	Mar 2014
London Planning Statement SPG	GLA	May 2014
Draft Social Infrastructure SPG	GLA	Jun 2014

In addition to these, other regional documents have also been considered for the purposes of considering equalities issues for this DCS:

Report to the Mayor of London: Mayoral CIL: Approval of Charging Schedule	GLA	Feb 2012
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LOCAL DOCUMENTS

The following local documents have been considered for the purposes of preparing the CIL DCS (see section 2 of the DCS Consultation Document):

Document	Publisher	Date
Community Strategy 2007-2014	LBHF	Sep 2007
Park Royal Opportunity Area Planning Framework (OAPF)	GLA / LBHF / LB Ealing / LB Brent	Jan 2011
Core Strategy Development Plan Document (DPD)	LBHF	Oct 2011
Earls Court Viability Study: Development Infrastructure Funding Study	DVS	November 2011
Earls Court and West Kensington Opportunity Area Joint Supplementary Planning Document (SPD)	GLA / LBHF / RBKC	Mar 2012
South Fulham Riverside Delivery and Infrastructure Funding Study	CgMs; Cushman & Wakefield; Jacobs	Mar 2012
South Fulham Riverside Supplementary Planning Document (SPD)	LBHF	Jan 2013
White City Development Infrastructure Funding Study	AECOM; Deloitte	May 2013

Old Oak: A Vision for the Future	GLA / LBHF / LB Ealing / LB Brent	Jun 2013
Development Management Local Plan (DM LP)	LBHF	Jul 2013
Planning Guidance Supplementary Planning Document (PG SPD)	LBHF	Jul 2013
White City Opportunity Area Planning Framework (OAPF)	GLA / LBHF	Oct 2013
Local Plan Review: Issues and Options for Review	LBHF	Jul 2013
Monitoring Report April 2012 to March 2013	LBHF	Aug 2014

In addition to these, other local documents have also been considered for the purposes of considering equalities issues for this DCS:

Opportunity for All: Single Equality Scheme 2009-12	LBHF	February 2010
Core Strategy DPD EqIA	LBHF	July 2011
DM DPD EqIA	LBHF	July 2013
PG SPD EqIA	LBHF	July 2013

The CIL DCS has been drafted taking into account the context set by all of the above documents. In particular, the Core Strategy, DM DPD and PG SPG have all had individual EqIAs undertaken.

The Equality Act 2010

The Council is no longer required to produce equality schemes (e.g. those for race, disability, gender). The Council adopted its response to the new requirements (S153 of the Act) in December 2011. The Council gave feedback to the public at a public meeting on its Single Equality Scheme ('SES') 2009-2012 in July 2012. The objectives of the SES were based on the same Community Strategy objectives as the Core Strategy. The CIL DCS is based on these same broad objectives. While the SES is now complete, it is relevant insofar as it has had outcomes for equality groups in mind and informed the Council's strategic planning policy.

LOCAL DEMOGRAPHICS OF EQUALITY TARGET GROUPS

A summary of the demographic situation in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of the DCS on these groups. **Demographics of Equality Target Groups**

A summary of the demographic situation in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of the DM LP on these groups. Data includes the 2011 Census.

Population

The population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years. In 2011, nearly half of the population (46.8%) was between 20 and 40 years old which was significantly higher than the London (37.3%) and the national (28.5%) averages.

The borough has a high proportion of single people (55.9%) compared to 34% in England & Wales, and 37.5% of all households consisted of one person households in 2011.

It is projected by the GLA (taking account of the borough's housing target of an additional 615 dwellings per annum) that the population will increase from 182,400 in 2011 to 209,000 in 2031, (a 14.6% increase). This compares to a 22% increase for Inner London as a whole.

Between 2010 and 2031, the population aged 20 to 49 is expected to grow by 6.5%, the population aged 50 to 64 by 37%, the population aged 65 to 79 by 15% and the population over 80 by 23%.

Households will increase by 9% from 76,400 households in 2008 to 83,130 in 2033 (Source: DCLG). It is projected that the main growth in number of households will be in 'one person' households (21% up to 2033), while the number of 'co-habiting couples' households will decrease by nearly 11% between 2008 and 2033.

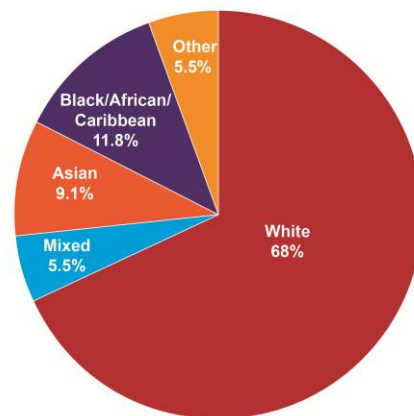
Race

According to the Census 2011, 32% of the borough's population in 2011 belonged to ethnic groups other than white. This represents an increase of nearly 10% since 2001. The main ethnicity in the borough was 'white people' (68 %) followed by people from 'black African' origin (5.7%) and the 'other'¹ group.

In 2011, the white population represented 80% of the economically active population followed by the Black African ethnic group (4.4%) and the 'other group' (3.90%).

¹ The other group refers to the two ONS 2011 Census Ethnic Category: 'other Asian or any other ethnic group'.

Figure 1: Ethnic groups in Hammersmith & Fulham, Census 2011



Source: Office for National Statistics

Disability

The rate of physical disability registrations for Hammersmith and Fulham as a whole is 37.3 registrations per 1,000 population. The Single Equalities Scheme (SES) from 2009-12 indicates that around 15% of residents in Hammersmith and Fulham have a disability. College Park and Old Oak has the highest rate of physical disability registrations in the borough (53.95). The five wards with the highest rates are all in the north of the borough; College Park and Old Oak, Wormholt and White City, Shepherd's Bush Green, Hammersmith Broadway and Askew. Palace Riverside has the lowest rate of registrations in the borough. Physical disability registration is voluntary so the figures do not give a complete picture of disability within Hammersmith & Fulham. In 2011, 12.6% of the borough population had limited day-to-day activities in the borough.

We recognise that people with disabilities and those that support them may be represented in one or more of the other equality groups. The other related group that is usually referenced is age, in particular, we recognise that people with disabilities who can experience difficulty accessing services and accessing the built environment are often children and young people, older people, and those who may provide care for older and younger disabled people. As disability covers a broad spectrum, we also recognise that adaptations for people with mobility impairments may not make the built environment accessible for people with sensory impairments, and that people

with mental health or long-term limiting illnesses may have different requirements from their environment. It is for these reasons that we actively engaged with the Hammersmith and Fulham Disability Forum, the local user group representing disabled people.

Figure 2: Number of people registered with a disability



Source: Community Services registrations

Gender

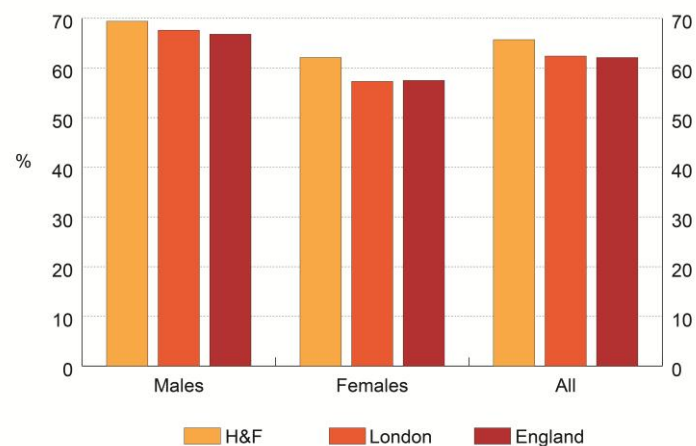
In 2011, there were more women in the borough than men (there were also more women than men in London).

The Single Equalities Scheme (SES) indicates that there are more female headed households in the borough which represents a key equality gap for Hammersmith and Fulham.

Women are less economically active than men representing respectively 70% and 78% in 2011. These figures are higher than the London figures of 66% for women and 77.5% for men (Source: Census 2011).

Hammersmith & Fulham has a marginally higher proportion of male residents in employment (69.4%) than the London (67.6%) and national averages (66.8%). The proportion of female residents in employment (62.1%) is also higher than the London (57.3%) and national averages (57.5%).

For commentary regarding transgendered or transitioning people, see 'sexual orientation (and transgender)' below. For the assessment of policies, transgendered or transitioning people are represented in the gender category (see section 05).

Figure 3: Employment in Hammersmith and Fulham, Census 2011

Source: Office for National Statistics

Religion

The religious profile of the borough is less diverse than in London as a whole. In 2011, 54.1% of residents in the borough were Christians, 10% Muslim and 23.8% stated that they had no religion.

This partly reflects the ethnic profile of the borough, with a higher White population who are predominantly Christian and a lower Asian population who have a more diverse religious profile.

The policies in the DM LP are not aimed specifically at religious groups, but it is noted that members of this population will also be represented through one or more other equality strands and that race and religion are often linked, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities, better transport and quality of built environment. Further, places of worship are supported in the DM LP policies D1 and D2 that are concerned with community services and arts, culture and leisure respectively.

Age

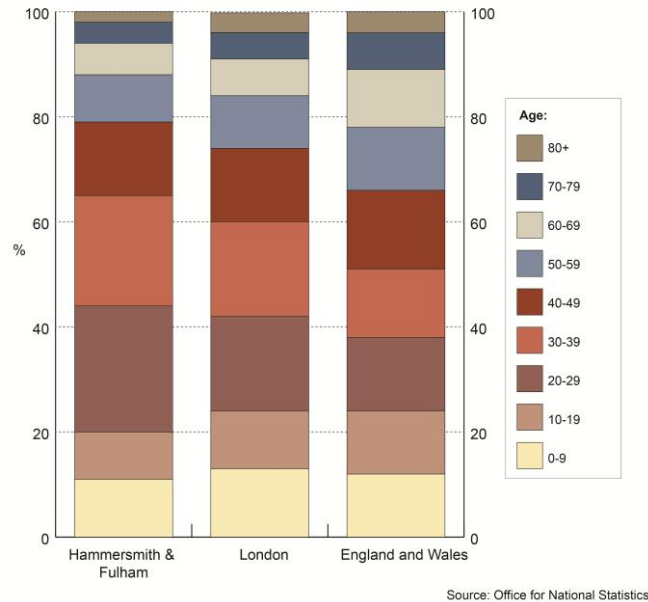
In 2011, the borough had a higher proportion of young adults aged 25-39 (35.7%) than London (28%) and England and Wales (20%). Conversely, the proportion of children and young adults (0-24) in the borough was

lower than in London (26.7% compare to 32.2%) and England and Wales (30.7%).

12.7% of the population is aged 60 or over, which is slightly lower than the London (15.2%) and England and Wales (20.3%) averages.

According to the H&F Carer's Strategy 2005-2010 and Experian Mosaic Data for the borough, older residents in the borough are more likely to live alone.

Figure 4: Age structure (% of total population, Census 2011)



Sexual Orientation (and transgender)

The nature of issues facing LGB people can be similar to transgendered or transitioning people as well, hence the council often use the term LGBT (lesbian, gay, bisexual and transgender). This is relevant when assessing impacts and looking at populations, for there are no official statistics on sexual orientation or gender identity, as these are not routinely captured by public bodies, and are not captured by the census. However:

‘In 2005, the Department for Trade and Industry published a figure of 6% as the percentage of LGBT people in the general population..... the number of LGBT people in London is thought to be anywhere between 6% and 10% of the total population, increased by disproportionate levels of migration. This equates to an urban population of between 450,000 and 750,000’ (Kairos in Soho, *London’s LGBT Voluntary Sector Infrastructure Project*, 25:2007).

To put this in a local context so far as is possible, although there are no accurate statistics for the numbers of lesbian, gay and bisexual residents in the borough, the 2011 census recorded that 568 people (or 1.1% of couples), aged 16 and over, were living as same sex couples in Hammersmith and Fulham. In 2011, there were 299 same sex civil partnerships in the borough.

This gives us some of the picture but within the parameters of the DTI figures, we note that these local statistics may hide single LGB people, or LGB people who have not entered into civil partnerships. We do not have specific data on transgendered or transitioning people. The policies in the DM LP are not aimed specifically at LGBT people but it is noted that members of this population will also be represented through one or more other equality strands, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities, better transport and quality of built environment.

Socio-economic

In 2010, Hammersmith & Fulham is ranked as the 55th most deprived local authority in England, in the country and there are significant pockets of deprivation.

The 2011 Census shows that Hammersmith & Fulham is a polarised borough with relatively high proportions of residents who are either high earners or low earners. Census measures also show very high degrees of polarisation compared to other local authorities in educational attainment and occupation levels.

H&F has high proportions of working age residents in higher-paid jobs. In 2011, 14.6% were managers and senior officials compared to 11.6% in London and 10.8% in England and Wales.

27% were in professional positions: this has increased significantly from 2001 when only 19.6% fell within this occupation group. Conversely, the Associate and Technical occupations category has decreased slightly from 23.5% in 2001 to 22.1% in 2011.

Also, in 2011, 6.7% of the population were in the 'elementary occupations' category compared to 9.6% in London and 11.1% in the UK.

In terms of economic inactivity, 26% of the 16-74 population in 2011 was inactive compared to an average of 28.3% in London.

New research

It is considered that no new research is required for this EqIA.

Section 04	Undertake and analyse consultation
<p>Consultation</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 254</p>	<p>The expected timetable for the consultation and introduction of CIL in the borough is set out in section 1. The consultation welcomes comments on the EqIA.</p> <p>Formal representations on the DCS and the supporting evidence base documents are welcomed by the council. Representations on the Neighbourhood CIL and the Equalities Impact Assessment (EqIA), which are separate to the formal Draft Charging Schedule consultation are also welcomed by the council.</p> <p>The council proposes to subject the DCS and associated evidence and other relevant documents to a 7 week public consultation period (22 August 2014 – 3 October 2014). This exceeds the 4 week statutory public consultation period required by the CIL Regulations (Reg 17(3)), the 6 week consultation recommended by NPPG CIL (para.031) and the Revised Statement of Community Involvement (Oct 2013).</p> <p>The opportunity to take part in consultation on the DCS is available to all persons including borough residents, businesses, voluntary bodies and business groups. The database of consultees that has been compiled for consultation on the Local Development Framework (LDF) / Local Plan documents includes a number of BME and other groups that will also be notified of the DCS consultations and invited to make representations. The CIL DCS will also be on the agenda of any future ‘Agents Forum’ meeting which will assist with explaining the DCS and inviting consultation representations from known planning agents operating in the borough acting on behalf of large and small businesses and landowners.</p> <p>Consultation documents will be made available on the council’s website; in council libraries and in Hammersmith Town Hall Extension. A notice will also be placed in a local newspaper advising the local community that the documents will be available for inspection at the abovementioned venues. The document will also be made available in large copy print, audio cassette or Braille upon request. Any person may make representations which are invited by email and/or post.</p>
<p>Analysis</p>	<p>Formal representations on the DCS and the supporting evidence base documents will be submitted to an independent examiner as part of the independent public examination and will be made publicly available for inspection on the council’s website and other locations.</p> <p>Representations on the Neighbourhood CIL and the Equalities Impact Assessment (EqIA), which are separate to the formal DCS consultation, will not be submitted to an independent examiner as they will not be part of the independent public examination. A summary of the representations will be made publicly available for inspection on the council’s website.</p>

Section 05

Analysis of impact and outcomes

Analysis

PROTECTED CHARACTERISTICS AND THE PUBLIC SECTOR EQUALITY DUTIES (PSED)

This EQIA analyses the likely impacts of the CIL DCS on statutorily identified protected characteristics, human rights and children's rights. It will also assess the CIL DCS against the public sector equality duties (PSED) in S149 of the Equality Act 2010 which states that in the exercise of our functions the council must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

Having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

PSED ANALYSIS

The analysis includes a rating of the relevance of the policies to the protected characteristics listed as:

High (H)	The policy, strategy, function, project, activity, or programme is relevant to all or most parts of the general duty, and/or to human/children's rights
	There is substantial or a fair amount of evidence that some groups are (or could be) differently affected by it
	There is substantial or a fair amount of public concern about it
Medium (M)	The policy, strategy, function, project, activity, or programme is relevant to most parts of the general duty, and/or to human/children's rights
	There is some evidence that some groups are (or could be) differently affected by it
	There is some public concern about it
Low (L)	The policy, strategy, function, project, activity, or programme is not generally relevant to most parts of the general duty, and/or to human/children's rights
	There is little evidence that some groups are (or could be) differently affected by it
	There is little public concern about it
Not Applicable (N/A)	Not applicable

The impacts of the policy on the protected characteristics are also analysed and rated as:

Positive (+)	The EIA shows the policy is not likely to result in adverse impact for any protected characteristic and does advance equality of opportunity, and/or fulfils PSED in another way
Neutral	The EIA shows the policy, strategy, function, project or activity is not likely to result in adverse impact for any protected characteristic and does not advance equality of opportunity, and/or fulfils PSED in another way
Negative (-)	The EIA shows the policy, strategy, function, project or activity is likely to have an adverse impact on a particular protected characteristic(s) and potentially does not fulfil PSED, or the negative impact will be mitigated through another means

Proposed CIL charges / zones impact		
Residential (C3); HMO (C4); Hostel £100-300/m²	Although the proposed charge for residential uses varies across the borough, this is based on evidence that residential development viability varies across the borough, so there should be no overall detrimental impact on delivery of residential development across the borough.	
	Age Minimal impact on the availability of accommodation across the borough for any age group.	L Neutral
	Disability Minimal impact on the availability of accommodation across the borough for any level of ability/disability.	L Neutral
	Gender reassignment Minimal impact on the availability of accommodation across the borough for all people whether experiencing gender reassignment or not.	L Neutral
	Marriage and Civil Partnership Minimal impact on the availability of accommodation across the borough for all people whether single-person, couple or family.	L Neutral
	Pregnancy and maternity Minimal impact on the availability of accommodation across the borough for all people whether experiencing pregnancy, maternity, parenthood or not.	L Neutral
	Race Minimal impact on the availability of accommodation across the borough for any race, including where race/culture may have an influence on household size.	L Neutral
	Religion/belief (including non-belief) Minimal impact on the availability of accommodation across the borough for any religion/belief/non-belief, including where religion/belief/non-belief may have an influence on household size.	L Neutral
	Sex Minimal impact on the availability of accommodation across the borough for either sex.	L Neutral
	Sexual Orientation Minimal impact on the availability of accommodation across the borough for any sexual orientation.	L Neutral

Office (B1a/b) £0-£80/m²	Although the proposed charge for office uses varies across the borough, this is based on evidence that office development viability varies across the borough, so there should be no overall detrimental impact on delivery of office development across the borough. Where a £0/m ² charge is applied to such development, S106 contributions can still be sought (if in accordance with S106 tests, pooling restrictions and policy) to ensure any necessary supporting infrastructure or mitigating measures are delivered.			
	Age	Minimal impact on employment opportunities across the borough for any age group, including the working population.	L	Neutral
	Disability	Minimal impact on employment opportunities across the borough for any level of ability/disability.	L	Neutral
	Gender reassignment	Minimal impact on employment opportunities across the borough for all people whether experiencing gender reassignment or not.	L	Neutral
	Marriage and Civil Partnership	Minimal impact on employment opportunities across the borough for all people whether single-person, couple or family.		
	Pregnancy and maternity	Minimal impact on the employment opportunities across the borough for all people whether experiencing pregnancy, maternity, parenthood or not.	L	Neutral
	Race	Minimal impact on the employment opportunities across the borough for any race.	L	Neutral
	Religion/belief (including non-belief)	Minimal impact on the employment opportunities across the borough for any religion/belief/non-belief.	L	Neutral
	Sex	Minimal impact on the employment opportunities across the borough for either sex.	L	Neutral
	Sexual Orientation	Minimal impact on the employment opportunities across the borough for any sexual orientation.	L	Neutral
Health £0/m²	The proposed charge for health uses is zero and so there should be no detrimental impact on delivery of health development. Where a £0/m ² charge is applied to such development, S106 contributions can still be sought (if in accordance with S106 tests, pooling restrictions and policy) to ensure any necessary supporting infrastructure or mitigating measures are delivered.			

	Age	No impact on access to healthcare for any age group, including the particularly vulnerable young or elderly age groups.	N/A	Neutral
	Disability	No impact on access to healthcare for any level of ability/disability, including disabled people who may need greater access to healthcare.	N/A	Neutral
	Gender reassignment	No impact on access to healthcare for all people whether experiencing gender reassignment or not.	N/A	Neutral
	Marriage and Civil Partnership	No impact on access to healthcare for all people whether single-person, couple or family.	N/A	Neutral
	Pregnancy and maternity	No impact on access to healthcare for all people whether experiencing pregnancy, maternity, parenthood or not.	N/A	Neutral
	Race	No impact on access to healthcare for any race.	N/A	Neutral
	Religion/belief (including non-belief)	No impact on access to healthcare for any religion/belief/non-belief.	N/A	Neutral
	Sex	No impact on access to healthcare for either sex.	N/A	Neutral
	Sexual Orientation	No impact on access to healthcare for any sexual orientation.	N/A	Neutral
	Education £0/m²	The proposed charge for education uses is zero and so there should be no detrimental impact on delivery of education development. Where a £0/m ² charge is applied to such development, S106 contributions can still be sought (if in accordance with S106 tests, pooling restrictions and policy) to ensure any necessary supporting infrastructure or mitigating measures are delivered.		
Age		No impact on access to education for any age group, including the young, young adults, or those seeking adult education.	N/A	Neutral
Disability		No impact on access to education for any level of ability/disability.	N/A	Neutral

		Gender reassignment No impact on access to education for all people whether experiencing gender reassignment or not.	N/A	Neutral	
		Marriage and Civil Partnership No impact on access to education for all people whether single-person, couple or family.	N/A	Neutral	
		Pregnancy and maternity No impact on access to education for all people whether experiencing pregnancy, maternity, parenthood or not.	N/A	Neutral	
		Race No impact on access to education for any race.	N/A	Neutral	
		Religion/belief (including non-belief) No impact on access to education for any religion/belief/non-belief.	N/A	Neutral	
		Sex No impact on access to education for either sex.	N/A	Neutral	
		Sexual Orientation No impact on access to education for any sexual orientation.	N/A	Neutral	
		Industrial (B1(c)/B2) ; Warehousing (B8); Selling/display of motor vehicles; Scrapyards; Hotel (C1) £0/m²	The proposed charge for industrial, warehousing, selling/display of motor vehicles, scrapyards and hotel uses is zero and so there should be no detrimental impact on delivery of such development. Where a £0/m ² charge is applied to such development, S106 contributions can still be sought (if in accordance with S106 tests, pooling restrictions and policy) to ensure any necessary supporting infrastructure or mitigating measures are delivered.		
		Age No impact on employment opportunities for any age group, including the working population.	N/A	Neutral	
		Disability No impact on employment opportunities for any level of ability/disability.	N/A	Neutral	
		Gender reassignment No impact on employment opportunities for all people whether experiencing gender reassignment or not.	N/A	Neutral	
		Marriage and Civil Partnership No impact on employment opportunities for all people whether single-person, couple or family.	N/A	Neutral	

		Pregnancy and maternity No impact on employment opportunities for all people whether experiencing pregnancy, maternity, parenthood or not.	N/A	Neutral
		Race No impact on employment opportunities for any race.	N/A	Neutral
		Religion/belief (including non-belief) No impact on employment opportunities for any religion/belief/non-belief.	N/A	Neutral
		Sex No impact on employment opportunities for either sex.	N/A	Neutral
		Sexual Orientation No impact on employment opportunities for any sexual orientation.	N/A	Neutral
	All uses unless otherwise stated £80/m²	The proposed charge for all other uses is based on development viability evidence, so there should be no overall detrimental impact on delivery of other uses development across the borough.		
		Age Minimal impact on any age group.	L	Neutral
		Disability Minimal impact on any level of ability/disability.	L	Neutral
		Gender reassignment Minimal impact for all people whether experiencing gender reassignment or not.	L	Neutral
		Marriage and Civil Partnership Minimal impact for all people whether single-person, couple or family.	L	Neutral
		Pregnancy and maternity Minimal impact for all people whether experiencing pregnancy, maternity, parenthood or not.	L	Neutral
		Race Minimal impact for any race.	L	Neutral
		Religion/belief (including non-belief) Minimal impact for any religion/belief/non-belief.	L	Neutral
		Sex Minimal impact for either sex.	L	Neutral

		Sexual Orientation Minimal impact for any sexual orientation.	L	Neutral
White City East	City	The proposed charge for White City East and Earls Court & West Kensington Opportunity Area is zero and is based on development viability evidence, so there should be no overall detrimental impact on delivery of development in these areas. Where a £0/m ² charge is applied to such development, S106 contributions can still be sought (if in accordance with S106 tests, pooling restrictions and policy) to ensure any necessary supporting infrastructure or mitigating measures are delivered.		
Earls Court & West Kensington Opportunity Area		Age Minimal impact on any age group.	L	Neutral
£0/m²		Disability Minimal impact on any level of ability/disability.	L	Neutral
		Gender reassignment Minimal impact for all people whether experiencing gender reassignment or not.	L	Neutral
		Marriage and Civil Partnership Minimal impact for all people whether single-person, couple or family.	L	Neutral
		Pregnancy and maternity Minimal impact for all people whether experiencing pregnancy, maternity, parenthood or not.	L	Neutral
		Race Minimal impact for any race.	L	Neutral
		Religion/belief (including non-belief) Minimal impact for any religion/belief/non-belief.	L	Neutral
		Sex Minimal impact for either sex.	L	Neutral
		Sexual Orientation Minimal impact for any sexual orientation.	L	Neutral
Potential CIL-funded infrastructure schemes*				
Drainage & Flooding, Highways &		Infrastructure which may potentially be funded by CIL includes sustainable urban drainage, schemes which provide better transport access to jobs/services, improved public transport services and step-free access.		

	Transport	Age Positive impact on all age groups, but in particular the young, young adult or elderly age groups who may have more limited mobility.	M	+
		Disability Positive impact on all levels of ability/disability, but in particular disabled people with particular mobility and/or transport access needs.	M	+
		Gender reassignment Positive impact on people whether experiencing gender reassignment or not.	L	+
		Marriage and Civil Partnership Positive impact on people whether single-person, couple or family.	L	+
		Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not, but in particular, those with particular mobility and/or transport access needs arising from pregnancy and caring for babies/children.	M	+
		Race Positive impact for all races.	L	+
		Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief, but in particular those requiring transport access to religious centres or places of worship.	M	+
		Sex Positive impact for either sex.	L	+
		Sexual Orientation Positive impact for any sexual orientation.	L	+
	Waste & Street Enforcement, Energy & Environmental Health	Infrastructure which may potentially be funded by CIL includes schemes which provide waste facilities, energy, environmental health, noise and air quality improvements.		
		Age Positive impact on all age groups, but in particular the young or elderly age groups who may be more vulnerable to environmental health impacts.	M	+
		Disability Positive impact on all levels of ability/disability, but in particular disabled people who may be more vulnerable to environmental health impacts.	M	+
		Gender reassignment Positive impact on people whether experiencing gender reassignment or not.	L	+

		Marriage and Civil Partnership Positive impact on people whether single-person, couple or family.	L	+
		Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not, but in particular pregnant women who may be more vulnerable to environmental health impacts.	M	+
		Race Positive impact for all races.	L	+
		Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief.	L	+
		Sex Positive impact for either sex.	L	+
		Sexual Orientation Positive impact for any sexual orientation.	L	+
	Economic development, adult learning & skills	Infrastructure which may potentially be funded by CIL includes schemes which provide access to jobs, training, (small) business engagement and adult learning. It should be noted, however, that this infrastructure category is likely to have only a few schemes which qualify for CIL for legal reasons and may continue to be provided predominantly by S106s.		
		Age Positive impact on all age groups, but in particular young adults and the working age population.	M	+
		Disability Positive impact on all levels of ability/disability, but in particular disabled people who may benefit from specialist training or business engagement.	M	+
		Gender reassignment Positive impact on people whether experiencing gender reassignment or not.	L	+
		Marriage and Civil Partnership Positive impact on people whether single-person, couple or family.	L	+
		Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not.	L	+

		Race Positive impact for all races, but in particular those whose first language may not be English and may require support in terms of training, business engagement and/or adult learning to help access jobs.	M	+
		Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief.	L	+
		Sex Positive impact for either sex.	L	+
		Sexual Orientation Positive impact for any sexual orientation.	L	+
	Culture, Community Investment, Libraries & Archives	Infrastructure which may potentially be funded by CIL includes schemes which provide third sector hubs, disability services accommodation, community space and libraries.		
		Age Positive impact on all age groups, but in particular, the young and the elderly who may have a greater need for such services.	M	+
		Disability Positive impact on all levels of ability/disability, but in particular disabled people who may have a greater need for such services.	M	+
		Gender reassignment Positive impact on people whether experiencing gender reassignment or not.	L	+
		Marriage and Civil Partnership Positive impact on people whether single-person, couple or family, but in particular those seeking marriage or civil partnership who may have a greater need to access appropriate venues for ceremonies.	M	+
		Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not, but in particular those who may have a greater need for such services.	M	+
		Race Positive impact for all races, but in particular those who may have a greater need for such services.	M	+

		Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief, but in particular those who may have a greater need for such services which may be related to religion/belief/non-belief.	M	+	
		Sex Positive impact for either sex.	L	+	
		Sexual Orientation Positive impact for any sexual orientation.	L	+	
	Children's Services, Early Years, Schools & Youth	Infrastructure which may potentially be funded by CIL includes schemes which provide nurseries, schools and special education.			
		Age Positive impact on all age groups, but in particular the young, young adults, or those seeking adult education.	M	+	
		Disability Positive impact on all levels of ability/disability, but in particular disabled people who may require specialist educational services to meet their needs.	M	+	
		Gender reassignment Positive impact on people whether experiencing gender reassignment or not.	L	+	
		Marriage and Civil Partnership Positive impact on people whether single-person, couple or family.	L	+	
		Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not.	L	+	
		Race Positive impact for all races.	L	+	
		Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief.	L	+	
		Sex Positive impact for either sex.	L	+	
		Sexual Orientation Positive impact for any sexual orientation.	L	+	
	Adult Social Care & Health	Infrastructure which may potentially be funded by CIL includes schemes which provide adult social care, mental health and primary care services.			

	Age Positive impact on all age groups, but in particular the young or elderly age groups who may have a greater need for health services.	M	+
	Disability Positive impact on all levels of ability/disability, but in particular disabled people who may have a greater need for health services.	M	+
	Gender reassignment Positive impact on people whether experiencing gender reassignment or not, but in particular those experiencing gender reassignment who may have a greater need for health services to assist with reassignment.	M	+
	Marriage and Civil Partnership Positive impact on people whether single-person, couple or family.	L	+
	Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not, but in particular those who may have a greater need for health services.	M	+
	Race Likely to have a positive impact for all races, but in particular those who may have a greater need for particular health services.	M	+
	Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief.	L	+
	Sex Positive impact for either sex.	L	+
	Sexual Orientation Positive impact for any sexual orientation.	L	+
	Emergency services & community safety	Infrastructure which may potentially be funded by CIL includes schemes which provide policing, community safety hubs and CCTV.	
Age Positive impact on all age groups, but in particular the young or elderly age groups who may be more vulnerable to crime or the fear of crime.		M	+
Disability Positive impact on all levels of ability/disability.		L	+
Gender reassignment Positive impact on people whether experiencing gender reassignment or not.		L	+

		Marriage and Civil Partnership Positive impact on people whether single-person, couple or family.	L	+
		Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not.	L	+
		Race Positive impact for all races, but in particular those groups (including minority ethnic groups) who may be more likely to experience or fear racism and/or hate crime(s).	M	+
		Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief, but in particular those groups who may be more likely to experience or fear hate crime(s) based on their religion.	M	+
		Sex Positive impact for either sex.	L	+
		Sexual Orientation Positive impact for any sexual orientation, but in particular those groups who may be more likely to experience or fear hate crime(s) based on their sexual orientation.	M	+
	Leisure Parks	& Infrastructure which may potentially be funded by CIL includes schemes which provide leisure and sport facilities, parks/park improvements and play spaces / improvements.		
		Age Positive impact on all age groups with regard to health benefits, but in particular the young who benefit from play space provision.	M	+
		Disability Positive impact on all levels of ability/disability with regard to health benefits, but in particular disabled people who may require specialist leisure/sport infrastructure or benefit from access improvements in parks.	M	+
		Gender reassignment Positive impact on people whether experiencing gender reassignment or not.	L	+
		Marriage and Civil Partnership Positive impact on people whether single-person, couple or family.	L	+

Pregnancy and maternity Positive impact for all people whether experiencing pregnancy, maternity, parenthood or not.	L	+
Race Positive impact for all races.	L	+
Religion/belief (including non-belief) Positive impact for all religions/beliefs/non-belief.	L	+
Sex Positive impact for either sex.	L	+
Sexual Orientation Positive impact for any sexual orientation.	L	+

*From the Infrastructure Schedule, a background document to the DCS. Note that the purpose of the Infrastructure Schedule is to demonstrate an aggregate funding gap for infrastructure across the borough, primarily for CIL purposes and *not* to represent a detailed spending plan for infrastructure schemes which S106 or CIL monies can be spent on. Identification of schemes in the Infrastructure Schedule does not mean that they will necessarily have CIL monies spent on them – this is dependent on the public consultation, examination, and the circumstances at the time, including prioritising infrastructure schemes. It follows that schemes have been suggested here *as indicative examples of schemes which CIL may be spent on* only for the purposes of assessing equality impacts. Some categories of infrastructure, for example economic development, adult learning and skills, are likely to have only a few schemes which qualify for CIL for legal reasons and may continue to be provided predominantly by S106s. The proposed consultation also includes consultation on the Neighbourhood CIL where suggestions can be put forward for CIL expenditure, which will also be considered by the council in due course.

HUMAN RIGHTS

Will it affect Human Rights, as defined by the Human Rights Act 1998?

No

It is worth noting that the amendments to the CIL legislation assessed in the Localism Bill CIL Impact Assessment were deemed by the government to “not have an adverse impact on human rights” (page 25). Further the explanatory memorandum for the 2104 amendments to the CIL Regulations 2010 states that the amendments “are compatible with the [European] Convention [on human] rights” (para.6).

CHILDREN'S RIGHTS

Will it affect Children's Rights, as defined by the UNCRC (1992)?

No

OTHER ANALYSES

It is also considered important to consider the potential impacts of the proposed CIL charges and zones in the DCS for other general groups as set out below.

Affordable housing	<p>It should be noted that a significant factor influencing viability of residential development schemes is the provision of affordable housing for different tenures. The Viability Study document which supports the CIL DCS demonstrates that the proposed CIL charges can be achieved without having an overall impact on delivering policy-compliant levels of affordable housing.</p> <p>It is acknowledged that affordable housing can help advance equality issues for protected characteristics and groups.</p>	L	Neutral
Social groups	<p>The Localism Bill CIL Impact Assessment considers that CIL "is unlikely to have an adverse impact on any social group" (page 25).</p> <p>The Report to the Mayor of London on the Mayoral CIL states that "It is considered that the proposals will not have a significant adverse impact on any particular social group or community" (6.6).</p> <p>Further to the PSED analysis above, it is considered that the proposed CIL charges and zones in the DCS will not have any significant adverse impacts on any social groups, and in fact will have a positive impact when potential CIL-funded infrastructure schemes are considered.</p>	L	Neutral
Health	<p>The Localism Bill CIL Impact Assessment suggests that CIL will not "have an adverse impact on health" (page 25).</p> <p>Further to the PSED analysis above, it is considered that the proposed CIL charges and zones in the DCS will not have any significant adverse impacts on health, and in fact will have a positive impact when potential CIL-funded</p>	L	Neutral

		infrastructure schemes are considered.		
	Charities	<p>CIL (Amendment) Regulations 2014 Explanatory Memorandum “The impact on... charities or voluntary bodies is limited to those who develop land or own land that is developed. The changes improve flexibility in the application of the levy and update and add to both discretionary and mandatory reliefs from the levy” (para.10.1).</p> <p>It is acknowledged that charities can help advance equality issues for protected characteristics and groups.</p> <p>The mandatory exemption from CIL for charitable purposes will be applied as part of any borough CIL, as per the CIL regulations, and no difference in approach is proposed through the DCS.</p> <p>The council may propose at a later date to introduce a policy to allow the additional discretionary charitable relief although that is not currently part of this particular decision-making process for the DCS.</p>	L	Neutral
	Businesses / Developers / Landowners	<p>The Localism Bill CIL Impact Assessment considers that CIL will provide a number of benefits to businesses, developers and landowners, including:</p> <ul style="list-style-type: none"> • Simplicity; • Reducing risk and providing upfront certainty about liability; • Speeding up the development process; • Avoiding only the minority of (typically larger) developments contributing to the infrastructure needed to support growth as with the existing system of planning obligations; and • Avoiding rewarding developers’ ability to negotiate as with the existing system of planning obligations. <p>It goes on to conclude “We expect that any additional upfront costs on developers should be offset by the benefits...” (page 20); “We do not anticipate the Community Infrastructure Levy having an adverse impact upon fair and open business competition” and “This impact assessment therefore assumes that there will be a neutral effect overall in terms of the administrative burdens on</p>	L	Neutral

		<p>developers” (page 24).</p> <p>CIL (Amendment) Regulations 2014 Explanatory Memorandum states that “The impact on business... is limited to those who develop land or own land that is developed. The changes improve flexibility in the application of the levy and update and add to both discretionary and mandatory reliefs from the levy” (para.10.1).</p>		
	<p>Small and Medium Sized Businesses</p>	<p>The CIL Regulations Explanatory Memorandum states that the CIL legislation “applies to small businesses in the same way that it applies to larger businesses” (11.1).</p> <p>Both the CIL Regulations Explanatory Memorandum and the Localism Bill CIL Impact Assessment emphasise the provisions in the CIL Regulations which are partly intended to help small businesses, namely:</p> <ul style="list-style-type: none"> • The 100sqm threshold under which developments generally don’t give rise to a CIL liability, to ensure small developments do not pay CIL; • The £50 CIL liability threshold under which CIL liability is deemed to be zero, to avoid administrative costs associated with paying small amounts of CIL; and • The ability for charging authorities to introduce discretionary instalments policies to help with any cash flow issues. <p>The council may propose at a later date to introduce a policy to allow instalments although that is not currently part of this particular decision-making process for the DCS.</p> <p>The Localism Bill CIL Impact Assessment acknowledges that “as the Community Infrastructure Levy is payable on almost all new developments, there will be a small administrative burden on some developers who did not previously contribute towards infrastructure through section 106 agreements” (page 12). However, it goes on to state that “we would ultimately expect these costs, for small and big businesses alike, to be passed back to landowners through reduced prices for land” (page 24). It should also be noted that the 2014 amendment regulations introduced exemptions for residential annexes, residential extensions and self-builders.</p>	L	Neutral

Section 06	Reducing any adverse impacts
Outcome of Analysis	<p>The proposed CIL charges in the DCS are not considered to have any negative impacts on equality. When assessed, it has an overall a positive impact, particularly relating to the potential CIL-funded infrastructure schemes.</p> <p>It is therefore not anticipated that any specific actions will be needed to remove or mitigate against the risk of unlawful discrimination. However, despite this, the council will undertake the following actions set out in Section 07 Action Plan.</p>

Section 07	Action Plan					
Action Plan						
Page 273	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
	Need to ensure EqIA is robust	Ensure EqIA considered and consulted on in further stages of consultation	See Section 01	Sid Jha	More information and analysis on equalities impact	N/A
	Impact of CIL on cashflow of (small) businesses	Consider pros/cons of introducing a discretionary instalments policy	Prior to CIL Charging Schedule taking effect (see Section 01)	Sid Jha	Decision on whether or not to introduce a discretionary instalments policy	N/A
	Impact of CIL on charities where charities undertaking development for investment purposes	Consider pros/cons of introducing a discretionary charitable relief policy	Prior to CIL Charging Schedule taking effect (see Section 01)	Sid Jha	Decision on whether or not to introduce a discretionary charitable relief policy	N/A

Page 274	Impact of CIL on Discounted Market Sale (DMS) housing delivery	Consider pros/cons of introducing a discretionary social housing relief policy	Prior to CIL Charging Schedule taking effect (see Section 01)	Sid Jha	Decision on whether or not to introduce a discretionary social housing relief policy	N/A
	Impact of CIL on sites with exceptional viability circumstances, such as abnormal on-site costs and significant S106 contributions	Consider pros/cons of introducing an exceptional circumstances policy	Prior to CIL Charging Schedule taking effect (see Section 01)	Sid Jha	Decision on whether or not to introduce an exceptional circumstances policy	N/A
	Impact of CIL on borough development / viability and delivery of infrastructure	Monitor as part of Annual Monitoring Reports (AMRs)	In relevant AMRs after the CIL Charging Schedules takes effect (see Section 01)	Sid Jha / Sandrine Mathard	Information and analysis on impact of CIL	N/A

Section 08	Agreement, publication and monitoring	
Chief Officer sign-off	Name:	Nigel Pallace
	Position:	Executive Director, Transport and Technical Services
	Email:	nigel.pallace@lbhf.gov.uk
	Telephone No:	0208 753 3000
Key Decision Report	Date of report to Cabinet:	11 August 2014
	Equalities issues included:	Yes – section 8 of Cabinet report.

Appendix 8 PDCS Reps & Council Responses

The council must take into account representations on the Preliminary Draft Charging Schedule (PDCS) before it publishes the Draft Charging Schedule (DCS)¹.

Subsequently, the council has had further discussions with some of those who made representations (including early engagement with local developers and the property industry²) in order to clarify issues and assess the extent to which it was possible and appropriate to modify any aspect of the approach to determining charging rates – these are referred to as ‘Pre-DCS’ consultation responses.

All of the representations received and the council’s responses are detailed below and a summary of these sorted by issue is provided in Appendix 9.

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
PDCS	01.01	London Fire and Emergency Planning Authority (LFEPA)	Dron & Wright	LFEPAs sites within the borough: - Hammersmith Fire Station - 190/192 Shepherd's Bush Road, W6 7NL - Fulham Fire Station - 685 Fulham Road, SW6 5JJ	Fire safety infrastructure	Acknowledge further fire safety infrastructure background in Infrastructure Plan / IPS.
PDCS	01.02	London Fire and Emergency Planning Authority (LFEPA)	Dron & Wright	As fire stations are a vital community safety facility, we believe that they should be excluded from payment of this levy. The reasoning behind this is that fire stations are community safety facilities, which are included within the wider definition of 'infrastructure' under the Planning Act 2008. Therefore, any new development including the provision of a new fire station, will already be making a substantial contribution to the infrastructure which CIL is designed to fund. Furthermore, CIL payments will effectively result in double counting, impacting on the viability of a scheme which involves a new fire station within a development.	All uses unless otherwise stated Fire stations	There is no known requirement for a new fire station in the borough or evidence to show, if one was to be proposed, what effect the proposed CIL charge would be likely to have. It is possible for a charging authority to pass CIL onto other bodies, such as the fire service to assist in provision of facilities.
PDCS	01.03	London Fire and Emergency Planning Authority (LFEPA)	Dron & Wright	...we request that consideration should be given to the use of CIL funding for any future LFEPA fire safety and community facilities within the borough. Please note that LFEPA do not currently receive any Section 106 contributions, despite having requested them in the past via planning framework representations.	Fire safety infrastructure	Acknowledge further fire safety infrastructure background in Infrastructure Plan / IPS.
PDCS	02.01	Tuke Manton Architects LLP	-	The Government has introduced measures to encourage construction and new development. A strategy to add additional costs to planning applications will do the opposite. Surely, once a development has been constructed any additional space will either be subject to business rates or council tax. So this policy is just a further tax on deliverability development. I do not agree with this strategy in the slightest.	General viability and deliverability	This comment is about CIL in principle rather than the proposed charges.

¹ R15(7)

² G2:2:1:3; G2:2:2:4; G2:2:2:6

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Stage	Rep #	Organisation	Agency	Representation	Issue	Response
PDCS	03.01	Highways Agency	-	<p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We have reviewed the consultations and do not have any comment at this time.</p>	No comment	Acknowledged.
PDCS	04.01	Mayor's Office for Policing and Crime (MOPAC) / Metropolitan Police Service (MPS)	CgMs	<p>... [London Plan] Policy 7.13 states that Boroughs should work with stakeholders to ensure London remains resilient to emergency and the subtext states the Metropolitan Police should be consulted as part of major development proposals</p> <p>...</p>	Police infrastructure	Acknowledge further police infrastructure background in Infrastructure Plan / IPS.
PDCS	04.02	Mayor's Office for Policing and Crime (MOPAC) / Metropolitan Police Service (MPS)	CgMs	<p>...New policing facilities would therefore fall under all other uses and would be subject to a £80 per sq.m charge.</p> <p>By being subject to a CIL payment, policing floorspace would be prejudiced in being able to provide essential policing facilities contrary to the aims of the NPPF, London Plan and Core Strategy. It is therefore essential that CIL is not payable for new policing floorspace in the Borough which would take funding away from frontline policing.</p> <p>... There is... no doubt that policing is infrastructure... Therefore in providing community infrastructure (i.e. new policing facilities) which would attract a CIL liability, the MPS contribution to community infrastructure would effectively be double counted; on the one hand being charged CIL whilst on the other being a potential beneficiary. The provision of new floorspace is generally a consolidation of the estate therefore there is no greater impact on infrastructure than existing.</p> <p>Further, the Viability Assessment prepared by Roger Tym and Partners (August 2012) covers residential, offices industry and warehousing, retail, hotels, student accommodation, leisure and a range of 'sui generis' uses. The Assessment does not consider emergency services or policing facilities. There is no detailed justification for where the £80 per sq.m for all other uses has come from. All all uses cover such a wide range of uses, which would have very different levels of viability.</p> <p>It is suggested that the Charging Schedule should include the wording 'Development by police for operational purposes' as attracting a nil rate. Such an approach has been adopted elsewhere. [Examples from other charging authorities included: Bristol Submitted DCS; Huntingdonshire CS; Brent DCS; Sutton PDCS].</p> <p>For the above reasons, the MOPAC/MPS strongly recommend that, when formulated, applications for policing facilities attract a nil rate under the draft charging schedule.</p>	<p>All uses unless otherwise stated</p> <p>Police facilities</p>	<p>It is not clear that there are proposals for new build police facilities that would be likely to be liable for CIL; and no evidence to show how any such proposal may be prejudiced. It is possible for a charging authority to pass CIL onto other bodies, such as the police service to assist in provision of facilities.</p> <p>Police facilities are not exempt from the Mayor of London's CIL.</p>
PDCS	04.03	Mayor's Office for Policing and Crime (MOPAC) / Metropolitan Police Service (MPS)	CgMs	<p>In addition to the above, it is recommend that, when formally published, the list of beneficiaries of CIL (Regulation 123) includes policing facilities and that this includes a contribution towards policing where development would have a material impact upon policing provision in the Borough. This is consistent with the DCLG guidance - Community Infrastructure Levy: An Overview published in May 2011 which states that the levy van 'be used to fund a very broad range of facilities such as [inter alia] police stations and other community safety facilities' (Para 12).</p>	Police infrastructure	Acknowledge further police infrastructure background in Infrastructure Plan / IPS.

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
PDCS	05.01	Pocket	Rolfe Judd	<p>... Pocket is a private sector developer and provides intermediate housing for sale to singles and couples who earn too much to qualify for social housing, but not enough to buy on the open market. They have delivered over 140 intermediate units across London in the past four years.</p> <p>Based on current CIL Regulations it is considered that Pocket's innovative approach to the provision of intermediate affordable housing does not fall within the exemptions highlighted in the CIL Regulations 2010.</p> <p>The CIL Regulations allow boroughs... to set differential tariffs for different intended uses and different zones... Intermediate affordable housing schemes should be considered at a differential rate to private residential development.</p> <p>If Pocket (and other private sector intermediate housing providers) are not given a differential rate the ramifications of this will mean that schemes... will become uncompetitive against private developers or against Registered Providers (who are exempt from CIL). Pocket is unable to raise its sales and values and does not benefit from grant funding and would therefore be squeezed from both sides. This would mean that the delivery of intermediate housing across the borough would be impacted.</p> <p>We trust that... a differential rate of £0/sqm will be set for innovative forms of affordable housing which meet the NPPF definition.</p> <p>... 2.2... It is different from traditional forms of intermediate housing such as Shared Ownership in that the occupier owns 100% of their home from day one, no grant funding is required and 'stair-casing' does not occur as homes normally remain affordable in perpetuity. Pocket builds small developments based on efficiently designed one-bed homes with additional public storage and communal space in the form of courtyards and roof gardens. The typical Pocket site is a small infill or brownfield regeneration site in an accessible area...</p> <p>2.4 The GLA has confirmed that Pocket is affordable housing and we append a letter from Andrew Barry Pursell which confirms this.</p> <p>... 3.2 Pocket's homes are sold at an initial discount to the local market of at least 20% and their future affordability is governed through S106 and a lease which stipulates that the homes can only be on-sold to people on a household income of less than £60,000 p.a. - or whatever the affordability threshold as identified locally at the time of the sale...</p> <p>... 6.3 The scheme is for 32 units with ground floor level commercial of 310sqm. Based on Mayoral CIL of £50/sqm and the boroughs CIL of £200/sqm the following payments would be made..</p> <p><u>Mayoral CIL calculation</u> Existing floorspace: 415m2 Proposed Floorspace for New Scheme: 1,765m2</p> <p>Net additional floorspace: 1,350m2 (includes 310sqm of Commercial) Mayoral CIL Charge: £50/sqm</p> <p>Estimated Mayoral CIL owed: £67,500</p> <p><u>Borough CIL – Pocket Scheme</u> Existing floorspace: 415m2 Residential GIA: 1,455,2</p> <p>Net additional floorspace: 1,040m2 (excludes 310sqm of Commercial) Borough CIL Charge: £200/sqm</p>	Affordable housing: intermediate	Amendments to the CIL Regulations in February 2014, allow the Council to introduce discretionary social housing relief for accommodation that will, if sold, continue to be available to future purchasers at 80% of market price. If the Council introduces such relief Pocket would need to show that it meets the criteria.

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Stage	Rep #	Organisation	Agency	Representation	Issue	Response
Page 278				<p>Estimated Borough CIL Payment: £208,000</p> <p>Total CIL - £275,500</p> <p>6.4 This equates to nearly £9,000 per unit and represents an unacceptable burden on Pocket particularly as its unit price is restricted to make units affordable. Pocket's units cannot be sold for more than a maximum of £225,000 (i.e. 3.5 times the London Plan threshold of £64,300) or 80% against the local market, whichever is the lower. At the example site local comparatives suggest that a Pocket unit should be sold for £210,000. To add another £9,000 as a result of CIL would reduce the Pocket discount to market below 20%; it would also mean that Pocket would have to sell at the very top end of the London Plan threshold limit... and it would make it even harder for Pocket to meet boroughs income targets for intermediate housing.</p> <p>6.5 ...Other developers do not have this restriction and thus can increase sales values to assist viability. Registered Providers are exempt and thus can also compete. The CIL contribution noted above will therefore mean Pocket is unable to compete with other (non affordable) developers or Registered Providers...</p> <p>6.6 If Pocket was competing on a level playing field it could remain competitive as land price may reduce to take account of CIL, however, given the demand created by other developers land values are unlikely to fall and Pocket's margins will become unviable.</p> <p>...</p> <p>8.10 Any suggestion that land prices will fall to reflect the additional levy on development is without any factual basis or evidence and contradicts the evidence of land values in London over the past eight years since the introduction of a target of 50% affordable housing within the 2004 London Plan which have risen significantly.</p> <p>...</p> <p>8.16 We would propose that the boroughs Draft Charging Schedule should set a differential rate of £0/sqm for any affordable housing which does not fall within the Social Housing Relief as set out in the CIL Regulation 2010 but which meets the definition of affordable housing</p>		
	PDCS	06.01	London Play	-	<p>We welcome the inclusion by LBH&F of children's play in the Infrastructure Planning schedule of the proposals (sections L11, 15, 16, 17 - 23 and 32 – 38) and the acknowledgement of the importance of the GLA Children and Young People's Play and Informal Recreation Draft SPG to the proposals. We also welcome the positive contribution to their health attributed to children's play in the LBH&F Equalities Impact Assessment of the proposals.</p> <p>London Play has worked in partnership with the Play Association Hammersmith and Fulham (PAHF) to improve children's play throughout the borough. PAHF has worked with the council from 2007 to produce a local Play Strategy which formed an integral part of the (since abolished) Children's Plan. For details see: - http://www.playassociationhf.org.uk/page/play-strategy</p> <p>Children's informal play in public space forms an important part of the proposals to reduce the incidence of childhood obesity in many local plans, and London Play is working with the London Health Improvement Board to ensure play is acknowledged in a pan-London strategic framework to reduce childhood obesity.</p> <p>The significance of free, informal play with peers in public space in building resilience to counter the increase in depression, anxiety and mental illness in young people is also now well understood, for details see http://www.londonplay.org.uk/document.php?document_id=1429</p> <p>For both physical and mental health play is the prescription, and it is important to note that such play may take place anywhere in public space. Thinkers in the field have dubbed such places "playable space". We hope that this is borne in mind whenever new residential, public and recreation spaces and places are developed, as well as any proposals to restrict the speed and density of motor vehicle traffic in close proximity to residential areas (as set out in the DoT Manual for Streets). Both London Play and PAH&F will be happy to provide more information about our work and how we can help the planning department in this area if you want.</p>	Play infrastructure

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
PDCS	07.01	A2Dominian Group	Barton Willmore	<p>...A2Dominian are the freehold owners of land at Queens Wharf within the London Borough of Hammersmith and Fulham. The site is the subject of an extant planning application for redevelopment to provide 81 Use Class C3 (dwellinghouses) and 676 square metres (GEA) of Class A3 (Restaurant/Cafe) Use (LPA Ref: 2012/01985/FUL).</p> <p>The borough should ensure the viability appraisal has been properly and robustly carried out taking account of potential fluctuations in the market including the effects of developer confidence and availability of finance...</p>	Market fluctuations and availability of finance	Viability appraisals have been carried out properly and robustly.
PDCS	07.02	A2Dominian Group	Barton Willmore	<p>... The borough should also ensure they have fully justified their proposal to set different area and use class charges and that the estimation of future floorspace accurately takes account of the full range of chargeable developments and the types of applications which trigger CIL payments.</p>	Estimate of chargeable developments floorspace	This is considered to be properly justified.
PDCS	07.03	A2Dominian Group	Barton Willmore	<p><u>Clarity in Approach</u> It is noted from the Preliminary Draft Charging Schedule (para 1.2.13) that in addition to CIL, the Council is considering publishing a Planning Obligations SPD to set out further infrastructure contributions that, based on the Infrastructure Plan, are not to be funded by CIL. In our view this is contrary to the purpose of CIL. The Government clearly identify in Community Infrastructure Levy An Overview May 2011 that the benefit of CIL is to be a 'faster and more certain and transparent that the system of planning obligations which causes delay as a result of lengthy negotiations'. Moreover that levy rates will 'provide developers with much more certainty 'up front' about how much money they will be expected to contribute'. Introducing a further separate charging system through an SPD is entirely contrary to the intention of CIL.</p>	Planning Obligations SPD	CIL Regulations and Guidance do not rule out the continuing use of S106 obligations, subject to legal tests and pooling limits. The S106 SPD will not now be produced in advance of CIL though an outline of the scope of future S106 is included in the DCS consultation document.
PDCS	07.04	A2Dominian Group	Barton Willmore	<p><u>Forecast Supply</u> In setting the CIL charge, the Council should be seeking to review all opportunities for chargeable development and associated forecast supply. It is noted from paragraph 3.5.2 that the Council have not included the potential CIL income or infrastructure costs for Park Royal or Earls Court and West Kensington. In respect of Park Royal it is stated that this is on the basis that it is unclear whether this is going ahead as it is linked to Crossrail 2 (para 3.2.1). In relation to Earls Court and West Kensington the rationale is said to be set out in the Infrastructure Plan, however, unfortunately the relevant paragraphs are not available in the version on the Council's website.</p> <p>The statutory development plan comprises the London Plan 2011 and the Core Strategy 2011 both of which identify Park Royal as an Opportunity Area with associated growth in housing and other uses. It is therefore appropriate for the CIL charging to include this as potential income. The Council may wish to make the case the result is cost neutral as the cost of infrastructure is not included in the assessment; however this has not been tested.</p>	ECWKO: CIL income Park Royal: CIL income	<p>The Council and GLA are working to secure major regeneration of the Old Oak sidings area but the details are not yet included within the London Plan or the Local Plan. It is premature, therefore, to consider the implications for the current CIL proposals.</p> <p>In any event, CIL charges in the borough must be based on viability evidence.</p>
PDCS	07.05	A2Dominian Group	Barton Willmore	<p><u>Financial Viability</u> The Council are seeking to adopt differing CIL rates based on both area and use. The approach is complex and we would raise whether the evidence justifies this approach as the Council identify that the Viability Assessment is strategic, not focused on specific site calculations and involves 'a high degree of generalisation' (para 4.2.2). The Viability Assessment itself identifies that the calculations will have a 'high margin of variance from an actual site specific assessment' (para 2.8). Rather the approach seems to be to rely on overage as providing the necessary flexibility and 'headroom' to account for individual site circumstances (abnormal, S106 costs etc) without any assessment as to how with would work in practice or any worked examples.</p>	Generality of Viability Assessment	The PDCS was based on worked example appraisals. Nevertheless, additional sample appraisals have been used in the evidence base for the DCS.
PDCS	07.06	A2Dominian Group	Barton Willmore	<p>It is noted that the Viability Assessment states at paragraph 3.18 that the CIL charge is a relatively small proportion of total development costs and that a flexible approach on other policies such as density, design quality affordable housing and public open space will allow the Council to 'adopt a bespoke approach to individual schemes'. In short these assumptions and the effect of the CIL charge has not been adequately tested and is reliant on potentially compromising scheme quality. Given the disparities in charging rates for residential development based on area, there is a need for sensitivity testing to justify this approach, not rely on overage or flexible application of policy.</p>	Sensitivities: Density Design quality Affordable housing Public open	It is not realistic to sensitivity test the effect of all such potential factors that could affect the viability of individual schemes.

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Stage	Rep #	Organisation	Agency	Representation	Issue	Response
					space	
PDCS	07.07	A2Dominian Group	Barton Willmore	We would also query the assumptions used on the examples in respect of affordable housing. For example, the Viability Assessment is based on affordable housing being 40% however it is unclear from paragraph 3.9 what tenure split has been applied. Moreover it is understood from paragraph 4.2.3 of the Preliminary Draft Charging Schedule that the above is based on an assumption of no grant. Whilst the availability of grant is a factor that impacts on scheme viability, so too will be the actual tenure product as for example the Council's preferred tenure of Discount Market Sale would not be eligible for either grant or CIL Social Housing Relief and would therefore constitute a further cost to the scheme. The Viability Assessment does not address this issue.	Affordable housing: tenure split	The tenure split assumption is set out in Appendix B of the Viability Study. Discount Market Sale can be eligible for CIL Social Housing Relief where it satisfies the criteria in the regulations. Refer to CIL Collection information note. The Council will also consider whether to introduce discretionary social relief in accordance with the February 2014 Amendments to the CIL Regulations. In CIL the viability appraisals, it has been assumed that affordable housing would not pay CIL.
PDCS	07.08	A2Dominian Group	Barton Willmore	<u>Exceptional Circumstances</u> The CIL Regulations recognise the need for flexibility and provide for social housing and charitable relief. In addition there is provision for a charging authority to introduce further discretionary relief for exceptional circumstances (Regulation 55)... ... the charging authority has the option to make provision for relief for exceptional circumstances within their charging schedule. There is no mention of this in either the Viability Assessment of CIL Preliminary Charging Schedule. We would welcome a positive commitment in this respect.	Exceptional circumstances	It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.
PDCS	07.09	A2Dominian Group	Barton Willmore	<u>Instalments</u> The Viability Assessment recognises the need for CIL to be paid in instalments. We welcome the recommendation to introduce an instalments policy, however would welcome details. The 60 days from the commencement of the chargeable development default given in the CIL regulations is not always appropriate. Recognising the recession and responding by offering flexible payment options is supported.	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	07.10	A2Dominian Group	Barton Willmore	<u>Review</u> There are no details of when Hammersmith and Fulham is intending to review its charging schedule and under what circumstances the Council may reduce or increase its charge. Details of this should be provided along with details of how the CIL will be monitored, particularly as a proportion of the CIL will go towards the Collecting Authority's administrative costs.	Monitoring and review	Review of the CIL charges would depend on monitoring changing market conditions affecting development, in particular, key appraisal assumptions and the viability of schemes coming forward.
PDCS	08.01	Hogarth Architects	-	Having considered the contents of the CIL charging structure, I would say that the majority of our clients will find these charges too high. If they were instead of affordable housing quotas then fine, but the two together are too big a cut. Most developers we deal with are currently happy to get a 15% return on investment. With new housing costing say £1800 psm a rise to £2250psm in our opinion is not sustainable and will lead to much less development when developers are nervous in any case. We feel that this will add to the pressure causing housing shortages and is ill considered. It will make more schemes less profitable, in a market where funding is already hard to get. The reality will be diminishing returns, and ongoing housing shortages, I think the basis of the charges are returns that are no longer typical in this climate. A serious re think is necessary I would say that a charge more equal to the mayoral charge (£50psm) is more sustainable.	General viability and deliverability	This example refers to the PDCS proposed £400/m ² CIL charge in the south zone. In a development which provides affordable housing in accordance with policy CIL would only be charged on 60% of residential floorspace. Therefore the average impact over all floorspace would be £180/m ² . It is erroneous to compare CIL with build costs alone as there are many other development costs that need to be taken onto account in considering the

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
						impact of CIL on viability.
PDCS	09.01	Tesco	GL Hearn	<p>As a major investor and developer in Hammersmith and Fulham, Tesco have significant experience in bringing forward development including retail, residential and mixed use developments.</p> <p>In order to ensure that future development is viable and deliverable, Tesco are concerned to ensure that the Community Infrastructure Levy does not, in accordance with the Regulations, put at serious risk the overall development of the area.</p> <p>Tesco have therefore reviewed the Preliminary Draft Charging Schedule to seek to ensure that an appropriate balance has been struck between the desirability of funding infrastructure from the levy and the potential effects of the levy upon economic viability of development across the borough.</p> <p>Having reviewed the Preliminary Draft Charging Schedule, Tesco is concerned that the balance may not have been struck in relation to food retail and residential charges, and that the evidence may not fully justify the approach currently proposed.</p>	<p>All uses unless otherwise stated</p> <p>Food retail</p>	<p>No detailed evidence has been provided to support the assertion that a balance may not have been struck.</p> <p>The viability appraisals have been reviewed and the Council considers the appropriate balance has been struck.</p>
PDCS	09.02	Tesco	GL Hearn	<p>Tesco are keen to share the benefit of their significant experience to ensure that the CIL does strike the appropriate balance. Tesco would therefore welcome the opportunity to meet with you to discuss these issues in advance of the preparation of your Draft Charging Schedule, and looks forward to reviewing the Draft in due course.</p>	Meeting	Meeting held
PDCS	10.01	Sainsbury's	Turley Associates	<p><u>Lack of Evidence</u></p> <p>Regulation 11 of the CIL Regulations require charging authorities 'to demonstrate' the proposed CIL rates are informed by both appropriate and 'relevant evidence'. The Viability Report (see Appendix 4) provides only two residual appraisals for both comparison and convenience retail uses, with minimal justification given. Such lack of sampling may well put at risk retail (and other related development) within the borough, being both poorly evidenced and currently unrepresentative of local market conditions.</p>	<p>All uses unless otherwise stated</p> <p>Comparison and convenience retail</p>	<p>Sampling is considered to be appropriate at borough level and is representative of local market conditions.</p>
PDCS	10.02	Sainsbury's	Turley Associates	<p><u>Instalments Policy</u></p> <p>In order for the requirements of CIL not to affect the long-term delivery of retail development within the borough, Sainsbury's consider it essential the Hammersmith and Fulham also prepare and adopt an instalments policy in line with CIL Regulation 69B. If all CIL is payable at the commencement of a development process then that might affect viability. Further clarification will therefore be required within the Draft Charging Schedule so that the financial consequences can be modelled.</p>	Instalments	<p>The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.</p>
PDCS	10.03	Sainsbury's	Turley Associates	<p><u>Exceptions Policy</u></p> <p>In addition to adopting an instalments policy, Sainsbury's suggest that the Council also adopt a policy which would provide for the Charging Authority to offer discretionary relief from the CIL payments.</p> <p>Sainsbury's considers it essential that the Council retains the opportunity for such an agreement to be reached in particular circumstances and welcomes the drafting of an exceptions policy in preparation for the next round of consultation.</p> <p>We trust the above points are helpful and look forward to reviewing the Draft Charging Schedule when published in due course.</p>	Exceptional circumstances	<p>It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.</p>
PDCS	11.01	Marks and Spencers	Nathaniel Lichfield & Partners	<p>Whilst Marks and Spencer see the Preliminary Draft Charging Schedule as being most useful in helping understand the Council's emerging position with regards to introducing the Community Infrastructure Levy (CIL) in the Borough, our client has asked us currently to refrain from commenting in detail at this initial stage, and to reserve the Company's right to comment fully on proposed CIL rates, once further critical evidence base material and other information has been published.</p> <p>We are given to understand that the second draft of the White City Opportunity Area Planning Framework/ Supplementary Planning Document (SPD), and the Development Infrastructure Funding Study (DIFS) for the White</p>	WC DIFS: General	Noted

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				<p>City Area, are both due to be released for consultation later in the year. It will be imperative that their content (and the outcomes of the respective consultations on each one) is used in turn in developing the revised proposed CIL rates in the Borough. We understand that it is currently proposed that the consultation on the Borough's Draft Charging Schedule is due to take place this winter therefore the timings should ensure that the Schedule can reflect these new elements of the evidence base for the Borough's CIL; our client considers this coordinated timing to be essential, as the content of, findings from, and consultation responses to the emerging SPD and the DIFS must all be taken into consideration and reflected fully in the Draft Charging Schedule.</p> <p>Marks and Spencer will therefore await the publication of the second consultation draft of the SPD, and of the DIFS, and any further information that the Council intends to form part of the evidence base for the Charging Schedule, before considering commenting in detail on the Borough's proposed CIL rates etc.</p>		
PDCS	12.01	Aviva and Helical Bar	Jones Lang LaSalle	<p>In the draft, the approach, the evidence base and the way in which the research has been applied are all defective and further consideration needs to be given to the Preliminary Draft Charging Schedule before it is taken any further. The principal areas of objection are as follows.</p> <p><u>The Approach</u> The evidence base for assessing the Preliminary Draft Charging Schedule has been undertaken in the following three component parts:</p> <ol style="list-style-type: none"> 1 The South Fulham Riverside Development Infrastructure Funding Study undertaken for this southern part of the Borough, by Jacobs, CGMS and Cushman & Wakefield. 2 The White City Opportunity Area Development Infrastructure Funding Study for this northern part of the Borough undertaken by AECOM, Drivers Jonas Deloitte and Davis Langdon. 3 The work undertaken by Roger Tym & Partners for the rest of the Borough. <p>However, only the Roger Tym work has been used to inform the Preliminary Draft. Paragraph 2.2.5 of the Preliminary Draft Charging Schedule explains the Council's approach by stating that "any published DIFS will be able to inform future stages of the emerging Borough CIL as appropriate, for example, at the Draft Charging Schedule (DCS) stage".</p> <p>However, the detailed work that has been carried out in other parts of the Borough has to be taken into account now, to inform the appropriate CIL rates. Whilst charging authorities can levy different CIL rates in different parts of the Borough, this cannot simply be based on different policy areas and needs instead to be on the basis of different levels of viability. If the evidence on viability does not support a different approach being taken, then differential charges cannot be set.</p> <p>The evidence base undertaken for the different parts of the Borough need to be taken into account and further progress on the CIL cannot be made until all the information is available and has been considered.</p>	<p>WC DIFS: General</p> <p>SFR DIFS: General</p>	<p>The WCOAPF DIFS has been taken into account in part in arriving at the revised proposals affecting White City East in the DCS.</p>
PDCS	12.02	Aviva and Helical Bar	Jones Lang LaSalle	<p><u>The evidence base for assessing viability</u> The Government's guidance on the "Community Infrastructure Levy – An Overview May 2011" explains in paragraph 23 that charging authorities wishing to introduce the levy should propose a rate which does not put at serious risk the overall development of their area. It goes on to explain that evidence needs to be used to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential effects of the levy upon the economic viability of development across their area.</p> <p>Whilst it is for the charging authority itself to decide where to strike that balance, the fundamental premise is that CIL must be set at a level that does not put at risk the overall level of development in an area.</p> <p>In this case, the viability research upon which the Council is relying when making this judgment, seriously overestimates the viability of development. As such, the Council is simply unable to determine where an appropriate balance lies. By proceeding with the unsound information that is before it, the Council will put at risk development not just at the margins of economic viability, but across the major regeneration sites upon which it is relying to provide its necessary housing supply. Much of the Borough's housing supply is in large sites to the northern part of the Borough.</p>	<p>General viability and deliverability</p>	<p>The DCS evidence includes appraisals of sample schemes on larger sites as well as those used for the PDCS stage.</p>

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				Therefore, to illustrate the deficiencies in the viability work undertaken, the example provided by Roger Tym & Partners for a 50 unit scheme in the north zone is examined below.		
PDCS	12.03	Aviva and Helical Bar	Jones Lang LaSalle	1 Base land values – the single most significant factor that overestimates viability is the assumption that current land values are some £2-10 million per hectare. Even in the northern part of the Borough, development land cannot be acquired so cheaply. This range is significantly below even existing use values and as such, no land would be brought forward for redevelopment. In Appendix 4.6 in Roger Tym's assessment of the 50 unit scheme, the appraisal to demonstrate viability is based on just over £5 million per hectare. By way of comparison, the Council and the GLA's consultants, AECOM and Drivers Jonas Deloitte, who have assessed the White City area in the northern part of the Borough in considerably more detail, have advised the Council that the base land value is £9.27 million per hectare. We have pointed out previously that even this AECOM/Drivers Jonas figure is a substantial underestimate and well below the clear market evidence that exists in the area. However, even if the AECOM/Driver Jonas figure that they have provided to the Council and GLA is fed into the proposal, the profit suggested by Roger Tym in the 50 unit scheme of just over £2 million would actually be around only half a million, which would make the scheme unviable, providing an inadequate return for the risk and capital that would need to be deployed of just 4.5% profit on cost, compared with the 20% needed. As pointed out above, AECOM and Drivers Jonas underestimate significantly the base land values. Had a true land value been applied, then the appraisal would show a substantial loss. In either case, whether one uses figures supplied to the Council by AECOM/Drivers Jonas, or what is known to be the true base value, then correcting this one single factor alone shows that the 50 unit development in the northern part of the Borough would be unviable, and not able to support any levy. The viability position is worsened yet further by other over optimistic assumptions as set out below.	Land values WC DIFS	The Viability Study uses revised benchmark land values. In particular, the figure for White City East is £14M/hectare.
PDCS	12.04	Aviva and Helical Bar	Jones Lang LaSalle	2 Construction costs – an overall construction cost of £1,900 per sq m is used in the appraisal in Appendix 4.6. Whilst this figure in isolation may appear acceptable for residential development, it is an all encompassing rate and needs to include a variety of things including the provision of access, basements, public realm and landscaping. By way of comparison, a detailed cost report by specialists E C Harris has been undertaken for the 1,150 unit scheme that is the subject of an application on the former Diary Crest site that lies within the north zone. The total construction cost breaks down to £2,616 per sq m. If this more realistic figure is applied to the appraisal in Appendix 4.6, then the construction cost would be some £8.45 million compared to the £7.22 million being suggested. The use of this more realistic construction cost would on its own erode all of the profits and the scheme would result in a loss of over £1 million. This shows that by correcting just this one factor alone, the 50 unit scheme in the northern part of the Borough would be unviable, and not able to support any levy.	Build costs	The approach to cost figures is explained in Appendix A of the Viability Study. An additional 5% on costs is included for plot externals in the appraisals accompanying the Viability Study.
PDCS	12.05	Aviva and Helical Bar	Jones Lang LaSalle	3 Demolition – the allowance for demolition of just £25,000 in the appraisal in Appendix 4.6 is a nonsense. Whilst it clearly depends on the extent of any structure that needs to be demolished, £100,000-£200,000 is likely to be a much more realistic range.	Demolition	It would be expected that demolition costs would be reflected in the price paid for development sites so that they could cost less than the benchmark land value. This approach was taken in the WCOA DIFS study.
PDCS	12.06	Aviva and Helical Bar	Jones Lang LaSalle	4 Professional Fees – the illustrative proposal in Appendix 4.6 makes an allowance for just 8% for professional fees. The universally accepted allowance for all professional fees of some 12% should be made.	Professional fees	Professional fees are based upon accepted industry standards. For the DCS the rate has been increased from 8-10%.
PDCS	12.07	Aviva and Helical Bar	Jones Lang LaSalle	5 Other Fees/Costs – no allowance has been made for a range of other costs such as surveys, planning fees, Council charges, building regulations etc, all of which would be on top of the allowance for professional fees and would further undermine the viability.	Other fees	Professional fees relate to the costs incurred to bring the development forward and cover items such as; surveys, architects, quantity surveyor etc.
PDCS	12.08	Aviva and Helical Bar	Jones Lang LaSalle	6 Finance costs – although the rate of 7% is appropriate, the resultant finance costs seem to be an underestimate due to the other assumptions that will have been made on construction periods, payment dates etc, but which have not been made publically available.	Finance costs	Information on phasing of construction and sales is set out in Appendix A of the Viability Study.

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PDCS	12.09	Aviva and Helical Bar	Jones Lang LaSalle	7 Borough CIL – the illustrative appraisal makes no allowance for the suggested levy of £100 per sq m in addition to the mayoral CIL. Without such an allowance being made in the example provided (and ignoring all the errors set out above), it is suggested that a profit on cost of 20% can be achieved, with just under 17% profit on gross development value. The Borough CIL alone would erode about a tenth of the overall return and hence the CIL in isolation reduces the profits to a level below that that is required.	Profit	Revised sample appraisals for White City East are included in the Viability Study.
PDCS	12.10	Aviva and Helical Bar	Jones Lang LaSalle	8 Requirement for Other Uses Ignored – the illustrative example makes no allowance for the fact that most schemes of this size would be required to make provision for other uses as part of the overall development, which invariably require cross subsidising from the residential element, thereby reducing overall profitability.	Mixed uses	The sample viability appraisals for the DCS include large mixed use schemes.
PDCS	12.11	Aviva and Helical Bar	Jones Lang LaSalle	9 Abnormals – invariably most development sites have abnormalities that have to be addressed (as distinct from the contingency allowed for in the construction cost which is normal). However, no allowance has been made in the figures that the Council is seeking to rely upon.	Abnormals	The Viability Study methodology expects that abnormal costs would be reflected in the land costs, therefore, they would effectively reduce the Benchmark Land Value. The WCOA DIFS also took this view which is clearly stated on pages 42/43. However, the Viability Study methodology allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the overage, since only a small proportion is taken for CIL.
PDCS	12.12	Aviva and Helical Bar	Jones Lang LaSalle	The concerns set out above in respect of the flaws in the viability analysis are fundamental. It is clear that the conclusions reached grossly overestimate the viability of development in the northern zone, even in the absence of CIL. It is clear that the 50 unit scheme in the north of the Borough is not viable and hence unable to support a levy. The base research upon which the Council is relying in informing the appropriate CIL rates therefore needs to be reconsidered in the northern part of the Borough; otherwise the regeneration sought by the Council will be made unviable by the rates suggested.	General viability and deliverability	The DCS evidence includes appraisals of sample schemes on larger sites as well as those used for the PDCS stage.
PDCS	12.13	Aviva and Helical Bar	Jones Lang LaSalle	<u>The Application of the Viability Analysis to the Proposed CIL Charging Rates</u> In addition to the viability concerns outlined above for residential development, the proposed charging rates for other uses have little or no research upon which to be based. The two main areas of concern are as follows: Uses within Use Class D1 – the proposed charging schedule applies a nil rate for health and education, which paragraph 4.3.1 of the Preliminary Draft Charging Schedule says “are not sufficiently viable to support a CIL payment”. Other uses within Use Class D1, including a wide range of community uses are also not viable and indeed are often required as part of development proposals and form part of the “planning gain”. Such community uses generate a negative value and need to be cross-subsidised. As such, it is self evident that there is no “extra” or “super” profit generated by these uses that can pay for a levy. If the provision of such onsite community facilities is to be taxed, then it is even more unlikely that they will be provided. It is requested that the Draft Charging Schedule be amended so that health and education be widened to include all uses within Use Class D1.	Mixed uses D1 uses	This comment refers to development in White City East where the DCS proposes a £0 charge for all uses.
PDCS	12.14	Aviva and Helical Bar	Jones Lang LaSalle	All other uses – the Preliminary Draft Charging Schedule suggests a charging rate of £80 per sq m for all other uses. There is simply an insufficient evidence base to justify this charge on other uses in the northern zone. Whilst the work by Roger Tym does undertake some limited viability appraisal work for specific other uses such as large scale retail and a hotel, many of the figures are again undermined by some of the assumptions made, similar to those outlined earlier in respect of the residential appraisals. Furthermore, there are a raft of other uses such as a range of leisure activities and specialist uses that have simply not been considered at all and in the absence of any analysis it cannot be concluded that a levy of £80 per sq m can be supported without harming viability to an unacceptable degree.	Other uses	The Viability Study gives further consideration to other uses.
PDCS	12.15	Aviva and Helical Bar	Jones Lang	<u>The Charging Zone</u> The detailed and specialist works that AECOM and Drivers Jonas undertook for the White City area on behalf of the	WC DIFS: Rates	The DCS sets out a revised approach to White City East.

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			LaSalle	<p>Council and the GLA concludes that within the wider White City area, all other uses could not viably support any tariff and the Council has been recommended to adopt a nil rate. This clearly directly conflicts with the £80 per sq m being suggested in the Preliminary Draft Charging Schedule. Having undertaken this detailed work, the AECOM and Drivers Jonas findings and advice in respect of 'other uses' should be followed. Indeed, the AECOM/Driver Jonas work in White City suggests that different levels of viability do exist across the Borough and it is requested that both:</p> <p>(i) the rate for all other uses is reduced to nil; (ii) a separate charging zone for White City is adopted.</p>		
PDCS	12.16	Aviva and Helical Bar	Jones Lang LaSalle	<p><u>Other Considerations</u> It is requested that the following two points are taken into account in respect of sub-section 5.5 of the Preliminary Draft Charging Schedule. Paragraph 5.5.1 explains that the Council has not decided whether to introduce an installment policy. In view of the fact that Hammersmith & Fulham Council has five regeneration areas, which include major sites whose redevelopment will be phased over many years, it is vitally important that payments can be made in installments. Otherwise this regeneration will not be delivered, as the larger schemes will not be able to bear all the costs up front. We ask therefore that the final CIL Charging Schedule allows for payments to be made in installments where development is to be phased.</p>	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	12.17	Aviva and Helical Bar	Jones Lang LaSalle	<p>Second, on an entirely different matter, the final CIL Charging Schedule must explicitly allow for relief from the levy to be given in exceptional circumstances where a scheme cannot afford to pay the levy.</p> <p>The regulations specifically allow charging authorities the option of giving such relief, providing the CIL Charging Schedule allows for it. Given the importance of ensuring that the levy does not prevent otherwise desirable development, we ask that provision within the Charging Schedule is made to allow such exceptional circumstances to be taken into account.</p>	Exceptional circumstances	It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.
PDCS	13.01	Berkeley Group	Quod	<p>Berkeley has several land interests in the Borough including St. George's consented developments at Chelsea Creek and Fulham Reach and the proposed development at Kings Mall, which is currently at the pre-application stage, and St James' interests at Carnwath Road and Lime Grove Mews. Together these represent over 1,500 homes in the Borough's future housing pipeline.</p> <p>...It is essential that the introduction of the Community Infrastructure Levy does not frustrate the development process or place an unsustainable burden on future development which would undermine the Council's ability to meet its housing target of 615 dwellings per year.</p> <p><u>General Evidence Base and Approach</u> The Council appears to have broadly followed the requirements set out in "Community Infrastructure Levy Guidance: Charge setting and charging schedule procedures".</p> <p>The approach to infrastructure planning appears comprehensive but we believe that more use should then be made of this work in considering the viability and deliverability of key development areas. We have some concerns about the approach to viability testing as the typologies that have been assessed don't appear to reflect properly the actual development pipeline, and consequently the conclusions may be unsound. We will expand on these points further below.</p> <p>In general we have a concern that the Charge Setting Guidance has been taken by many authorities as encouraging relatively light-touch high level viability assessment, with infrastructure planning principally for the purposes of demonstrating a viability gap rather than a focus on supporting delivery.</p> <p>We believe that it is important for the local authority to give consideration to large housing and mixed use sites, which are likely to have a combination of Section 106 obligations, including site specific mitigation and affordable housing, and policy requirements as well as CIL requirements. In particular it would be helpful for both the Council and developers to understand the likely combined weight of obligations in deciding whether the proposed CIL levels are appropriate.</p>	General viability and deliverability	The DCS evidence includes appraisals of mixed use sample schemes on larger sites as well as those used for the PDCS stage.

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				<p>This would address references in the guidance to the need to understand implications for development plan priorities (para 7), the potential for site sampling where there may be an impact on viability (para 25), evidence of impacts on residential development, including the SHLAA and housing pipeline (para 26), and the impacts of other development costs including Section 106 and affordable housing on viability (para 28). The latter point is re-emphasised in paras 173 to 177 of the NPPF.</p> <p>We believe that the work undertaken to support the development of the Preliminary Draft Charging Schedule provides a good basis on which to do this but would encourage the Council, prior to the production of the Draft Charging Schedule, to engage with local house-builders and developers to address the issues arising for sites that underpin the Council's housing pipeline.</p>		
PDCS	13.02	Berkeley Group	Quod	<p><u>Infrastructure Planning Schedule</u> We are pleased that in relation to infrastructure planning the Council has gone well beyond the minimum and provides a comprehensive assessment of likely infrastructure needs and funding sources. Our view is that in the next stage of the work this needs to work through into the Viability Assessment, and also some more explicit statements about the likely scale and scope of Section 106 and Affordable Housing contributions.</p> <p>It would be useful if the Council could refine the list in Appendix 2 of the Infrastructure Planning Schedule. At present Figure 3.2 of the Charging Schedule assumes approximately a 5:1 ratio of CIL to S106, which would equate to S106 being an additional 20% on top of CIL. Whilst it is appreciated that the table was principally produced for the purposes of demonstrating a funding 'gap' rather than assessing residual Section 106 requirements, it implies a relatively significant level of funding will continue to be sought from Section 106 agreements. It would therefore be useful to understand which of the items are priorities and meet the necessity test, as set out in Regulation 122 of the CIL regulations.</p> <p>This is of particular significance for those sites located in the "Regeneration Areas" identified in the Council's Core Strategy and for which additional policy requirements apply. Much of the information on the South Fulham Riverside area, for example, is sourced from the Delivery and Infrastructure Funding Study (2012) which has been incorporated into draft policy guidance for the area. This includes (Chapter 14) an infrastructure list which it suggests will be funded by a combination of CIL and Section 106 contributions. Given that these are clearly policy obligations with costs which should be taken into account in the Charge Setting process it would be useful for the Council to confirm the anticipated split and ensure that they are factored into the viability assessment for the southern part of the Borough.</p>	S106 costs	The approach to future S106 is explained in the DCS documentation.
PDCS	13.03	Berkeley Group	Quod	<p>We welcome the Council's commitment to produce a draft Section 106 SPD to be consulted on in advance of the CIL examination and believe that the work described above could usefully feed into this.</p>	Planning Obligations SPD	Support noted. However, the SPD will not now be produced in advance of CIL though an outline of the scope of future S106 is included in the DCS supporting document.
PDCS	13.04	Berkeley Group	Quod	<p><u>Viability Assessment</u> At present we do not consider that the typologies used in the viability assessment reflect the types of developments that form the Council's housing pipeline. This is of significant concern as it is at present unclear whether the inputs to the model – on build costs, Section 106 requirements and other items – are appropriate and therefore whether the outputs from the model are reliable.</p> <p>...</p> <p>The current assessment uses only two typologies – of 10 and 50 homes - in each of the three sub-areas. The most recent monitoring report however suggests that 90% of the Council's five year supply is on developments of more than 50 homes, and over half (55%) on 10 developments with over 250 homes. We would suggest that the Council therefore needs to test at least two more typologies for larger sites – with explicit consideration of site specific Section 106 and Affordable Housing Requirements and any required 'mixed use' elements (affordable workspace, community space).</p>	Large sites Mixed uses	The Viability Study has an expanded range of sample sites that includes two large mixed use schemes in each zone.
PDCS	13.05	Berkeley Group	Quod	<p>The Council's policies, which place a range of requirements and obligations upon development are set out in a number of documents.</p> <p>These include the Core Strategy (2011) which sets out a range of additional policy requirements for each of the</p>	S106 costs and other policy costs	The policy requirement for affordable housing is taken into account in the CIL viability appraisals.

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				<p>regeneration areas. These include affordable housing, employment based uses as part of mixed use developments, investment in open spaces and leisure uses (including the riverside walk), high quality design standards, contributions to public transport accessibility and highway capacity and strategic and local policies in relation to carbon reductions and climate change.</p> <p>For the three largest Regeneration Areas the Council has undertaken assessments of infrastructure requirements and produced Supplementary Planning Documents. In the case of South Fulham Riverside this is in Draft form (March 2012).</p> <p>The Council has also produced a range of other Supplementary Planning Guidance and a Submission Draft Development Management DPD (July 2012), setting out detailed standards and requirements expected from developments.</p> <p>The combined weight of these standards and obligations means that it is likely that standard build costs will not be appropriate and that there will be a significant residual Section 106 requirement for major developments if they are to demonstrate that they are consistent with policy and have mitigated their impacts.</p>		<p>Appraisals for the DCS now include a 5% on cost allowance for plot externals.</p> <p>Appraisals now include a £1,000 per private dwelling S106 costs. However, it is recognised that in some cases there may be additional significant S106 requirements which would need to come out of the overage identified in the viability study; albeit, many S106 purposes would in future be funded through CIL. This possibility is taken into account when considering how much of the overage could fund a CIL charge.</p>
PDCS	13.06	Berkeley Group	Quod	The Council should test the inputs to this with developers and with recent development appraisals undertaken in the Borough...	Recent/historic S106s and appraisals	The Council has carried out an examination of a large number of schemes to compare S106 with theoretical CIL and has concluded that the proposed CIL charge rate are reasonable in comparison. See DCS supporting document.
PDCS	13.07	Berkeley Group	Quod	...Our review of inputs to the model suggests, for example, that assumed build costs for apartments may be too low for the higher value areas of the Borough...	Build costs	The approach to cost figures is explained in Appendix A of the Viability Study.
PDCS	13.08	Berkeley Group	Quod	...Other assumptions need to be made explicit. For example, the source of the benchmark land values referred to in para 4.3 and subsequently used in the tables to compare to development values is not clear...	Land values	The approach to benchmark land values is explained in Appendix A of the Viability Study.
PDCS	13.09	Berkeley Group	Quod	...Similarly Section 106 assumptions could be made explicit and separated from the catch all 'site preparation and infrastructure' heading.	S106 costs	The site preparation and infrastructure heading is for costs, additional to base build costs, within the development and not S106 contributions to infrastructure.
PDCS	13.10	Berkeley Group	Quod	<p>The Council should also use recently consented developments as appropriate available evidence to reality check its emerging rates. The proposed rates in the southern zone, assuming 75 sqm per private home, would equate to a total CIL requirement of £33,750 per home, comprising £30,000 LBHF CIL and £3,750 Mayoral CIL. If residual Section 106 obligations were one fifth of CIL, in line with the high level assumption in Figure 3.2 of the PDCS, this would equate to a further £6,000 per home, giving a total obligation of just under £40,000 per home. The viability assessment assumes that this could be delivered alongside 40% affordable housing.</p> <p>In comparison we have undertaken an analysis of consented major developments in the last two years in the south area of the Borough, from the Molior database, a commercial database of planning consents on major residential developments in London. These developments, comprising 1,700 homes, are delivering approximately 24% affordable housing and around £28,000 Section 106 per private home. This would suggest that the proposed CIL rates could place too great a burden on development and that they would put at risk the delivery of large developments in strategic locations within the Borough which comprise the large majority of the Council's housing supply.</p>	Recent/historic S106s and appraisals	The presumption on residual S106 is speculative.
PDCS	13.11	Berkeley Group	Quod	<p><u>Conclusions</u></p> <p>Without further clarity on the residual policy and infrastructure requirements and an assessment of larger site typologies it is difficult at present to form a judgement on the appropriateness of the proposed charges, but comparison to the combined affordable housing and Section 106 requirements on recent developments suggests that they could significantly add to overall burdens on development.</p>	General viability and deliverability	The DCS evidence includes appraisals of mixed use sample schemes on larger sites as well as those used for the PDCS stage.

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				We would suggest that it is essential for the Council to undertake some additional viability assessment on larger developments to better reflect the Council's likely development pipeline, and consult with local landowners and developers on the input assumptions prior to the assessments being undertaken.		
PDCS	13.12	Berkeley Group	Quod	As important for major sites is clarity on the overall combination of likely requirements, including those from the Infrastructure Delivery Plan as well as other policy requirements. Clarity on these issues would inform the development of the revised SPD on Planning Obligations and the Council's Regulation 123 list, and the earlier this is done the better as it will allow informed response to the proposed CIL charging levels.	Planning Obligations SPD R123 List	Comment noted. An outline of the scope of future S106 is included in the DCS supporting document.
PDCS	13.13	Berkeley Group	Quod	As you will be aware there is limited flexibility in revising a Draft Charging Schedule after it has been published, and changes are discouraged prior to examinations. Therefore, if the Council is minded to undertake the additional work described above we believe that it would be useful for all parties if there is a further round of informal consultation to allow feedback prior to publication of the Draft Charging Schedule.	Meeting	Meeting held
PDCS	14.01	Greater London Authority	-	<p>We are pleased to note that the Mayor's CIL was taken into account by Roger Tym and Partners in their Viability Assessment and subsequently in the rates proposed in your preliminary draft schedule as required by regulation 14(3) of the Community Infrastructure Levy Regulations 2010 (as amended).</p> <p>There are two areas in which the Viability Assessment may be open to misinterpretation. The first is in the approach taken by the consultants is establishing a "standard charge" and then looking at whether variations on this are justified in particular cases. The Regulations are clear that the correct approach is to identify the "right" level of charge for particular uses and areas. One that could be presented as establishing a baseline rate with "concessions" in particular cases could provide the basis for arguments that your proposals involved State Aids. As you may know, we faced arguments of this kind at the examination of the Mayor's draft charging schedule (it was an issue on which we took counsel's opinion), and it is clear from discussions with many in the development sector that the distinction between a differential rate and a partial exemption is not understood. You may want to discuss this presentational point with your consultants before you bring forward your draft charging schedule; I would be glad to discuss this point further if it would be helpful.</p>	All uses unless otherwise stated	The approach has been reviewed.
PDCS	14.02	Greater London Authority	-	There are two minor points we would make on the Viability Assessment, neither of which affect the central judgement. As you know from previous discussions, it may be a little sweeping to say (para. 4.7) that no discount market sale housing can benefit from social housing relief...	Affordable housing; discounted market sale	This will be reviewed in the light of recent changes to the CIL Regulations affecting social housing relief.
PDCS	14.03	Greater London Authority	-	...And while what is said in paragraph 4.79 is true, it may be worth being clear that this has not been a consideration in setting the differential rate as it is not strictly a viability-based factor.	Health / education / industrial / warehousing	Agreed. Reference has been removed.
PDCS	15.01	Valad Europe	Indigo Planning	<p>VALAD Europe ('Valad') is the freeholder of both Fairfax House and Grayton House which, although adjacent, are located at 461-465 North End Road and 498-504 Fulham Road respectively, within Fulham Town Centre.</p> <p>Valad are actively considering future options with regard to these properties given the challenging commercial property market in locations such as Fulham Town Centre. The implementation of CIL in the Borough and potential impact on the viability of any future proposals is therefore of great interest to Valad who wish to ensure that any tariff is implemented fairly and appropriately.</p> <p>...</p> <p>We have identified both of our client's properties as being marginally within the 'Central B' charging zone. We are satisfied that the Council has, in defining four geographical charging zones without undue complexity, considered economic viability and has been mindful of local conditions. Both Fairfax House and Grayton House are within Fulham Town Centre and the Fulham Regeneration Area as designated with the Council's Core Strategy (October 2011). As alluded to above, although Fulham is an outwardly successful town centre with various retail, commercial and leisure functions, it is susceptible to the challenge of more high profile town centre locations such as Shepherd's Bush (Westfield London) and the nearby Kings Road. Because of the relatively polarised social, physical and economic nature of the town centre, development would have much narrower margins of economic viability than the adjacent 'South' charge zone. Therefore we would wish to see the existing charge zone boundaries maintained as proposed</p>	Residential Central B Zone	Support for retention of Residential South Zone charging boundary acknowledged.

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				which we note replicate the southern boundary of the Regeneration Area.		
PDCS	15.02	Valad Europe	Indigo Planning	In terms of Charge rates we welcome the zero charge in regard to Office development (Class B1a/b). This will assist the office market in Fulham Town Centre.	Offices: Central B	Support noted.
PDCS	15.03	Valad Europe	Indigo Planning	We note the charge rate of £200 per sq metre proposed for residential development (Class C3/C4/HMO/Hostel) within the Central B zone. We have reviewed the Roger Tym and Partners accompanying Viability Assessment (Appendix 3) which provides the evidence base that underpins the proposed charging schedule. As the Council has identified the Fulham Regeneration Area as a part of the Borough that requires significant inward investment to aid the regeneration and growth agenda it is our view that it would be appropriate to reduce CIL charges in such areas. There is no reference to this approach in the Viability Assessment and we contend that such an approach should be incorporated into subsequent drafts of the Charging Schedule.	Residential Central B Zone	Differential area CIL charges can only be set based on viability evidence, not on a desire to bring in significant inward investment. There is no evidence to suggest that a separate charge for Fulham Regeneration Area , as apart from the proposed Residential Central B Zone, is required.
PDCS	15.04	Valad Europe	Indigo Planning	The provision of 'live appraisals' comparing viability of residential development in a pre-CIL environment and viability of the same development subject to the CIL would have been helpful and would presumably help justify relevant proposed charge rates. In addition further justification on how overage levels have been decided, with regard to residential development would be helpful.	Recent/historic S106s and appraisals	Appraisals for live / recent schemes are confidential and cannot be provided as part of the evidence base.
PDCS	15.05	Valad Europe	Indigo Planning	<u>Calculation of CIL Charge</u> We note the reference at 5.3.2 to method for calculating deductions and the provision of the definition of an 'existing building in lawful use' which is at paragraph 40 of the CIL Regulations 2010. Cross reference to exemption provisions at 1.1.5 of the PDCS ('What development will be liable for CIL?') may be appropriate.	Cross-referencing	Will consider if necessary.
PDCS	15.06	Valad Europe	Indigo Planning	<u>Other Considerations</u> At 5.5.1 it is stated that the 'Council has not currently decided whether to introduce an instalment policy. It will consider whether to do so in the light of any decision by the Mayor of London to introduce an instalment policy for the Mayoral CIL, should the regulations allow'. We would contend that a reasonable instalment policy should be included from the outset in the arrangements. Both London Borough's that have in place existing CIL regimes (Redbridge and Wandsworth) allow payment by instalment under 69B of the CIL (Amendment) Regulations. Any decision by the Mayor in regard to an instalment policy on the Mayoral CIL is not likely to occur soon. The Mayoral CIL Charging schedule states that 'The Mayor is having discussions with London boroughs about establishing a common approach to payment by instalments' but provides no definitive timeframe for any adoption of an instalment approach.	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	15.07	Valad Europe	Indigo Planning	We also consider that Hammersmith and Fulham should include reference to a discretionary relief in the PDCS as this will be critical to some potential occupiers. Regulation 55 (1) of the 2010 CIL Regulations allows a charging authority to grant relief (for exceptional circumstances) from liability to pay CIL in respect of chargeable development if: (a) it appears there are exceptional circumstances which justify doing so; and b) the charging authority considers it expedient to do so.	Exceptional circumstances	It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.
PDCS	15.08	Valad Europe	Indigo Planning	Finally we note the amendment to the CIL regulations recently laid before Parliament which will establish special rules for calculating CIL liability for planning permissions granted under section 73 of the Town and Country Planning Act 1990 (TCPA) to 'vary' existing planning permissions. We would expect that there be reference made to these amendments in the Draft Charging Schedule.	New CIL Regulations	It is not necessary to refer to S73 provisions in the DCS.
PDCS	16.01	Chelsea Football Club	CBRE	Chelsea Football Club ('the Club') is currently the most successful of the five premier football clubs in the capital and due to its recent achievements has established itself as an international brand. With a turnover of over £210 million and employing over 500 permanent staff, the Club enjoys a role of supporting London as a world sporting centre and it also makes a significant contribution to the local and regional economies, tourism and education. Over 1,000 non-match day events are held per annum across the club's 81 event spaces.	All uses unless otherwise stated Stadium / D2	The LBHF Core Strategy supports the continued presence of the major sports venue for football and tennis, subject to the local impact of the venues being managed without added detriment to local residents. However, the Plan does not include any

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
Page 290				<p>The Club also directly contributes significantly into the local economy (quite apart from the indirect contribution via local businesses and indirect employment), as well as providing the Borough and the wider sub-region with a high profile brand to reinforce local image and character. In the 2010/11 season the Club also invested in excess of £7 million in Corporate Social Responsibility, including over £5 million of community investment and £2 million to charities. In addition, the Club's "Football in the Community" schemes and facilities had more than 850,000 participants in London and the South-East in the same year. The Club thereby is a major contributor to London's World City status and West London and the Borough's economy.</p> <p>Regarding CIL, the Club recognise the need for a mechanism to enable the co-ordinated collection of funds to enable the delivery of essential physical and social infrastructure required to support the delivery of regeneration across the Borough. However, the Club have concerns with regards the LBHF PDCS and associated evidence base as summarised below.</p> <p><u>Charge Rate for All Development</u> The PDCS currently assumes a charge of £80 per sq m of development for all uses excluding residential, office, industrial and warehousing, health and education uses.</p> <p>As you are aware, the Club are considering the potential to expand their current stadium at Stamford Bridge or develop a new stadium at alternative locations locally. Based on the above categorisation, a charge of £80 per sq m would be levied on any additional stadium (Class D2) floorspace.</p> <p>The Roger Tym and Partners Viability Assessment prepared in support of the PDCS has not tested the viability implications of imposing such a charge on stadium development. Whilst it is accepted that is not appropriate to test the viability impacts on all D2 leisure uses (e.g. Cinemas, music venues, swimming baths etc), given the strategic importance of the Club to the London wide and local economies, it is recommended that the authorities work with the Club to ensure any CIL charge would be appropriate to enable the viable delivery of an expanded or new stadium development.</p> <p>If necessary, the charge for Class D2 Stadium use should be exempt or separated out and a charge level set which will not impact upon viability.</p> <p>The Club welcome the opportunity to work with the Borough to assess the impact of CIL on the viability of stadium development to ensure the PDCS is based upon a robust evidence base that will not compromise the Club's long term future in the Borough.</p>	uses	development proposals which involve Stamford Bridge Stadium or Chelsea Football Club or have any policies which support redevelopment or relocation of the stadium. Accordingly, there is no basis on which to define a schemes for CIL appraisal purposes. Therefore, it is not appropriate or necessary to assess the viability of a hypothetical scheme involving the club which may be on the present site or another.
	PDCS	16.02	Chelsea Football Club	CBRE	<p><u>Charging Zone Boundaries</u> Figure 4.5 (Proposed CIL Charging Zones) of the Roger Tym and Partners Viability Assessment sets out the proposed Charging Zone boundaries for the LBHF CIL.</p> <p>Figure 4.3 shows that Stamford Bridge falls within the SW6 (1) ward which is identified as falling within the second lowest value band for average sales prices for terraced houses (£790k to £1.28m).</p> <p>Figure 4.4 shows that the SW6 (1) ward is identified as having average flat sales prices between £440,000 to £550,000 per unit. This is compared to the SW6 (2) ward, immediately to the south of Fulham Road, where average sales values are higher at £550,000 to £660,000.</p> <p>Whilst part of the SW6(1) ward falls within the Central Charging Zone (where the residential charge rate is set at a lower rate of £200 per sq m of residential floorspace), the other part of the SW6(1) ward, including Stamford Bridge has been included within the South Charging Zone.</p> <p>Para 1.3 of the Roger Tym and Partner's Viability Assessment Report states "<i>it is fundamental that the evidence demonstrates different levels of viability either side of boundary line</i>".</p>	Residential Central B Zone Residential South Zone

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				<p>It goes on to state at Para 4.36 that, “it is difficult to precisely define zones in such a way as to eliminate possible issues with any one site because it is adjacent to a boundary and therefore potentially paying a higher charge than if located on an immediately adjacent site the other side of the boundary”.</p> <p>Para 4.38 advises “it was considered that the most reasonable approach was for the boundaries to be drawn down the middle of main roads, where appropriate. This rule is followed for the majority of the boundaries”.</p> <p>There is no evidence or explanation provided to justify the deviation of the charging zone boundary from Fulham Road to include Stamford Bridge. It is the view of the Club that the Charging Zone boundary should be revised to run along the centre of Fulham Road with the entirety of Ward SW6 (1) falling within the Central Charging Zone not the South Charging Zone as currently indicated.</p> <p>The Club therefore request that the Central/South Charging Zone boundary be revised and further evidence and justification provided in relation to setting of the boundary between the charging zones.</p>		
PDCS	16.03	Chelsea Football Club	CBRE	<p><u>Level of Residential Charge within the ‘South’ Charging Zone</u> Para 4.1 of the Roger Tym and Partners Viability Assessment produced in support of the PDCS states, “the fundamental premise is that the CIL must be set at a level that does not put at serious risk the delivery of the Core Strategy”.</p> <p>The proposed ‘South’ charging zone covers a third of the Borough, including the Club’s football stadium at Stamford Bridge. At a rate of £400 per sq m for residential floorspace this would be the joint second highest proposed residential charge in the London boroughs to date.</p> <p>Only the riverside area within the Vauxhall, Nine Elms, Battersea Opportunity Area (VNEB OA) in LB Wandsworth has a higher proposed residential charge rate of £565 per sq m and this reduces to £265 per sq m for sites not immediately adjacent to the river.</p> <p>The only other location where £400 per sq m is proposed is again a small area directly adjacent to the River Thames in the northern part of the LB Southwark.</p> <p>Away from riverside locations, in all other boroughs, it has been recognised that the achievable residential values are likely to be lower and therefore the level of CIL is lower. The average residential CIL charge away from riverside locations across London is currently £142 per sq m. [See attached summary of residential charge rates currently proposed in other London Boroughs – See Appendix 1 for detail.]</p> <p>The Roger Tym and Partners Viability Report submitted in support of the PDCS recognises that values are heavily influenced by access to waterside views and the specification of development (Para 4.15).</p> <p>We therefore believe that the level of charge for the South Zone is significantly above what is realistic or reasonable when compared to other boroughs and areas set back from the River Thames. Whilst levels of £400 per sq m may be viable in riverside locations the Club do not consider development away from the river front is capable of supporting such levels of charge.</p> <p>Para 4.1.3 of the PDCS recognises Government guidance that states the charging authorities should explain “why they consider that their proposed CIL rate (or rates) will not put the overall development across their area at serious risk”. [Para 8 of the DCLG’s Charge Setting and Charge Schedule Document].</p> <p>The Club do not consider sufficient justification has been provided for setting an aggregate charge across the whole of the South Charging Zone at £400 per sq m for residential. The Viability Appraisals, included within the Appendices to the Roger Tym and Partners Viability Assessment, do not test the impact of including the CIL charge on development. It is requested that further more detailed viability testing is undertaken to demonstrate the impact of a CIL charge on development.</p>	Residential South Zone Riverside values	See previous response to this commenter. LBHF charging rates compare favourably with neighbouring boroughs. See DCS supporting document.

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Page 292				<p>The level of CIL in the South Zone should therefore be reviewed and reduced to ensure the viability of development is safeguarded. Alternatively, the riverside locations should be separated out from the rest of the South Zone to reflect the benefit of riverside values and a lower charge rate set for the areas away from river frontages.</p> <p>...</p> <p><u>Appendix 1 - London CIL Residential Rates Comparables (October 2012)</u></p> <table border="1"> <thead> <tr> <th>London Borough</th> <th>Residential CIL Charge – Highest Rate (£ per sq m)</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>Wandsworth</td> <td>£575</td> <td>Riverside VNEB</td> </tr> <tr> <td>LBHF</td> <td>£400</td> <td>Southern Zone</td> </tr> <tr> <td>Southwark</td> <td>£400</td> <td>Northern zone immediately adjacent to river</td> </tr> <tr> <td>Merton</td> <td>£385</td> <td>Wimbledon</td> </tr> <tr> <td>Islington</td> <td>£300</td> <td>Borough wide</td> </tr> <tr> <td>Haringey</td> <td>£265</td> <td>West half of borough</td> </tr> <tr> <td>Brent</td> <td>£200</td> <td>Borough wide</td> </tr> <tr> <td>Barnet</td> <td>£135</td> <td>flat rate across all development</td> </tr> <tr> <td>Croydon</td> <td>£120</td> <td>Borough wide excl. Croydon Town Centre</td> </tr> <tr> <td>Harrow</td> <td>£110</td> <td>Borough wide</td> </tr> <tr> <td>Sutton</td> <td>£100</td> <td>Borough wide</td> </tr> <tr> <td>Lewisham</td> <td>£100</td> <td>northern tip of borough</td> </tr> <tr> <td>Hillingdon</td> <td>£95</td> <td>Borough wide</td> </tr> <tr> <td>Barking and Dagenham</td> <td>£70</td> <td>Barking Town Centre, Leftley and Faircross</td> </tr> <tr> <td>Redbridge</td> <td>£70</td> <td>Flat rate across all development</td> </tr> <tr> <td>Average</td> <td>£142</td> <td>N/A</td> </tr> </tbody> </table>	London Borough	Residential CIL Charge – Highest Rate (£ per sq m)	Location	Wandsworth	£575	Riverside VNEB	LBHF	£400	Southern Zone	Southwark	£400	Northern zone immediately adjacent to river	Merton	£385	Wimbledon	Islington	£300	Borough wide	Haringey	£265	West half of borough	Brent	£200	Borough wide	Barnet	£135	flat rate across all development	Croydon	£120	Borough wide excl. Croydon Town Centre	Harrow	£110	Borough wide	Sutton	£100	Borough wide	Lewisham	£100	northern tip of borough	Hillingdon	£95	Borough wide	Barking and Dagenham	£70	Barking Town Centre, Leftley and Faircross	Redbridge	£70	Flat rate across all development	Average	£142	N/A		
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PDCS	17.01	Stanhope	Gerald Eve	<p>...the BBC has recently disposed of the BBC Television Centre within the White City Opportunity Area which Stanhope has acquired. Stanhope is therefore now a major landowner within Hammersmith and Fulham.</p> <p>We are in the very early stages of bringing forward a development proposal for the site and are therefore unable to comment in detail on the extent to which the CIL charging schedule, as currently drafted, would affect the viability of the proposal that is finally submitted for consideration to the London Borough of Hammersmith and Fulham.</p> <p>Notwithstanding this, we fully support the Council's approach for adopting a lower charge for land within the White City Opportunity Area (north charging zone) as there is clearly a need to encourage investment and expedite delivery of the major sites in this area at the earliest opportunity. In this respect, we are keen to engage with the Council on viability matters concerning the emerging proposals for the BBC Television Centre and the implications that the current CIL drafting schedule may have on the overall planning proposals that may be achieved for this site.</p>	Residential North Zone	Support for lower Residential North Zone charge acknowledged																																																			
PDCS	18.01	Natural England	-	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is not a service provider, nor do we have detailed knowledge of infrastructure requirements of the area concerned. However, we note that the National Planning Policy Framework Para 114 states "Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure." We view CIL as playing an important role in delivering such a strategic approach.</p> <p>As such we advise that the council gives careful consideration to how it intends to meet this aspect of the NPPF, and the role of the CIL in this. In the absence of a CIL approach to enhancing the natural environment, we would be</p>	Natural environment infrastructure	Acknowledge further natural environment infrastructure background in Infrastructure Plan.																																																			

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				<p>concerned that the only enhancements to the natural environment would be ad hoc, and not deliver a strategic approach, and that as such the local plan may not be consistent with the NPPF.</p> <p>Potential infrastructure requirements may include:</p> <ul style="list-style-type: none"> • Access to natural greenspace. • Allotment provision. • Infrastructure identified in the local Rights of Way Improvement Plan. • Infrastructure identified by any Local Nature Partnerships and or BAP projects. • Infrastructure identified by any AONB management plans. • Infrastructure identified by any Green infrastructure strategies. • Other community aspirations or other green infrastructure projects (e.g. street tree planting). • Infrastructure identified to deliver climate change mitigation and adaptation. • Any infrastructure requirements needed to ensure that the Local Plan is Habitats Regulation Assessment compliant 		
PDCS	19.01	Chelsea Harbour	Jones Lang LaSalle	<p><u>Extent of the Proposed CIL Charge</u></p> <p>Our client supports the proposal for a nil CIL charge in respect of offices, industrial, warehousing, health, education, and affordable housing uses. Indeed, they agree that these uses are not sufficiently viable to support the provision of CIL.</p>	Health / education / industrial / warehousing	Support noted.
Page 293 PDCS	19.02	Chelsea Harbour	Jones Lang LaSalle	<p>...we note that it is proposed to charge £400 per sq m for residential development and £80 per sq m for all other development in the south charging area where our client's sites are based. Our client is strongly opposed to this charge as it will (when taking into account the Mayoral CIL charge of £50 per sq m) affect the viability, and therefore deliverability of developments, particularly those involving a significant amount of residential floorspace.</p> <p>As set out in page 7 of the "CIL Viability Assessment" document, "the fundamental premises is that CIL must be set at a level that does not put at risk the overall level of development in an area". However, we consider the CIL charges proposed (particularly in the south area) would fail this test and will deter development in the borough. Clearly, this could lead to LBHF failing to meet (yet again) its housing target).</p>	CIL charge	No change proposed to rate in South Fulham as this rate does not threaten viability.
	PDCS	19.03	Chelsea Harbour	Jones Lang LaSalle	<p>In addition, our client has a number of concerns with regards the manner in which the proposed CIL charges have been arrived at. These our outlined below:</p> <ul style="list-style-type: none"> • It is unjust that areas outside of the South Fulham Riverside (such as our client's sites) may be required to contribute to the maximum level of CIL in the borough when figure 2.7 of the "Infrastructure Plan" shows that such areas are expected to account for just 1,200 units (8.3%) of the 14,400 unit housing requirement up to 2032 in the borough, and will therefore have a negligible impact on local infrastructure requirements. 	Residential South Zone SFR DIFS
PDCS	19.04	Chelsea Harbour	Jones Lang LaSalle	<ul style="list-style-type: none"> • The "CIL Viability Assessment" does not include any indicative development appraisals for mixed use developments, which accounts for a significant number of developments in the borough. Until the impact on mixed use developments in the borough is assessed, our client does not consider LBHF can be certain that CIL charges would have no adverse impact on development viability. 	Mixed uses	The sample viability appraisals for the DCS include large mixed use schemes.
PDCS	19.05	Chelsea Harbour	Jones Lang LaSalle	<ul style="list-style-type: none"> • The indicative development appraisals contained in the "CIL Viability Assessment" do not make any provisions for general contingency, and assume only an architect under the heading 'professional fees'. In reality, for a scheme of this size there would be numerous consultants such as a planning and transport consultant, structural engineers, heritage/flooding/daylight and sunlight consultants etc. 	Contingency Professional fees	There is an allowance of 5% on costs for contingency. Professional fees in the appraisals relate to the costs incurred to bring the development forward and cover items such as; surveys, architects, quantity surveyor etc. Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs.

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PDCS	19.06	Chelsea Harbour	Jones Lang LaSalle	<ul style="list-style-type: none"> The residential appraisals do not set out what unit sizes are assumed. Indeed, in respect of the 50 unit residential scheme for example, 30 market apartments in the south area would have a unit price of £581,400. This seems a huge assumption considering the significance of the proposed CIL charges for development viability in the borough. 	Residential values	Unit sizes are set out in Appendix A of the DCS Viability Study
PDCS	19.07	Chelsea Harbour	Jones Lang LaSalle	<p><u>Relief for Exceptional Circumstances</u></p> <p>Section 55 of the Community Infrastructure Regulations 2010 states that “a charging authority may grant relief (“relief for exceptional circumstances”) from liability to pay CIL in respect of a chargeable development [...] if it appears to the charging authority that there are exceptional circumstances for doing so; and (b) the charging authority considers it expedient to do so”.</p> <p>However, as with the Mayoral CIL, the PDCS makes no allowance for relief for exceptional circumstances. Clearly, this approach runs contrary to the Government’s recently announced strategy to incentivise developers to bring forward more development in the current economic climate. Indeed, the proposed approach is likely to bring about a situation where the vast majority of planning obligations for new developments cannot be negotiated. This would further compound the concerns raised over development viability outlined above.</p>	Exceptional circumstance	It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.
PDCS	19.08	Chelsea Harbour	Jones Lang LaSalle	<p><u>Impact on Affordable Housing Delivery</u></p> <p>Expanding on the above point, if a scheme includes affordable housing then the ability to negotiate that element still exists in accordance with the national CIL Regulations 2010. However, given that the delivery of affordable housing is a key priority for LBHF, London and the UK generally, it is astounding that this could be significantly reduced through negotiation at the expense of the introduction of a non-negotiable CIL for general infrastructure.</p>	Affordable housing	Viability assessment assumes a policy-compliant level of affordable housing can still be achieved with the proposed CIL charges.
PDCS	19.09	Chelsea Harbour	Jones Lang LaSalle	<p><u>Additional ‘Section 106’ Planning Obligations</u></p> <p>Although this is an issue pertaining to CIL generally, our client is concerned that there is no guarantee that a section 106 contribution would not be proposed by LBHF in relation to infrastructure not contained in the R123 list of infrastructure projects in the borough.</p> <p>Indeed, we note from Figure 3.2 of the PDCS that the funding gap of approximately £1.6m is expected to comprise £405m from CIL, £1,127m from CIL for Park Royal / HS2 and Crossrail 2, and £87m from s.106. Consequently it seems likely that schemes will, in reality, be asked to contribute in addition to CIL and affordable housing. Paragraph 3.3.3 of the PDCS alludes to this possibility, which would exacerbate further the viability issues outlined previously.</p>	S106 costs	It is possible that developments may need S106 obligations (in addition to CIL) to make them acceptable. Appraisals now include a £1,000 per private dwelling S106 costs. However, it is recognised that in some cases there may be additional significant S106 requirements which would need to come out of the overage identified in the viability study; albeit, many S106 purposes would in future be funded through CIL. This possibility is taken into account when considering how much of the overage could fund a CIL charge.
PDCS	19.10	Chelsea Harbour	Jones Lang LaSalle	<p><u>Payment Instalments</u></p> <p>Paragraph 5.5.1 of the PDCS states that “the Council has not currently decided whether to introduce an instalment policy. It will consider whether to do so in light of any decision by the Mayor of London to introduce an instalment policy for Mayoral CIL, should the Regulations allow”.</p> <p>Notwithstanding the Mayoral CIL, we would strongly advocate the introduction of an instalment policy in the final PDCS. Indeed, a failure to do so will clearly involve the total CIL liability (LBHF and Mayoral CIL) being required upon commencement of the development in question. This is clearly unreasonable considering that developers will not, at such an early stage in the development, be generating revenue from the sale and/or lease of floorspace.</p>	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London’s CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	19.11	Chelsea Harbour	Jones Lang LaSalle	<p><u>Conclusion</u></p> <p>In view of the above, our client urges LBHF to re-consider the CIL charges proposed in the PDCS – particularly in the south charging zone. In particular, they would ask that development appraisals be produced for mixed use</p>	Mixed uses	The sample viability appraisals for the DCS include large mixed use schemes.

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				developments, which represent a significant proportion of development in the borough, prior to the PDCS being adopted.		
PDCS	19.12	Chelsea Harbour	Jones Lang LaSalle	However, should LBHF ultimately decide to proceed with the PDCS in its current form, then our client would fully support the Government's advice to keep charging schedules under review to take account of changing market conditions and to respond to changes in the funding gap for infrastructure required to support development. This will allow the CIL charge to be lowered in the future if, as expected, it is considered to have a negative impact on development viability.	Monitoring and review	Review of the CIL charges would depend on monitoring changing market conditions affecting development, in particular, key appraisal assumptions and the viability of schemes coming forward.
PDCS	20.01	Romulus Construction	Jones Lang LaSalle	We write on behalf of our client Romulus Construction Ltd, who is the freehold owner of land in the town centres of the Hammersmith & Fulham Borough. <u>Extent of the Proposed CIL</u> Our client supports the proposal for a nil CIL charge in respect of industrial, warehousing, health, education, and affordable housing uses. Indeed, they agree that these uses are not sufficiently viable to support the provision of CIL.	Health / education / industrial / warehousing	Support noted.
PDCS	20.02	Romulus Construction	Jones Lang LaSalle	We note that it is proposed to charge £200 per sqm for residential development and £80 per sqm for office development and all other land uses in the Central A charging area (where some of our client's land is located). Romulus is strongly opposed to these proposed changes they will have a significant detrimental impact on the viability, and therefore the timely deliverability, of otherwise sustainable development proposals. This situation is exacerbated by the Mayor's Community Infrastructure Levy, already payable at £50 per sqm on all land uses (subject to very limited exception). Taken together, and regardless of the prevailing market conditions, these changes represent a critical constraint on our client's aspirations to continue to invest in the regeneration of the Borough, and in particular the urban renewal of Hammersmith Town Centre,. Which Romulus has long promoted and with which we are currently engaged with Officers on a pre-application basis. As set out on page 7 of the "CIL Viability Assessment" document, <i>"the fundamental premise is that CIL must be set at a level that does not put at risk the overall level of development in an area"</i> . However, we consider the CIL charges proposed (particularly in the central Hammersmith area) fail this test and will deter development in the Borough. In terms of residential development the most likely outcome is a continuing under delivery of all forms and tenure of housing, in the context of the London Plan targets, and the same applies to office, hotel and other commercial land uses.	General viability and deliverability	The £80/m ² charge for offices only applies in Hammersmith Town Centre. No evidence is provided to show that schemes could not be viable.
PDCS	20.03	Romulus Construction	Jones Lang LaSalle	i. The "CIL Viability Assessment" does not include any indicative development appraisals for mixed use schemes, which will account for a significant proportion of developments in the Borough, and in particular town centre proposals. Until the impact on mixed use development is fully assessed, our client does not consider LBHF can reach the conclusion that CIL charges would have no adverse impact on development viability.	Mixed uses	The sample viability appraisals for the DCS include large mixed use schemes.
PDCS	20.04	Romulus Construction	Jones Lang LaSalle	ii. The Council's viability assessment that forms of the basis of the proposed 'standard' charge of £80 per sqm for, amongst others, office, hotel and student housing, is based on residual land values that reflect a lack of recognition of land and development costs, and an inflated assessment of the rental value in the current market.	Other uses	No alternative assumptions are suggested by the consultee.
PDCS	20.05	Romulus Construction	Jones Lang LaSalle	iii. Further to point no.ii, the indicative development appraisals contained in the "CIL Viability Assessment" do not make the necessary provision for general contingency, and include only "architect under the heading "professional fees". In reality, schemes of this scale will require a multi-disciplinary team of consultants, covering such matters as planning, transport, structural engineering, heritage, flooding, noise and daylight/sunlight etc.	Contingency Professional fees	There is an allowance of 5% on costs for contingency. Professional fees in the appraisals relate to the costs incurred to bring the development forward and cover items such as; surveys, architects, quantity surveyor etc. Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs.

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PDCS	20.06	Romulus Construction	Jones Lang LaSalle	iv. Figure 2.7 of the “Infrastructure Plan” indicates that Hammersmith Town Centre is expected to account for just 1,000 units (7%) of the 14,400 unit housing requirement up to 2032 in the Borough, and therefore regardless of the residential charging levels it will have a negligible impact on local infrastructure requirements.	Offices: Central A	CIL areas are determined by viability, not infrastructure need.
PDCS	20.07	Romulus Construction	Jones Lang LaSalle	<u>Relief for Exceptional Circumstances</u> Section 55 of the Community Infrastructure Regulations 2010 states that “a charging authority may grant relief (“relief for exceptional circumstances”) from liability to pay CIL in respect of a chargeable development [...] if it appears to the charging authority that there are exceptional circumstances for doing so; and (b) the charging authority considers it expedient to do so”. However, as with the Mayoral CIL, the PDCS makes no allowance for relief for exceptional circumstances. This approach runs contrary to the Government’s stated strategy to incentivise developers to bring forward more development in the current economic climate. Indeed, a consequence of the proposed approach is that there is little, if any, scope for applicants and developers to negotiate with the Local Authority on Planning Obligations. This compounds the concerns over development viability outlined above, and has a critical link to the ability or otherwise of residential development schemes to contribute towards the LBHF and wider targets for affordable housing.	Exceptional circumstance	It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.
PDCS	20.08	Romulus Construction	Jones Lang LaSalle	<u>Payment by Instalments</u> Paragraph 5.5.1 of the PDCS states that “the Council has not currently decided whether to introduce an instalment policy. It will consider whether to do so in light of any decision by the Mayor of London to introduce an instalment policy for Mayoral CIL, should the Regulations allow”. Notwithstanding the Mayoral CIL, we would strongly advocate the introduction of an instalment policy in the final PDCS. A failure to do so will result in the total CIL liability (LBHF and Mayoral CIL) being payable upon commencement of development. This is clearly unreasonable on the basis that at the outset our client will not be generating revenue from the sale and/or lease of any new floorspace.	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London’s CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	20.09	Romulus Construction	Jones Lang LaSalle	<u>Conclusions</u> In light of the above, and on behalf of our client, we request that the Council re-considers the CIL charges proposed in the Preliminary Draft Charging Schedule – particularly those for town centre areas. Specifically, we would welcome the introduction of robust and realistic residual land valuation appraisals that underpin the assessment of scheme viability, including for mixed use developments.	Mixed uses	The sample viability appraisals for the DCS include large mixed use schemes.
PDCS	20.10	Romulus Construction	Jones Lang LaSalle	However, should LBHF ultimately proceed with the PDCS in its current form, then our client fully supports the Government’s stance of keeping charging schedules under review to take account of fluctuating market conditions, and to reflect shifts in the funding gap for infrastructure required to support development. This will allow charges to be lowered if, as we fully expect, the levy has a detrimental impact on development viability and scheme implementation.	Monitoring and review	Review of the CIL charges would depend on monitoring changing market conditions affecting development, in particular, key appraisal assumptions and the viability of schemes coming forward.
PDCS	21.01	Land Securities	Chase and Partners	<u>INFRASTRUCTURE PLAN</u> 1.1 Land Securities (LS) considers that Appendix 2 – Infrastructure Planning Schedule (IPS) represents a comprehensive list of infrastructure charging items. It is considered, however, that the rationale behind how the various category and schemes is delivered. There is some variation in the delivery of specific categories, but no explanation as to how these have been arrived at.	IPS delivery columns	Explain categories in Infrastructure Plan.
PDCS	21.02	Land Securities	Chase and Partners	1.2 Reference is made to the White City DIFS, but states that this will not be produced at this stage and will be published at the second draft stage. It is therefore considered that the publication of the PDCS is premature.	WC DIFS: General	The DIFS has been published with the White City Opportunity Area Framework SPD. It has been referred to on preparing the DCS Viability Study.
PDCS	21.03	Land Securities	Chase and Partners	<u>PRELIMINARY DRAFT CHARGING SCHEDULE (PDSC)</u> 1.1 Land Securities (LS) support the provision of an indicative list of infrastructure requirements/projects to support the objectives of the Core Strategy (paragraph 1.2.8). LS also support the recognition that if an infrastructure scheme is on the list (R123 list) that a Section 106 payment cannot be negotiated separately (paragraph 1.2.10).	Planning Obligations SPD	Noted.

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				<p>1.2 Paragraphs 1.2.13 – 1.2.15 refer to the publication of a Planning Obligations SPD that would:</p> <p><i>“...most likely be consulted on alongside the CIL Draft Charging Schedule (DCS) and adopted at the same time as the final CIL Charging Schedule.”</i> (paragraph 1.2.14)</p> <p>1.3 A review of the Council’s website and CIL consultation page does not appear to contain such a document. It is considered that if this is to inform the CIL Charging Schedule that consultation should take place in parallel.</p>		
PDCS	21.04	Land Securities	Chase and Partners	1.4 LS support the Councils suggested review to CIL charging and that this will be done in light of changing market conditions (paragraph 1.4.1 – 1.4.2).	Monitoring and review	Support noted.
PDCS	21.05	Land Securities	Chase and Partners	<p>1.5 Section 2 of the PDSC sets out the ‘Evidence base and approach’ and introduces the relevant Development Infrastructure Funding Studies (DIFS) for regeneration areas in the Borough. Paragraph 2.2.2 states:</p> <p><i>“To satisfy the evidence base requirements in the CIL regulations, the main infrastructure planning and viability evidence base documents for the PDCS are summarised in Figure 2.3 ...”</i></p> <p>1.6 Figure 2.3 only refers to the South Fulham Riverside DIFS and states at 2.2.5 that the DIFS for the White City Opportunity Area is currently being prepared and will be produced at the in accordance with the next draft of the White City Opportunity Area Planning Framework in Autumn/Winter 2012. It further states that this document can inform future stages of the CIL charging schedule.</p> <p>1.7 LS consider that the White City DIFS is an integral part of the evidence base for the consultation on the PDCS and that to begin consultation without it is premature. This is further supported by paragraph 4.1.2 which states:</p> <p><i>“As set out in Section 2.2, the Viability Assessment is complimented by viability evidence base in the SFR DIFS, and may, for future stages of this emerging CIL charging schedule, be complimented by viability evidence in a White City DIFS which has yet to be published. However, the available evidence does not currently justify differential CIL charging zones for these regeneration areas.”</i></p> <p>1.8 This suggests that the evidence base in relation to charging rates in White City is incomplete and therefore the publication of the PDCS is too early. It is considered that only until the full evidence base is available should the Council invite representations on the PDCS.</p> <p>1.9 The PDCS cannot be fully assessed without the White City DIF as it does not provide a full viability appraisal for development in the area affected.</p>	WC DIFS: General	The DIFS has been published with the White City Opportunity Area Framework SPD. It has been referred to on preparing the DCS Viability Study.
PDCS	21.06	Land Securities	Chase and Partners	<p>1.9 ... In this instance it appears that an arbitrary figure has been included for the area shown as ‘North’, and this is contrary to Central Government advice which states:</p> <p><i>“... why they [the Local Planning Authority] consider that their proposed CIL rate (or rates) will not put the overall development across their area at serious risk.”</i></p> <p>1.10 White City Opportunity Area is a strategic location for development within the London Plan. Comprehensive development is earmarked for the area (also recognised as the ‘North’ charging zone). There are only two charges identified for the ‘North charging zone’:</p> <ul style="list-style-type: none"> • All uses otherwise stated £80/sqm; and • Residential £100/sqm. <p>1.11 It is unclear how the viability appraisal has been applied for new development coming forward and the rationale behind it. This is a strategic area where new infrastructure to support new development will be generated by CIL. However, there is not a clear explanation how the charging rates can be applied and whether they are justified for the</p>	Residential North Zone	For the DCS stage, additional viability appraisals have been undertaken for White City East.

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				specific developments.		
PDCS	22.01	Inner North West London Primary Care Trusts	-	<p>NHS Hammersmith and Fulham is the primary care trust for the borough. It currently discharges its duties through joint arrangements with NHS Kensington and Chelsea and NHS Westminster.</p> <p>NHS Hammersmith and Fulham is responsible for commissioning all of primary care services in Hammersmith and Fulham. Our public health role means that we have a role in ensuring that improvements are made against wider factors that affect health and wellbeing and health inequalities.</p> <p>Good housing, healthy living environments, access to health facilities and sustainability are some of the wider determinants of health that we have an interest in and these are areas that our submission will focus on.</p> <p><u>Health</u> We support the inclusion of out of hospital care in the community infrastructure levy charging schedule as out of hospital care is a key priority for NHS North West London.</p> <p>We would like to note that the room improvements to Richford Gate Practice have now been completed (H6) as has the relocation of the North End Centre for Health and Well Being into a new facility (H7).</p> <p><i>Cumulative Impact</i> The NHS Healthy Urban Development Unit (HUDU) has developed a model that predicts the future health needs based on the size and proposed use of the development. The HUDU model has been run to estimate the cumulative cost impacts for 2016 to 2032 based on 720 housing units per annum (as per Figure 2.7 of the infrastructure plan). This can be seen in appendix 1. We recommend that the capital cost figure from this should be included in the plan minus:</p> <ul style="list-style-type: none"> -The White City (East) facility - £1.64million - South Fulham Riverside - £4.04m - Mental health communities services – West London Mental Health NHS Trust funding gap – £2m <p>This would give a borough wide capital cost figure 2016-2032 of £4,750,080. We recommend that this should be added as a row titled primary and secondary healthcare requirements 2016-2032 with no assumed/committed funding.</p> <p>The Out of Hospital costs reflect the longer term ambition to shift care closer to home and out of hospitals. We recommend therefore that annual ongoing cost should be projected forward to 2032 which would give a total of £10.6m (£520k X 20). We suggest using this cost estimate rather the HUDU model revenue cost figure below.</p>	Health infrastructure	Acknowledge further health infrastructure background in Infrastructure Plan / IPS.
PDCS	22.02	Inner North West London Primary Care Trusts	-	<p><u>Transport</u> Given the Local Implementation Plan encourages cycling and walking; we feel higher priority should be given to spending linked to cycling and walking infrastructure. It is known that investment in infrastructure for non-motorised transport yields positive impacts on the environment from less pollution, as well as improving safety from the protection of vulnerable road users and improving accessibility¹. Certain features and characteristics in urban areas are known to positively influence walking and cycling. These beneficial characteristics include pedestrian and cycle friendly site and street design.</p> <p>The FIA Foundation (2010) Share the Road [hyperlink provided] Sustrans (2007) Creating the Environment for Active Travel [hyperlink provided]</p>	Transport infrastructure	Acknowledge transport infrastructure and health benefits in Infrastructure Plan / IPS.
PDCS	23.01	Asda	Thomas Eggar	<p><u>A KEY OBJECTIONS</u> <u>1 Concerns over financial assumptions underpinning the Viability Assessment</u></p> <p>The Viability Report contains retail development assumptions that in our view are inadequate as they do not make</p>	S106 costs	The viability methodology assumes that S106 costs (beyond the residual amount of £1000/private residential unit allowed for in the CIL appraisals) in addition to CIL will be

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Page 299				<p>allowances for the costs involved in obtaining planning permission for the development scheme.</p> <p>We note Roger Tym & Partners at paragraph 3.18 states that it has 'reflected the fact that on-site infrastructure may require S106 obligations'. Appendix 4.11 of the Viability Assessment, however, does not show clearly that such S106 obligations have been taken into account in the development appraisal relating to convenience retail.</p> <p>By excluding the potentially large costs of obtaining planning permission and S106 contributions payable in addition to CIL (examples of which are set out in schedule 1 to this letter), the Council has underestimated the true cost of convenience retail developments, and artificially inflated the relevant benchmark land values used for its financial viability models. This will, in turn, have inflated the amount of the CIL levy proposed.</p> <p>...</p> <p><u>Schedule 1</u> <u>S.106 Agreements</u></p> <p>The types of contribution that could still feasibly be sought from a retail developer once the charging schedule has been adopted include:</p> <ul style="list-style-type: none"> • Cost of site-specific highways works; including junction improvements, road widening schemes, new access roads; diversion orders and other highways works; • Cost of providing affordable retail units or payment in lieu of such provision; • Cost of extending the Council's CCTV Network or Public Transport Network to include the scheme (including the costs of creating new bus stops, real time information and providing new bus services to serve the site); • Monitoring costs of compliance with employment/ apprenticeship schemes and travel plans; • Environmental off-set contributions, to mitigate the loss of habitat or greenery caused by the scheme; • The cost of any remediation and decontamination works to be carried out by the Council on the Developer's behalf; • Payments for town centre improvements intended to mitigate the impact of the development on the town centre or neighbouring areas; and • The costs incurred by the Council of maintaining any site specific infrastructure required by the development. 		<p>taken from the overage (residual land value minus benchmark land value). Therefore, the CIL charge is set at a level that will allow a substantial amount of overage to remain for S106 and other purposes.</p>	
	PDCS	23.02	Asda	Thomas Eggar	<p><u>Planning Costs</u></p> <p>The cost of obtaining planning permission from the Council a development scheme can be significant. These are not limited to the Council's own fees for submitting an application and obtaining pre-application advice, but also include:</p> <ul style="list-style-type: none"> • The professional costs involved in appointing consultants to prepare the application; • Legal costs involved in negotiating the underlying legal agreements; • Costs of negotiating appropriate planning conditions and obligations with the Council; • Consultation costs, particularly for larger schemes which will need to show evidence of early community engagement; and • If permission is refused, or challenged by an aggrieved third party, the costs of an appeal to the planning inspector or a judicial review challenge in the High Court. 	Professional fees	<p>Professional fees relate to the costs incurred to bring the development forward and cover items such as; surveys, architects, quantity surveyor etc. Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs at 10% (increased from 8% at the PDCS stage).</p>
	PDCS	23.03	Asda	Thomas Eggar	<p><u>2 Change of use and conversion projects</u></p> <p>The Council do not appear to have taken into account in the viability assessment the economics of regeneration projects into account.</p> <p>By way of explanation, Regulation 40 of the CIL Regulations only permits developers to deduct pre-existing floorspace from the CIL calculation if it is 'in lawful use'. 'Lawful use' is defined in Regulation 40 (10) and requires part</p>	Change of use and conversion	<p>Amendments to the CIL Regulations in February 2014 have extended the relevant period from 12 months to 3 years. Any floorspace created in a conversion or change of use of a longer term vacant building would be liable to pay CIL as though that was new build floorspace.</p>

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				<p>of a building to have been in use for a six months continuous period in the 12 months before the date of the planning permission permitting the development.</p> <p>However, many regeneration projects on Brownfield land involve demolishing, converting or redeveloping buildings that have lain vacant for some time. This is particularly true of schemes which involve change of use from Employment Land, where the fact that a unit has been vacant for a considerable time is often a key factor in the Council's decision to grant planning permission for the scheme.</p> <p>The Viability Report has not considered the impact of CIL on the viability of conversion/regeneration schemes involving vacant units. It is difficult to see how the Council can assess whether the imposition of CIL will put the majority of these schemes at risk.</p>		<p>However, it is not considered that this would be a common enough situation to justify viability separate assessments or provide acceptable cost and value assumptions for such assessments.</p>
PDCS	23.04	Asda	Thomas Eggar	<p><u>3 Concerns about the Council's approach to setting Community Infrastructure Levy charges generally</u></p> <p>The stated purpose of CIL is to raise revenue for infrastructure necessary to serve development. CIL is intended to address the imbalance of raising funds for infrastructure under the s.106 route, where larger schemes have effectively subsidised minor developments. However, CIL does not replace the s.106 revenue stream; it will simply provide additional revenue for infrastructure.</p> <p>We accept that some superstores may individually necessitate the provision of specific local infrastructure, but it could be argued that given the proliferation of modern supermarkets infrastructure requirements have reduced. It is frequently the case that journey times fall as new supermarkets are opened. The inevitable consequence of this is that most existing infrastructure is used less, not more, as a result of such developments. There is a concern that for retail development local authorities will still seek extensive site-specific commitments under the Section 106 regime in addition to CIL. Together the two charges represent a double levy for infrastructure, which is being placed onto a very limited category of development.</p> <p>There is also a risk that some of the infrastructure projects identified by the Council to be funded by CIL will already have been funded by existing s.106 commitments in respect of undelivered projects. At present, s.106 contributions paid to the Council are repaid to the developer if the infrastructure has not been delivered within a certain period of time. These delivery periods are long, usually between five and ten years, and the onus is on the developer to check that the Council has carried out the works and to request a refund if not. As you will be aware, there is no similar mechanism to allow developers to reclaim unspent CIL contributions.</p>	<p>All uses unless otherwise stated</p> <p>Supermarkets</p>	<p>CIL charges are based on an assessment of the viability of development and not on the infrastructure need arising.</p> <p>The Council will make clear what it intends to spend CIL on in the R123 list. CIL Regulations control the use of S106 obligations.</p> <p>The comments seem to be more about the CIL concept rather than LBHF's proposals.</p>
PDCS	23.05	Asda	Thomas Eggar	<p><u>B KEY SUGGESTIONS</u></p> <p><u>1 Exceptional circumstances relief</u></p> <p>Whilst the Council has not stated whether it intends to adopt exceptional circumstances relief, we would strongly encourage it to do so.</p> <p>The Viability Report makes it clear that the viability of any particular development scheme is finely balanced, and will fluctuate depending on the costs involved in the development and the state of the economy when the development comes forward. It identified a number of housing or commercial schemes, which are on the borders of viability, which will not come forward as a result of CIL being imposed on them.</p> <p>By adopting 'exceptional circumstances' relief the Council would have the flexibility, if it so wished, to allow strategic or desirable but unprofitable development schemes to come forward by exempting them from the CIL charge or reducing it in certain circumstances.</p> <p>Simply exempting schemes from certain Section 106 obligations is unlikely to be sufficient to counteract the negative impact of the CIL charge, particularly as not all schemes (in particular retail developments) would attract an affordable housing requirement which could be waived. Further, the types of strategic development which are most likely to be of concern to the Council, such as large regeneration or housing schemes, are precisely the types of development which are likely to carry heavy site specific infrastructure costs, which will be funded under s.106, and are most likely to</p>	<p>Exceptional circumstances</p>	<p>It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.</p>

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				qualify for 'exceptional circumstances' relief.		
PDCS	23.06	Asda	Thomas Eggar	<p><u>2 Proposed Staged Payments Policy and Phased Developments</u></p> <p>We note that the Council does not proposed to consult on a staged payments policy at this time. When considering a staged payments policy, we should be grateful if the Council would take into account the fact that many major development projects are implemented in phases and ensure that developers are not disadvantaged by submitting an application for full, rather than outline, planning permission.</p> <p>Large scale developments are phased for a number of reasons, most commonly because the revenue generated by the early phases of the development needs to be realised in order to fund the remainder of the scheme.</p> <p>As planning authorities have often expressed a preference for determining full planning applications where all of the relevant information is available to them, large scale developments are often submitted to the Council as full planning applications, rather than applications for outline permission. If this trend is to continue, allowances will need to be made for the phasing of large scale developments which have been granted in full, rather than outline, planning permission.</p> <p>At present the CIL Regulations allow for staged payments to be linked to the period of time that has passed since commencement, rather than the phase of development achieved. This means that any one staged payment could fall due before the earlier phases of the scheme have started to generate the revenue required to fund it, rendering the project economically unviable. This puts developers who have applied for full planning permission at a disadvantage, compared to those who have an outline permission, as the charging regime for outline planning permissions makes specific allowances for phased development.</p> <p>Under the CIL Regulations, developers are required to serve a notice of commencement of development on the Charging Authority, but are not required to notify them of the commencement of individual phases of development. This could, however, be easily addressed through the use of planning conditions or, alternatively, planning obligations requested through a Section 106 agreement.</p>	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	24.0	Ptarmigan Riverside	DP9	<p>... Therefore, in setting CIL rates the Charging Authority must be primarily concerned with the safeguarding of the Regeneration Areas against an serious viability risk. In our opinion, this must be the fundamental underlying objective, in addition to safeguarding designated Opportunity Areas within the Borough. For any of the Regeneration Areas to be put at serious risk, would pose consequential material adverse effect on the deliverability of the Development Plan.</p> <p>The Roger Tym & Partners Viability Assessment explains the policy context associated with the Charging Authority's area, and on page 5 sets out the indicative housing targets as derived from the Core Strategy. It is useful that the Viability Assessment has highlighted the importance of the Regeneration Areas but it is then both surprising and concerning that the Viability Assessment does not then appear to consider or assess the effect of CIL on these areas specifically (especially since the information / material to do so is readily available to the Charging Authority). Instead, the only analysis undertaken within the Viability Assessment concerning a number of hypothetical residential only schemes (amounting to x unit scheme scenario and a x unit scheme scenario within different geographical zones).</p> <p>It is difficult to understand why an analysis of this nature is in anyway fit for purpose when looking at the type of development advocated by the Development Plan (i.e. the Regeneration Areas and Opportunity Areas). This is because the type of development within the Opportunity Areas and Regeneration Areas is of a much greater scale and complexity, including very different viability inputs and assumptions. The Development Infrastructure Funding Study (DIFS) for the South Fulham Riverside Area identified and costs a series of infrastructure requirements and these should form part of any viability assessment. In our strong opinion, the 'normal circumstances' of development have not been properly defined or assessed.</p>	Large sites	<p>The South Fulham Riverside DIFS has been taken onto account.</p> <p>Large and mixed use appraisals have been included in the viability appraisal for the DCS.</p>
PDCS	24.01	Ptarmigan Riverside	DP9	...Ptarmigan hold an interest in Albert and Swedish wharves which are located to the east of Wandsworth Bridge...	R123 list	Following revisions to CIL Regulations, a draft R123 list is appropriate evidence to

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				<p>Ptarmigan consider both the Albert and Swedish Wharf sites offer real potential to contribute to the regeneration of the South Fulham Riverside area and the wider Borough and on this basis are currently working up plans to realise the development potential of the sites as well as the adjacent Comley's Wharf, based upon the retention of the wharf usage, alongside a residential led mixed-use development.</p> <p><u>Representations</u></p> <p>...</p> <p>Whereas, whilst the Infrastructure Plan is useful, and is assumed to form the basis of the list of infrastructure projects referred to in Regulation 123, there is no requirement for the Regulation 123 list to be published and examined at the same time as the Charging Schedule. Unfortunately this means that, at this stage, developers have no definite or reliable knowledge about the nature of infrastructure that will be funded through CIL.</p>		inform the preparation of the DCS.
PDCS	24.03	Ptarmigan Riverside	DP9	<p><u>Relationship with S.106 Agreements</u></p> <p>The Charging Authority does not appear to have considered the rates set in the PDCS with recent historic Section 106 obligations that have been secured. Clearly, whilst this need not be deterministic of the appropriate level for CIL, it would be a useful indicator of the reasonableness of proposed CIL rates and, importantly, their likely effect on development viability. This is particularly the case given many developments within the Charging Authority's area would have recently been the subject of thorough independent viability assessment in accordance with Development Plan policies. Should the CIL rates be set at a level substantially higher than historic Section 106 obligations then this would raise very serious questions as to assumptions made by the Charging Authority and, clearly, would require very robust evidence to justify the inference that development can afford to contribute and pay more.</p>	Recent/historic S106s and appraisals	The Council has carried out an examination of a large number of schemes to compare S106 with theoretical CIL and has concluded that the proposed CIL charge rate are reasonable in comparison. See DCS supporting document.
PDCS	24.04	Ptarmigan Riverside	DP9	<p>It is unclear from the evidence base what assumptions the Charging Authority has made about the Section 106 costs that would normally be expected for future development: it is not dealt with as a topic adequately within the Viability Assessment. We suspect that very little residual Section 106 costs have been allowed for: the blanket assumption being that Section 106 will be scaled back significantly once the Charging Schedule comes into effect. It is our opinion that this is at odds with how development will be delivered, and a more cautious approach to the 'scaling back' of Section 106 should be assumed.</p>	S106 costs	<p>The DCS viability appraisals have an allowance of £1,000/dwelling for minor S106 costs. It is assumed that any remaining major site specific costs would be taken from the viability study's overage (residual land value minus benchmark land value) in addition to CIL.</p> <p>The south zone appraisals show that there would be considerable overage remaining after CIL.</p>
PDCS	24.05	Ptarmigan Riverside	DP9	<p>The Roger Tym & Partners Viability Assessment which supports the PDCS is understood to be complemented by the Development Infrastructure Funding Study (DIFS) prepared to inform the emerging South Fulham Riverside Regeneration Area SPD. The DIFS Study has been prepared to understand infrastructure needs to support the identified levels of growth in the South Fulham Riverside area, and to examine the viability of mixed use developments in the area. The DIFS Study subsequently identifies a list of infrastructure requirements totalling approximately £83 million, arising as a result of the full programme of development within the Regeneration Area.</p> <p>It is therefore assumed that the proposed CIL charge for the South charging zone (within which Albert and Swedish Wharves are located) will cover all of the infrastructure requirements as set out within the DIFS Study, with no requirement for further S.106 contributions to be provided. However, we are unclear whether this would be the case as the Infrastructure Plan (September 2012), infers in Appendix 2 that some items, including highways improvements and the Thames Path, could be S.106 items. The implication of funding major infrastructure works under S.106 in addition to CIL contributions would have significant implications on the ability of schemes to delivery affordable housing, and such an approach requires careful consideration to fully understand its impact.</p>	S106	<p>The DCS viability appraisals have an allowance of £1,000/dwelling for minor S106 costs. It is assumed that any remaining major site specific costs would be taken from the viability study's overage (residual land value minus benchmark land value) in addition to CIL.</p> <p>The south zone appraisals show that there would be considerable overage remaining after CIL.</p>
PDCS	24.06	Ptarmigan Riverside	DP9	<p>One infrastructure improvement within the SFR Regeneration Area is the improvement of the junction at Carnwath Road/Townmead Road and Wandsworth Bridge Road. The Jacobs' Transport Study which supports the Draft SFR SPD identifies that the Council's preferred highways improvement scheme at this critical junction is wholly reliant on land take from Ptarmigan Riverside AW LLP interests.</p>	Carnwath Road/Townmead Road and	The CIL Regulations permit payment of CIL in kind by a land transfer, in principle. It is not appropriate to comment on the particular case.

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				As identified in previous representations on the SFR SPD, where sites are subject to land take, this will inevitably impact upon the financial viability of redeveloping affected sites, and the level of contributions wiaand affordable housing which can be delivered through their redevelopment. It is therefore requested that should land take be required from Ptarmigan's land holding as part of any junction improvement works that this be recognised as a payment in kind under S.73 of the CIL regulations or that the value of the land be taken into account in an accompanying viability assessment.	Wandsworth Bridge Road junction infrastructure	
PDCS	25.01	Capital and Counties	DP9	<u>LETTER</u> Overall, the representations demonstrate that the PDCS is based on inappropriate evidence. It would put at risk the viability of development and, in turn, Borough-wide Development Plan objectives. Capco consider that important further work needs to be undertaken by the Charging Authority to ensure any CIL rates are set in the knowledge that the deliverability of the Development Plan is not put at risk. This is especially the case in relation to the Earls Court & West Kensington Opportunity Area.	General viability and deliverability	Further viability work has taken place in preparing the DCS.
PDCS	25.02	Capital and Counties	DP9	Capco is willing to aid the Charging Authority, as consultee and major stakeholder, in additional viability work and analysis prior to the publication of any further CIL Charging Schedule. Capco would like a meeting to be arrange with relevant representatives of the Charging Authority and their agents in order to discuss the points raised in these representations.	Meeting	Meeting held
PDCS	25.03	Capital and Counties	DP9	<u>REPRESENTATIONS</u> 1.3 A summary of the key points contained in these representations is, as follows: <ul style="list-style-type: none"> The starting point of our review of the PDCS is the assumption that the Charging Authority has determined that the schedule of CIL rates contained in the PDCS reflects an appropriate balance between helping to fund necessary infrastructure and the potential effects on the economic viability of development across its area. The basis of our review has been the PDCS and its supporting evidence. In determining the nature of development to be assessed we have taken this to mean the development which underpins the relevant up-to-date Development Plan. This is consistent with the independent examination of Charging Schedules to date, is in accordance with statutory guidance on CIL (CLG 'Charge Setting and Charging Schedule Procedures' (2010)), and is aligned with the National Planning Policy Framework (paragraph 175). In the context of the above, our representations have focused on ascertaining the appropriateness of the Roger Tym & Partners Viability Assessment and the extent to which this has considered the effect of setting CIL rates on the viability of Development upon which the Development Plan is dependent. The appropriateness of the Viability Assessment has been considered in relation to the tests for the adequacy of evidence as provided in statutory guidance. The Development Plan in this instance is the adopted London Plan (2011) and the adopted LBHF Core Strategy (2011). The Development Plan objectives and policies are focused on the delivery of new homes and economic growth. Underpinning this aim are the designated Opportunity Areas (regionally) and Regeneration Areas (locally). These resemble the strategic brownfield sites capable of achieving strategic land use change and significant new homes and of the housing targets as set out in the Core Strategy (Policy H1). Serious impacts on the viability and delivery of the Opportunity and Regeneration Areas will, therefore, have serious impacts on the deliverability of the Development Plan as a whole. ECWKOA is designated in the London Plan (Policy 2.13 and Annex 1 (ref 8)) and makes up the majority of the Fulham Regeneration Area as designated in the LBHF Core Strategy (Policies FRA and FRA1). It is particularly reflective of the development advocated by the Development Plan (it meets key strategic objectives, inter alia: comprehensive regeneration; increasing housing supply; maximising economic growth / job opportunities; and regeneration of Council housing estates). It is considered that the Charging Authority does not have appropriate, reliable or 'fit for purpose' evidence upon which to determine robust CIL rates and inform the Charging Schedule. Capco recognise that the test of viability is a broad one and needs to provide high level assurance that the proposed CIL rates are set at 	ECWKOA: General	The DCS proposes a differential rate for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.

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				<p>a level that is compatible with the likely economic viability and deliverability objectives of the Development Plan. We are concerned that Roger Tym & Partners Viability Assessment does not provide the Charging Authority with the assurance it needs in order to not put at serious risk the Development Plan objectives. The current PDCS does not, therefore, provide an appropriate basis for the future application of CIL.</p> <p>We are of this opinion that the Viability Assessment is not 'fit for purpose', and contrary to statutory guidance, for the following reasons:</p>		
PDCS	25.04	Capital and Counties	DP9	<ul style="list-style-type: none"> It has not taken proper account of the Development Plan, in particular the nature of development that underpins its key objectives (the Opportunity and Regeneration Areas) in terms of both the delivery of new homes as well as regeneration / renewal of existing Council housing estates. In this respect it is at odds with paragraph 174 of the National Planning Policy Framework which identifies the need for planning authorities to assess the likely cumulative impacts on development in their area of all existing and proposed standards and policies. It is based upon an analysis of hypothetical schemes (no greater than 50 residential units) that are not reflective of the Development Plan. While we appreciate that CIL cannot make allowance for every possible site specific circumstance, it must in this instance, be set on the basis of a robust viability assessment of the Opportunity and Regeneration Areas i.e. substantial mixed use schemes. The material is readily available for such an assessment to be undertaken. There is no logical reason put forward within the Viability Assessment as to why no scheme delivering over 50 units has been appraised. 	Large sites Mixed uses	The Viability Study has a specific appraisal for ECWK.
PDCS	25.05	Capital and Counties	DP9	<ul style="list-style-type: none"> The 'overage' (i.e. margin of viability) determined by the Viability Assessment is inappropriate. It is not based upon viability inputs or assumptions that are reflective of the type of development underpinning the Development Plan. In the case of ECWKOA, for example, the inputs and assumptions are orders of magnitude apart. 	ECWKOA: Assumptions	The DCS proposes a differential rate for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
PDCS	25.06	Capital and Counties	DP9	<ul style="list-style-type: none"> Undertaking a notional 500 unit scheme appraisal – i.e. more in tune with the size of scheme to come forward in line with the Development Plan – causes a substantially reduced potential overage available for CIL. 	ECWKOA: General viability	The DCS proposes a differential rate for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
PDCS	25.07	Capital and Counties	DP9	<ul style="list-style-type: none"> Evidence of LBHF's record in recent years regarding the nature and extent of Section 106 obligations does not appear to have been considered. 	Recent/historic S106s and appraisals	The Council has carried out an examination of a large number of schemes to compare S106 with theoretical CIL and has concluded that the proposed CIL charge rate are reasonable in comparison. See DCS supporting document.
PDCS	25.08	Capital and Counties	DP9	<ul style="list-style-type: none"> It is unclear from the PDCS and its evidence base what assumptions the Charging Authority has made about future Section 106 costs. There is no evident consideration of what is – and will continue to be – a vitally important development cost. We urge the Charging Authority to take a realistic and justified approach to the likelihood of future Section 106 costs. A cautious approach is recommended because the Regulations are clear that Section 106 obligations are to remain the primary means of mitigating the direct impacts of development, especially for the type of development underpinning the Development Plan in this case. As already mentioned, ECWKOA is reflective of the Development Plan and analysis would indicate that its Section 106 costs will remain substantial with limited 'scaling back' as a result of CIL. 	S106 costs R123 list In-kind provision of infrastructure	The DCS proposes a differential rate for ECWKOA of £0 based on a viability assessment of the whole area and taking account of S106 costs.
PDCS	25.09	Capital and Counties	DP9	<ul style="list-style-type: none"> The Viability Assessment does not utilise all relevant available evidence. In the case of ECWKOA, for example, the evidence base to LBHF's recently adopted Supplementary Planning Guidance for the area includes a report prepared by DVS titled Development Infrastructure Funding Study: Viability Assessments of Each Development Capacity Scenario (2011). This report examines the nature, type, timing and viability of development proposed for the ECWKOA. Its inputs and assumptions are substantially different to those made by the Roger Tym & Partners Viability Assessment. This illustrates Capco's concern at the underlying approach and methodology informing PDCS. 	ECWKOA: Assumptions	The DCS proposes a differential rate for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.

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PDCS	25.10	Capital and Counties	DP9	<ul style="list-style-type: none"> An analysis of ECWKO, for example, casts serious doubt over the margins of viability that form the basis of the CIL rates recommended by the Viability Assessment. In fact, the application of CIL to ECWKO would indicate that development viability is insufficient to absorb the level of rates put forward in the PDCS. In other words, the PDCS rates would render ECWKO unviable. This is a significant concern because as a consequence the PDCS rates, should they come into effect, would have a significant impact on the delivery of both new housing and housing estate renewal in line with the Development Plan. A differential CIL rate for ECWKO could be justified on the basis of the points set out in these representations. 	ECWKO: General viability	The DCS proposes a differential rate for ECWKO based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
PDCS	25.11	Capital and Counties	DP9	<p>1.4 Overall, in light of the above points, Capco is of the firm opinion that the Charging Authority has not complied with its legal obligation to strike an appropriate balance between helping to fund necessary infrastructure and the potential effects on the economic viability of development across its area.</p> <p>1.5 Essentially, the evidence base is not consistent with the Development Plan. The Charging Authority has not properly identified or assessed the potential effects of CIL on the economic viability of development in strategically important Opportunity Areas / Regeneration Areas, without which the achievement of Borough-wide Development Plan policies and objectives will not be possible.</p> <p>1.6 Capco consider that important further work needs to be undertaken by the Charging Authority to ensure any CIL rates are set in the knowledge that the deliverability of the Development Plan is not put at risk. Specifically in relation to ECWKO there is overwhelming case presented in these representations that the relevant rates put forward in the PDCS will put development at serious risk and, in turn, jeopardise the Council's strategic Development Plan objectives. Following completion of further work it is likely that a specific CIL rate should be applied to ECWKO (different to that for the wider Central Zone). In this respect Capco note that a differential rate for ECWKO would be in accordance with the methodology stated by Roger Tym & Partners at paragraphs 2.22 to 2.25 of the Viability Assessment.</p>	ECWKO: General	The DCS proposes a differential rate for ECWKO based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
PDCS	25.12	Capital and Counties	DP9	1.7 Capco is willing to aid the Charging Authority, as consultees and major stakeholders, in additional viability work and analysis prior to the publication of any further CIL Charging Schedule. Capco would like a meeting to be arranged with relevant representatives of the Charging Authority and their agents in order to discuss the points raised in these representations and assist the Charging Authority in devising a CIL rate that mitigates against any adverse impact on viability, which could result in Development Plan objectives not being realised.	Meeting	Meeting held
PDCS	25.13	Capital and Counties	DP9	2.12 It is worth highlighting that the Infrastructure Plan has been reviewed. Whilst it is useful, and is assumed to form the basis of the list of infrastructure projects referred to in Regulation 123, there is no requirement for the Regulation 123 list to be published and examined at the same time as the Charging Schedule. Unfortunately this means that, at this stage, developers have no definite or reliable knowledge about the nature of infrastructure that will be funded through CIL.	R123 list	Following revisions to CIL Regulations, a draft R123 list is appropriate evidence to inform the preparation of the DCS.
PDCS	25.14	Capital and Counties	DP9	<p><u>Definition of development for the purpose of testing economic viability</u></p> <p>3.1 The CIL Regulations require a Charging Authority, when setting CIL rates, to strike an appropriate balance between the desirability of funding from CIL the cost of infrastructure and the potential effects of CIL on the economic viability of development across its area.</p> <p>3.2 A key starting point, therefore, in applying the above tests is an understanding of development across the Charging Authority's area. In our opinion, this ought to be derived from the relevant up-to-date Development Plan. This being consistent with the approach taken to the independent examination Charging Schedule to date. The evidence should be able to conclude that the proposed CIL rate(s) will be viable for the sufficient number and type of developments upon which the Development Plan relies over the course of the Plan period. In other words, the evidence must enable the Charging Authority to reliably and robustly conclude whether the impact of CIL would be to render the Development Plan undeliverable.</p> <p>3.3 In this case, the Development Plan comprises the adopted London Plan (2011) and the adopted LBHF Core Strategy (2011). Underpinning the regional spatial strategy set out in the London Plan and supporting regional</p>	Large sites Mixed uses	The Viability Study has an expanded range of sample sites that includes two large mixed use schemes in each zone, together with appraisals for White City East. In addition, there is a specific appraisal for the ECWK SPD area.

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Page 306				<p>housing targets, are the Opportunity Areas. These are London's major reservoir of strategic brownfield development and regeneration sites, with the potential to deliver strategic land use change and provide substantial new homes and jobs. This is also true of the LBHF Core Strategy which is essentially underpinned by the designated Opportunity Areas / Regeneration Areas. Strategic Policy A of the Core Strategy states:</p> <ul style="list-style-type: none"> The Council will focus and encourage major regeneration and growth in the key Regeneration Areas. The Regeneration Areas could provide at least 13,200 additional dwellings and 25,000 jobs during the Plan period to 2031. <p>3.4 Typically the nature and type of development schemes associated with Opportunity Areas / Regeneration Areas are large scale, mixed use, multi phased and often require significant up front enabling / infrastructure costs.</p> <p>3.5 In the context of the above, in setting CIL rates the Charging Authority must be primarily concerned with the safeguarding of the Opportunity Areas / Regeneration Areas against any serious viability risk. In Capco's opinion, this must be the fundamental underlying objective because for any of the Opportunity Areas / Regeneration Areas to be put at serious risk, would pose consequential material adverse effect on the deliverability of the Development Plan i.e. in CIL terms, development across the Charging Authority's area.</p> <p>3.6 Roger Tym & Partners have undertaken a Viability Assessment to test the impact of CIL. The Viability Assessment details the policy context associated with the Charging Authority's area and, on page 5, sets out the indicative housing targets as derived from the Core Strategy. It demonstrates that the Opportunity Areas / Regeneration Areas make up 92% of the Core Strategy housing targets. This clearly confirms the fundamental importance of the Opportunity Areas / Regeneration Areas to the delivery of new homes in line with the Development Plan.</p> <p>3.7 Roger Tym & Partners have tested the impact of CIL in three areas within the Borough, which include the South Charging Zone, North Charging Zone and the Central Charging Zone. However, the Viability Assessment has only tested the impact of CIL on two development types – 10 residential units and 50 residential units – to determine whether a surplus (termed by Roger Tym & Partners in their study as 'overage') is available to fund a CIL payment, recognising it is imperative that the CIL rate provides a sufficient buffer to mitigate any impact on viability due to site-specific circumstances. The approach taken is inappropriate as it does not reflect the nature or type of development that underpins the delivery of the Development Plan (i.e. the Opportunity Areas / Regeneration Areas). This is illustrated by looking specifically at the circumstances associated with the ECWKOA (see below). The approach taken by Roger Tym & Partners does not comply with the CLG's statutory guidance. Representative development scenarios which reflect Development Plan policies and allocations for Opportunity Areas / Regeneration Areas have not been selected or assessed. Therefore, the proposed CIL rates cannot be said to be "informed by" appropriate available evidence.</p> <p>3.8 Capco is concerned that the Charging Authority is unable to draw any relevant or reasonable conclusions as to the risk posed to the Opportunity Areas / Regenerations Areas – and, therefore, the Development Plan – on the basis of the Roger Tym & Partners Viability Assessment.</p>		
	PDCS	25.15	Capital and Counties	DP9	<p><u>Earls Court & West Kensington Opportunity Area (Fulham Regeneration Area): Viability Inputs and Assumptions</u></p> <p>3.9 ECWKOA sits within the Central Area for the purposes of the CIL Viability Assessment and resulting PDCS. ECWKOA makes up a minimum of 24% of Development Plan housing targets as defined by Policy H1 of the LBHF Core Strategy. However, the combination of the Seagrave Road planning permission and Earls Court Main Site (LBHF) resolution to grant (see paragraph 2.5) results in 6,653 residential units. This equates to 46% of Core Strategy housing targets.</p> <p>3.10 In addition to the delivery of substantial new homes, the ECWKOA includes the phased comprehensive redevelopment of existing Council owned West Kensington and Gibbs Green housing estates in line with strategic Development Plan objectives. It is worth emphasising the importance of the redevelopment of the housing estates to</p>	ECWKOA: Assumptions

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				<p>the deliverability of the ECWKOA – they are intrinsic and central to it.</p> <p>3.11 Clearly, ECWKOA comprises potential substantial delivery of new homes and jobs, a broad mix of uses and essential estate regeneration, reflecting the strategic priorities identified in the Development Plan, which should be safeguarded from any adverse impact on economic viability caused by the application of CIL.</p> <p>3.12 In March 2012 LBHF adopted a Supplementary Planning Document for the . The evidence base to this document includes a report by DVS titled Development Infrastructure Funding Study: Viability Assessments of Each of the Development Capacity Scenarios ('DIF Study') (November 2011). This document examines the nature, type and timing of development proposed. Surprisingly, Roger Tym & Partner's Viability Assessment makes no reference to the DIF Study. This is concerning as the inputs and assumptions set out in the DIF Study are substantially different to those made by the Roger Tym & Partners Viability Assessment. This illustrates Capco's concern at the underlying approach and methodology informing PDCS.</p> <p>3.13 It is clear from the above that the Roger Tym & Partners Viability Assessment has not used or relied upon all available evidence. When robustly testing the impact of the imposition of CIL, it is critical that the inputs and assumptions used are reasonable and the best available. Therefore, it is concerning that the Roger Tym & Partners Viability Assessment has not applied uniform inputs and assumptions to those applied in the DIF Study. Capco has undertaken a comparison of the inputs and assumptions associated with the DIF Study and compared these to the inputs and assumptions applied to the Viability Assessment (for a 50 unit apartment scheme development appraisal within the Central Area, at Appendix 4.5 of the Viability Assessment). Some of the key differences in assumptions are set out below:</p> <p>Table 1:</p> <table border="1"> <thead> <tr> <th>Viability Input</th> <th>Roger Tym & Partners Viability Assessment Assumption</th> <th>ECWKOA DVS DI</th> </tr> </thead> <tbody> <tr> <td>Gross: net ratio</td> <td>85%</td> <td>70%</td> </tr> <tr> <td>Private Residential Sales Revenue</td> <td>£6,400 per sq metre</td> <td>£11,000 per sq me</td> </tr> <tr> <td>Affordable Housing Revenue (blended rate)</td> <td>£2,700</td> <td>£2,260</td> </tr> <tr> <td>Private Build Cost rate</td> <td>£1,900 per sq metre</td> <td>£2,379 per sq met</td> </tr> <tr> <td>Contingency on all build costs</td> <td>5%</td> <td>3%</td> </tr> <tr> <td>Professional Fees</td> <td>8%</td> <td>10%</td> </tr> <tr> <td>Sustainability costs to reach Code Level 3</td> <td>-</td> <td>£3,500 per unit</td> </tr> <tr> <td>Infrastructure and Abnormals</td> <td>£66,000</td> <td>£1,941,941 (£601.</td> </tr> <tr> <td>Contingency on infrastructure and abnormals</td> <td>-</td> <td>3%</td> </tr> <tr> <td>Professional fees on infrastructure and abnormals</td> <td>-</td> <td>8%</td> </tr> <tr> <td>Other plot related costs (e.g. over-sailing costs, building regs, NHBC fees, etc)</td> <td>-</td> <td>£163,450 £3,269 per unit</td> </tr> <tr> <td>Marketing and Letting fees</td> <td>£120,000 for the whole scheme</td> <td>1.5% of sales reve</td> </tr> <tr> <td>Disposal Fees:</td> <td></td> <td></td> </tr> <tr> <td>Sales agent fees</td> <td>1.25%</td> <td>1% of sales reven</td> </tr> <tr> <td>Legal fees</td> <td>£30,000 across the scheme</td> <td>0.5% of sales reve</td> </tr> </tbody> </table> <p>3.14 The impact of replacing the Roger Tym & Partners assumptions with those used by the DVS on the findings of the Viability Assessment are significant: the differences in assumptions are order of magnitudes apart. When applying DVS's assumptions on a 50 unit apartment scheme in the Central Charging Zone and assuming 40% affordable housing, the residual land value generated is significantly lower that that reported in the Roger Tym & Partners Viability Assessment. The potential 'overage' available for CIL is reduced from £405 to £11 per sqm.</p> <p>3.15 As the Roger Tym & Partners Viability Assessment has failed to test residential schemes delivering more than 50</p>	Viability Input	Roger Tym & Partners Viability Assessment Assumption	ECWKOA DVS DI	Gross: net ratio	85%	70%	Private Residential Sales Revenue	£6,400 per sq metre	£11,000 per sq me	Affordable Housing Revenue (blended rate)	£2,700	£2,260	Private Build Cost rate	£1,900 per sq metre	£2,379 per sq met	Contingency on all build costs	5%	3%	Professional Fees	8%	10%	Sustainability costs to reach Code Level 3	-	£3,500 per unit	Infrastructure and Abnormals	£66,000	£1,941,941 (£601.	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Page 308				<p>units, Capco has run an additional appraisal for a hypothetical 500 unit scheme (more akin to the type and nature of development associated with the Development Plan strategic policies and objectives). The viability test has simply increased the revenue and costs assumed for a 50 unit scheme proportionately as well as made reasonable assumptions on programme. The table below demonstrates the difference in results for both a 50 and 500 unit scheme, assuming 40% affordable housing (i.e the Core Strategy policy target), when applying Roger Tym & Partners assumptions in comparison to the results generated when applying DVS's assumptions.</p> <p>Table 2:</p> <table border="1"> <thead> <tr> <th>Appraisal</th> <th>Number of units</th> <th>Gross Chargeable sq m</th> <th>Residual Land Value Per ha</th> <th>Benchmark Land Value per hectare</th> <th>Overage Per ha</th> </tr> </thead> <tbody> <tr> <td>Roger Tym & Partner assumptions</td> <td rowspan="2">50 units</td> <td>2,280</td> <td rowspan="2">£10,799,722</td> <td rowspan="2">£8,000,000</td> <td>£2,799,722</td> </tr> <tr> <td>DVS assumptions</td> <td>2,736</td> <td>£88,054</td> </tr> <tr> <td>Roger Tym & Partner assumptions</td> <td rowspan="2">500 units</td> <td>22,800</td> <td rowspan="2">£8,198,070</td> <td rowspan="2"></td> <td>£198,070</td> </tr> <tr> <td>DVS assumptions</td> <td>27,360</td> <td>£6,011,467</td> <td>£-1,988,530</td> </tr> </tbody> </table> <p>3.16 By testing the viability of a 500 unit scheme, we are able to demonstrate the cumulative impact CIL has on a larger development scheme and the serious risk posed to viability. The results demonstrate that the proposed CIL rate for the Central Charging Zone is significantly over-optimistic relative to the circumstances of ECWKOA: a differential CIL rate for ECWKOA could be justified.</p> <p>3.17 The above findings suggest that the Charging Authority cannot currently ascertain with any robustness from the Roger Tym & Partners Viability Assessment, whether or not there is a sufficient margin of viability for the proposed PDCS rates to be achieved without putting development of ECWKOA at risk.</p> <p>3.18 Capco would welcome the opportunity to work with the Charging Authority and Roger Tym & Partners in establishing the impact on viability, specifically in ECWKOA as a result of the PDCS proposed rates.</p>	Appraisal	Number of units	Gross Chargeable sq m	Residual Land Value Per ha	Benchmark Land Value per hectare	Overage Per ha	Roger Tym & Partner assumptions	50 units	2,280	£10,799,722	£8,000,000	£2,799,722	DVS assumptions	2,736	£88,054	Roger Tym & Partner assumptions	500 units	22,800	£8,198,070		£198,070	DVS assumptions	27,360	£6,011,467	£-1,988,530		
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PDCS	25.16	Capital and Counties	DP9	<p><u>'Overage'</u></p> <p>3.19 The above section highlighted Capco's concern as to the appropriateness / relevance of the viability inputs and assumptions used by Roger Tym & Partners in the context of the type and nature of development, such as ECWKOA, underpinning the Development Plan. Notwithstanding this concern, Capco has undertaken an exercise to understand the potential impact of the PDCS rates if applied to the ECWKOA.</p> <p>3.20 As explained in paragraphs 3.9 and 3.10, ECWKOA is vital to the delivery of strategic Development Plan policies and objectives: specifically, in relation to the delivery of substantial new homes and the regeneration of existing Council housing estates. The redevelopment of the Council housing estates is central to the Development Plan policy objectives for ECWKOA.</p> <p>3.21 The table below applies assumptions based upon the Roger Tym & Partners Viability Assessment and the Development Plan requirement to deliver comprehensive estate regeneration in order to generate £ per sqm rate for ECWKOA.</p> <p>Table 3:</p> <table border="1"> <tbody> <tr> <td>Community Infrastructure Levy – Borough*</td> <td>£144,566,532</td> </tr> <tr> <td>Community Infrastructure Levy – Mayoral</td> <td>£42,763,500</td> </tr> </tbody> </table>	Community Infrastructure Levy – Borough*	£144,566,532	Community Infrastructure Levy – Mayoral	£42,763,500	ECWKOA: General viability	The DCS proposes a differential rate for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.																					
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Stage	Rep #	Organisation	Agency	Representation	Issue	Response						
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Total	£350,320,032											
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PDCS	25.17	Capital and Counties	DP9	<p><u>Failure to consider mixed use development</u></p> <p>3.24 Capco is concerned that the Roger Tym & Partners Viability Assessment ignores mixed use development: a key policy objective for the Opportunity Areas / Regeneration Areas.</p> <p>3.25 Therefore, the approach taken to setting the PDCS rates, which sees each land use considered in isolation with no consideration to the implication of mixed use development, results in CIL rates being promoted for high value uses (i.e. residential) with no consideration as to the viability impact of delivering development in accordance with a key Development Plan policy requirement. For example, the implication for mixed use developments where some uses (e.g. office, culture, community) require cross-subsidy from residential has been ignored by the Viability Assessment. The consequence of this is that the proposed residential CIL rates for residential use are overstated. Because of this Capco recommend that the Charging Authority consider revising the viability margin/buffer ('overage') to reflect the differences between single use/contained sites and mixed use/regeneration sites within the Opportunity Areas / Regeneration Areas.</p>	Mixed uses	The Viability Study has an expanded range of sample sites that includes two large mixed use schemes in each zone, together with appraisals for White City East. In addition, there is a specific mixed use appraisal for the ECWK SPD area.						
PDCS	25.18	Capital and Counties	DP9	<p><u>Uncertain Relationship between PDCS and future Section 106 obligations</u></p> <p>3.26 The evidence base takes an inappropriate approach to future Section 106 costs. It unclear what standard assumptions the Charging Authority has made about the Section 106 costs that would normally be expected for future development – and any relationship between assumed costs and the consistency of these with the delivery mechanisms noted in the Infrastructure Plan. Overall, Section 106 costs are not dealt with as a topic adequately within the Viability Assessment. There is no evidence of any proper analysis or approach to residual Section 106 costs and the relationship of these to the available viability 'overage'. It is concerning that the Opportunity Areas / Regeneration Areas do not appear to have been properly considered. The inference of the Viability Assessment is that future Section 106 will be scaled back significantly once the Charging Schedule comes in to effect. It is Capco's considered opinion that this is at odds with the future 'normal circumstances' associated with how development will be delivered – especially in the case of Opportunity Areas / Regenerations – and a more cautious approach to the 'scaling back' of Section 106 should be assumed. This is because:</p> <ul style="list-style-type: none"> Section 106 (and planning conditions) are to remain the primary means of mitigating the direct impacts of development (it is worthy of note in this regard that the statutory tests for Section 106 planning obligations set in Regulation 122 are in effect the same as those that were provided in guidance in Circular 5/2005). Because Section 106 continues to be the means through which direct impacts are mitigated, it follows that 	S106 costs R123 list In-kind provision of infrastructure	The DCS proposes a differential rate for ECWKOAs of £0 based on a viability assessment of the whole area and taking account of S106 costs.						

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				<p>Section 106 commitments to infrastructure do not automatically legitimise a reduction in CIL. CIL is not intended to secure the mitigation of impacts from individual developments, so that Section 106 obligations which are necessary for a development (whether by way of money or infrastructure) have little to do with CIL.</p> <ul style="list-style-type: none"> • A charging authority should not normally assume that CIL is the appropriate way to provide infrastructure which is likely to be necessary for the development of individual sites or groups of up to 4 sites. Apart from risking double charging for such infrastructure, such an approach also runs risks for the robustness of planning decisions which approve development without securing a commitment to the provision of necessary infrastructure on the assumption that it will be provided through CIL. Planning permissions would be more secure if any necessary commitments were the subject of binding Section 106 obligations i.e. no material change to current circumstances. • The terms of Regulation 123 make it possible for authorities to continue to seek pooled payments towards a particular infrastructure project, or type of infrastructure from up to five developments. This is to cover the position, for instance, where a small number of developments collectively trigger the need e.g. for a new local school. Such payments for specific infrastructure projects remain legitimate under Section 106 – even if CIL is being charged more generally for ‘education’ as a type of infrastructure, provided that the specific infrastructure projects are excluded from the Regulation 123 list - and can be useful in enabling developments to come forward hand in hand with necessary infrastructure. • There are limited circumstances in which CIL can be paid in kind through land or infrastructure. Regulation 73 allows for the payment in kind of CIL but only through the provision of land and the Regulation specifically excludes such arrangements if the land is provided under the terms of a Section 106 obligation. <p>3.27 The likely need for developments to commit to significant items of infrastructure under Section 106 without offsetting or relief should be fully taken into account at the CIL setting stage and an assessment of the extent of this infrastructure should form an integral part of the CIL rate setting. This is especially the case for strategic sites – such as ECWKOA – where typically significant investment in infrastructure is required to both enable and mitigate development. Due to the points set out above, a broadbrush assumption that infrastructure will almost now wholly be paid for through CIL – as opposed to Section 106 – is inadequate and unrealistic given the nature of sites making up the majority of the Development Plan (large scale strategic brownfield sites). This uncertainty puts a serious risk the deliverability of schemes. In this respect, it is important to highlight that the PDCS rates and the Viability Assessment are inconsistent with the assumptions in the Infrastructure Plan about the use of Section 106 as the proposed delivery mechanism. The PDCS rates do not appear to be informed by or consistent with the evidence on likely Section 106 costs in the Infrastructure Plan.</p> <p>3.28 Capco is in the process of negotiating a Section 106 Agreement with LBHF (and other relevant parties) in relation to the current Earls Court Main Site planning application (ref. 2011/02001/OUT). The Heads of Terms associated with this Agreement are included in the LBHF Officer’s Report to Committee of 12th September 2012. They include a combination of substantial in-kind works and financial contributions of a total cost of circa £93m (excluding affordable housing and estate regeneration), as follows:</p> <ul style="list-style-type: none"> • Highway works. • On-site public open space and off-site public realm improvements. • Public transport improvements, including: improvements to West Kensington and West Brompton Stations; improvements to bus services and provision of bus infrastructure; cycle route improvements and provision of extension to Mayor’s cycle hire network; Travel Plan measures; and a contingency fund. • Social infrastructure provision, including: provision of primary school; provision of day nursery facilities; provision of community space; provision of health facility; provision of leisure facility; contribution to secondary education. • Provision of cultural space / facility. • Local employment and training strategy and related fund. • Provision of energy infrastructure. • Monitoring. 		

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PDCS	25.19	Capital and Counties	DP9	<p>3.29 Capco would like to work with the Charging Authority to analyse the above Heads of Terms and consider the likelihood for items to be 'scaled back' were LBHF CIL to take effect. On the basis of an initial broad analysis undertaken by Capco, it is expected that 'scaling back' of the above items would be limited and the majority would remain to be delivered through Section 106. This is because of the various reasons explained in the bullet points above (paragraph 3.26), especially because a substantial proportion of the items are required on-site and to be delivered by the developer. As a headline this appears to cast significant doubt over the broad assumption the Charging Authority make at paragraph 1.2.13 of the Infrastructure Plan</p> <p>3.30 Essentially, Capco consider that the combination of CIL and Section 106 for ECWKOA would not lead to equivalent total contributions as at present (i.e. the scaling back of Section 106 would be minimal) and could be equivalent to c. £100 per sqm being placed on development, which if added to the £400 per sqm (referred to in paragraph 3.22) would be equivalent to £500 per sqm.</p> <p>3.31 The lack of clarity between CIL and Section 106 within the evidence base, is of serious concern and is potentially a significant risk to the future viability of development. The conclusion drawn, at this stage, is the proposed CIL rates would result in a significant net additional cost to strategic development, such as ECWKOA. The inference, therefore, is that the Charging Authority consider that development can sustain more cost when economic market conditions remain fragile. Capco do not consider this to be sustainable and urge the Charging Authority not to make unrealistic assumptions about the extent to which Section 106 will be reduced as a result of CIL.</p> <p>3.32 As a final point on this matter, we are concerned that the inference of the Viability Assessment is that the Charging Authority will be able to 'flex' Section 106 should, on a case by case basis, development be unviable taking into account CIL. This is directly opposed to Regulation 122: because Section 106 obligations will be required for matters which are 'necessary' to make development acceptable in planning terms, the Charging Authority must not assume that those obligations can be easily flexed to make development viable.</p>		
				<p><u>Lack of Consideration of historic Section 106 obligations</u></p> <p>3.33 The Charging Authority does not appear to have considered the rates set in the PDCS with recent historic Section 106 obligations that have been secured. Clearly, whilst this need not be deterministic of the appropriate level for CIL, it would be a useful indicator of the reasonableness of proposed CIL rates and, importantly, their likely effect on development viability. Without appropriate benchmarking it is surely difficult for the Charging Authority to properly take into account the change in development costs arising from proposed CIL charges. This is particularly the case given many developments within the Charging Authority's area would have recently been the subject of thorough independent viability assessment in accordance with Development Plan policies. Should the CIL rates be set at a level substantially higher than historic Section 106 obligations then this would raise very serious questions as to assumptions made by the Charging Authority and, clearly, would require very robust evidence to justify the inference that development can afford to contribute and pay more.</p>	Recent/historic S106s and appraisals	The Council has carried out an examination of a large number of schemes to compare S106 with theoretical CIL and has concluded that the proposed CIL charge rate are reasonable in comparison. See DCS supporting document.
				<p><u>Other Comments</u></p> <p>3.34 Capco would like to highlight the following additional specific comments in relation to the PDCS:</p> <ul style="list-style-type: none"> Instalments Policy: The Charging Authority has not decided whether to introduce an instalments policy. This is at odds with the advice of Roger Tym & Partners set out at paragraph 6.1 of the Viability Assessment. This states that "the instalments policy can have a significant impact on the deliverability of development. An overly aggressive policy which seeks a large proportion of total CIL liability from a development at an early stage can potentially make the difference between whether a scheme is viable or not." Capco request the Charging Authority's assumptions and proposals for instalments, to establish whether or not they are 'overly aggressive' can be assessed. <p>It is acknowledged that the CIL Regulations require that developments that are the subject of outline planning permissions will be eligible for payments to be made in respect of individual phases. Therefore, it</p>	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.

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				is considered that the instalments policy should allow for longer payment periods of more instalments by agreement, in respect of development phases, which could cover a number of years or relate to a large number of residential units. Otherwise, there is a risk that such payments place onerous and premature demands on the project financing, particularly on cash flow, and potentially impede timely delivery of the development.		
PDCS	25.21	Capital and Counties	DP9	<ul style="list-style-type: none"> Revised Planning Obligations SPD: Capco note that paragraphs 1.2.13 to 1.2.15 of the PDCS explain that the Council is considering publishing a Planning Obligations SPD and anticipates consulting on this alongside the CIL Draft Charging Schedule. Capco agree that a Planning Obligations SPD should be prepared and consulted on simultaneously with the Draft Charging Schedule to ensure consistency of assumptions about development costs, viability and delivery mechanisms. 	Planning Obligations SPD	Comment noted. The S106 SPD will not now be produced in advance of CIL though an outline of the scope of future S106 is included in the DCS supporting document.
PDCS	25.22	Capital and Counties	DP9	<ul style="list-style-type: none"> Earls Court and West Kensington Opportunity Area Supplementary Planning Document ('SPD'): Capco note that paragraph 2.2.1 and figure 2.1 of the PDCS confirm that the SPD forms part of the background evidence for PDCS. These representations have clearly demonstrated (particularly at paragraph 3.12 and table 1) that the proposed CIL rates cannot be said to be informed by and consistent with the SPD. In fact, these representations demonstrate that the Development Plan objectives – and, therefore, the supplementary objectives and principles of the SPD – are put at serious risk by the PDCS. 	ECWKOA: General	The DCS proposes a differential rate for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
PDCS	25.23	Capital and Counties	DP9	<ul style="list-style-type: none"> Justification of Charging Zones: The evidence is unclear in explaining how the actual proposed rates and associated geographical zones have been arrived at. The zones would appear to bear no resemblance to planning policy designations which is concerning given designations associated with the Opportunity Areas / Regeneration Areas. It is Capco's strong opinion that the potential for distinct differences in viability within and outside all strategic Opportunity Areas / Regeneration Areas should have been considered, taking into account the abnormal costs commonly arising in such areas as demonstrated by these representations. 	ECWKOA: Central B Zone	Differential charging zones should be based on viability evidence not policy designations. However, a review of viability has led to the DCS having a differential charging zone for ECWKOA.
PDCS	25.24	Capital and Counties	DP9	<p><u>4.0 Conclusion and Way Forward</u></p> <p>4.1 Capco is of the firm and considered opinion that the Charging Authority has prepared its PDCS on the basis of inappropriate evidence (in the context of the Regulations and CLG's statutory guidance, 'Charge Setting and Charging Schedule Procedures'). Because of this, Capco is concerned that the rates set in the PDCS pose a serious risk to the viability and delivery of development across the Charging Authority's area.</p> <p>4.2 These representations have demonstrated that the evidence base – specifically the Roger Tym & Partners Viability Assessment is not consistent with the relevant adopted Development Plan. Specifically this is because the Charging Authority has not properly identified or assessed the potential effects of CIL on the economic viability of development in strategically important Opportunity Areas / Regeneration Areas, without which the achievement of Borough-wide Development Plan policies and objectives will not be possible.</p> <p>4.3 Capco consider that important further work needs to be undertaken by the Charging Authority to ensure any CIL rates are set in the knowledge that the deliverability of the Development Plan is not put at risk. Specifically in relation to ECWKOA there is an overwhelming case presented in these representations that the relevant rates put forward in the PDCS will put development at serious risk and, in turn, jeopardise the Council's strategic Development Plan objectives.</p> <p>4.4 On the basis of work undertaken to inform these representations, and in light of the key points raised above, we are of the opinion that a differential rate could be justified for ECWKOA. In this respect Capco note such an approach would be in accordance with the methodology stated by Roger Tym & Partners at paragraphs 2.22 to 2.25 of the Viability Assessment.</p>	ECWKOA: General	The DCS proposes a differential rate for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
PDCS	25.25	Capital and Counties	DP9	<p>4.5 Capco is willing to aid the Charging Authority, as consultees and major stakeholders, in additional viability work and analysis prior to the publication of any further CIL Charging Schedule. Capco would like a meeting to be arranged with relevant representatives of the Charging Authority and their agents in order to discuss the points raised in these representations.</p> <p>4.6 Capco reserve the right to provide further representations and evidence at subsequent stages in the preparation</p>	Meeting	Meeting held

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				of the Charging Schedule, including public examination.		
PDCS	26.01	Favour Well	Indigo Planning	<p>Favor Well Limited own the IBIS Hotel at 47 Lillie Road and surrounding lands which are strategically located between the Earls Court and West Kensington Opportunity Area to the north and the Fulham Regeneration Area to the south. Central B An application for these lands adjacent to the hotel is currently being considered by the London Borough of Zone Hammersmith and Fulham (LPA Ref.2012/03034/FULL). The application proposes:</p> <p><i>'Construction of 9 residential units ranging in height from 3 – 4 storeys, served by 11 car parking spaces and provision of replacement ancillary facilities and access to basement car park serving the adjacent hotel, landscaping and all associated works'</i></p> <p>The implementation of CIL in the Borough and potential impact on the viability of any future development proposals is therefore of great interest to Favor Well Limited who wish to ensure that any tariff is implemented fairly and appropriately.</p> <p><u>Evidence Base and Approach</u> DCLG guidance from 2010 CIL Guidance (Charge setting and charging schedule procedures) and Regulation 14 of the 2010 Regulations themselves are clear in stating that charging authorities:</p> <p><i>'must aim to strike ...an appropriate balance between –</i> <i>(a) the desirability of funding infrastructure from CIL the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding and;</i> <i>(b) the potential effects of the imposition of CIL on the economic viability of development across its area'</i></p> <p>Significantly, the Council's draft consultation document at para. 2.2.1 repeats this wording within the guidance and we welcome the Council's reiteration of the need to find a balance between funding infrastructure and not undermining the economic viability of development schemes that come forward in the Borough.</p> <p><u>The Preliminary Draft Charging Schedule</u> The proposed CIL charging rates for the borough are set out in Figure 5.1 in this section and at Figure 5.2 the charging zones are identified.</p> <p>We have identified our client's interests as being within the 'Central B' charging zone. We are satisfied that the Council has, in defining four geographical charging zones without undue complexity, considered economic viability and has been mindful of local conditions.</p> <p>We note the charge rate of £200 per sq metre proposed for residential development (Class C3/C4/HMO/Hostel) within the Central B zone. We have reviewed the Roger Tym and Partners accompanying Viability Assessment which provides the evidence base that underpins the proposed charging schedule and are satisfied that it represents a robust and relatively transparent approach to assessing viability.</p>	Residential	Support noted.
PDCS	26.02	Favour Well	Indigo Planning	<p>However the provision of 'live appraisals' comparing viability of residential development in a pre-CIL environment and viability of the same development subject to the CIL would have been helpful and would presumably help justify relevant proposed charge rates.</p>	Recent/historic S106s and appraisals	Appraisals for live / recent schemes are confidential and cannot be provided as part of the evidence base.
PDCS	26.03	Favour Well	Indigo Planning	<p>In addition further justification on how overage levels have been decided, with regard to residential development would be helpful.</p>	CIL as proportion of overage	The overage is the difference between residual land value (from the viability appraisals) and the benchmark land value.
PDCS	26.04	Favour Well	Indigo Planning	<p>We consider the proposed blanket charge across the borough of £80 per sq metre for all other uses which includes hotel development (Class C3) is too unrefined and does not reflect the nuances of the hotel market which would see a hotel room in Hammersmith Town Centre or Fulham Town Centre generally generate a higher level of income than otherwise similar rooms in locations such as Lillie Road where our client has a hotel operation. The proposed levy is therefore stated considered too high for this Central B zone and should be reduced in order to ensure a delivery of this specialised form of accommodation is not prejudiced in specific areas within the borough. The need for new visitor Hotels</p>	All uses	The viability of hotels has been reviewed and it is now proposed that there should be a £0 charge.

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				accommodation within the Borough is set out in the Core Strategy (Strategic Policy B) and locations (amongst others) such as the Earl's Court West Kensington Opportunity Area are identified as being appropriate for such uses. As identified earlier, our client's current application site is a few metres across Lillie Road from the southern boundary of the Opportunity Area.		
PDCS	26.05	Favour Well	Indigo Planning	<p><u>Calculation of CIL Charge</u></p> <p>We note the reference at 5.3.2 to method for calculating deductions and the provision of the definition of an 'existing building in lawful use' which is at paragraph 40 of the CIL Regulations 2010. Cross reference to exemption provisions at 1.1.5 of the PDCS ('What development will be liable for CIL?') may be appropriate.</p>	Cross-referencing	Will consider if necessary.
PDCS	26.06	Favour Well	Indigo Planning	<p><u>Other Considerations</u></p> <p>At 5.5.1 it is stated that the 'Council has not currently decided whether to introduce an instalment policy. It will consider whether to do so in the light of any decision by the Mayor of London to introduce an instalment policy for the Mayoral CIL, should the regulations allow'.</p> <p>We would contend that a reasonable instalment policy should be included from the outset in the arrangements. Both London Borough's that have in place existing CIL regimes (Redbridge and Wandsworth) allow payment by instalment under 69B of the CIL (Amendment) Regulations. Any decision by the Mayor in regard to an instalment policy on the Mayoral CIL is not likely to occur soon.</p> <p>he Mayoral CIL Charging schedule states that 'The Mayor is having discussions with London boroughs about establishing a common approach to payment by instalments' but provides no definitive timeframe for any adoption of an instalment approach.</p>	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	26.07	Favour Well	Indigo Planning	<p>We also consider that Hammersmith and Fulham should include reference to a discretionary relief in the PDCS as this will be critical to some potential occupiers.</p> <p>Regulation 55 (1) of the 2010 CIL Regulations allows a charging authority to grant relief (for exceptional circumstances) from liability to pay CIL in respect of chargeable development if: (a) it appears there are exceptional circumstances which justify doing so; and b) the charging authority considers it expedient to do so.</p>	Exceptional circumstances	It is not currently proposed to introduce an exceptional circumstances policy. Such a policy is only possible if there is a S106 obligation on a development and the development cannot pay CIL. The proposed CIL charges make allowance for the possibility of such obligations.
PDCS	26.08	Favour Well	Indigo Planning	Finally we note the amendment to the CIL regulations recently laid before Parliament which will establish special rules for calculating CIL liability for planning permissions granted under section 73 of the Town and Country Planning Act 1990 (TCPA) to 'vary' existing planning permissions. We would expect that there be reference made to these amendments in the Draft Charging Schedule.	New CIL Regulations	It is not necessary to refer to S73 provisions in the DCS.
PDCS	27.01	National Grid Property Holdings	Drivers Jonas Deloitte	<p>National Grid Plc owns land at Imperial Road. The entire site measures 6.84 hectares (17.1 acres) and comprises both surplus land owned by National Grid Property Holdings of 3.2 hectares (8 acres) and land owned by National Grid Gas of 3.64 hectares (9.1 acre).</p> <p><u>Summary of Representations</u></p> <p>As part of its strategic review, NGP will consider the potential to redevelop the site along the lines of the vision set out in LBHF's vision for the South Fulham Riverside Regeneration Area (SFR). It will be important to assess all the costs of development, including potential CIL liabilities.</p> <p>In this context, NGP is concerned about the proposed CIL charging rates for the South Charging Zone, in particular the proposed rate of £400 psm for residential uses. While it is not yet in a position to assess the implications of this rate on possible plans for the Imperial Road site, NGP is very concerned about the methodology that has been used for assessing the proposed CIL rates. For the reasons explained below, it considers that some elements of the viability assessment require further work and that it does not properly enable a balanced judgement on the effects of CIL on the economic viability of development across the Borough.</p> <p>NGPs concern is that excessive CIL charging rates could jeopardise regeneration of the area. It therefore proposes that LBHF should initiate a round of detailed discussions involving public and private sector partners in the Borough to ensure that the viability assessment is sufficiently robust to enable a credible judgement to be made about the level of</p>	Meeting	Meeting held

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				CIL rates that should apply in the Borough and the South Charging Zone in particular.		
PDCS	27.02	National Grid Property Holdings	Drivers Jonas Deloitte	... <u>d) Summary</u> ...NGP is concerned that the viability of development and the success of these policies could be jeopardised by CIL rates that have not been properly assessed or justified.	General viability and deliverability	It is considered that the rates are justified. However, further viability work has taken place in preparing the DCS.
PDCS	27.03	National Grid Property Holdings	Drivers Jonas Deloitte	<u>Comments on the PDCS</u> ... NGP considers that LBHF and its consultants have not undertaken a sufficiently thorough assessment the viability of development in the Borough as a whole and South Fulham in particular in order to properly strike the appropriate balance described in the CIL Overview. In particular, NGP questions the approach adopted by LBHF's consultants (Roger Tym & Partners – RTP) in its Viability Assessment, and does not believe that there is sufficient justification for the proposed CIL charging rates. NGP makes the following comments.	General viability and deliverability	It is considered that the rates are justified. However, further viability work has taken place in preparing the DCS.
PDCS	27.04	National Grid Property Holdings	Drivers Jonas Deloitte	<u>a) Simplistic Residual Appraisals</u> NGP is concerned that the CIL charging rates are based on simplistic development appraisals. In essence, the residential rate for the South Charging Zone is based on one appraisal for a scenario involving 50 flats. NGP believes that there has been inadequate consideration of a range of alternative development typologies and assumptions, and questions how a single development appraisal can be treated as representative of development in an area to establish a viable level of CIL. The majority of new homes in the Borough are provided in developments of over 100 units within Opportunity and Regeneration Areas. We therefore suggest that the viability assessment should consider a wider range of projects such as schemes with 100 and 1,000 residential units, and for mixed use developments. NGP is concerned that insufficient analysis has been undertaken to demonstrate that the majority of development in an area would be viable with CIL.	Large sites Mixed uses	The Viability Study has an expanded range of sample sites that includes two large mixed use schemes in each zone (500 and 750 dwellings).
PDCS	27.05	National Grid Property Holdings	Drivers Jonas Deloitte	<u>b) Sensitivity Analysis</u> No sensitivity analysis has been undertaken by RTP. For example no alternative residential sales rates or construction costs have been considered. The PDCS explains at paragraph 2.2.2 that the SFR Development Infrastructure Funding Study (DIFS) forms part of the viability evidence based documents for the PDCS. However, the DIFS assesses development in SFR with quite different sales rates and construction costs to those used by RTP.	Sensitivities: Residential values Construction costs	Whilst sensitivity testing could be undertaken the Hammersmith and Fulham area has witnessed an up-turn in property prices in the last 12 months in the order of 11% - 14% demonstrating a dynamic and buoyant residential market. Given these upwards trends, viability is likely to improve over time.
PDCS	27.06	National Grid Property Holdings	Drivers Jonas Deloitte	If RTP were to use some of the alternative rates from the DIFS in a set of sensitivity appraisals, it would generate very different outcomes to those summarised in the table at paragraph 4.30 of the CIL Viability Assessment. For example RTP has used the sales rate for private units of £9,000 psm. The DIFS states that the apartments with river views achieve in excess of £9,684 psm, whereas apartments without river views achieve values in the region of £6,456 psm (paragraph 6.15). The use of the latter rate in RTP's appraisal would substantially reduce the Net Realisation to the extent that the residual value would be substantially lower than the benchmark land value, making development unviable and unable to pay any level of CIL.	Residential South Zone Riverside values SFR DIFS	The SFR values are now some two years old and prices have increased considerably in the meantime.
PDCS	27.07	National Grid Property Holdings	Drivers Jonas Deloitte	Likewise, the DIFS proposed significantly higher construction costs for private residential units (paragraph 6.33). Should those costs be incorporated into RTP's appraisals, the total costs would increase, again significantly reducing the residual value.	Construction costs (SFR DIFS)	The basis of construction costs is explained in Appendix A of the Viability Study for the DCS.
PDCS	27.08	National Grid Property Holdings	Drivers Jonas Deloitte	A third set of sensitivities that could derive from the DIFS is in relation to the affordable housing assumptions. The table at paragraph 6.23 includes significantly lower sales rates for the various tenures of affordable housing, alongside different construction costs than used by RTP. Using these rates would affect the residual values achieved by RTP, which would affect its judgement on the level of CIL.	Sensitivities: Affordable housing values (SFR)	CIL charges should be based on achieving the affordable housing target of the Development Plan.

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
					DIFS)	
PDCS	27.09	National Grid Property Holdings	Drivers Jonas Deloitte	<p><u>c) Benchmark Land Value</u></p> <p>NGP requests that further information is provided by RTP about the source of its benchmark land value of £20 million per hectare in the South Charging Zone. While a list of sources is included in Appendix 2 of the Viability Assessment, the actual evidence of the benchmark values is not included.</p>	Land values	<p>The approach to benchmark land values is explained in Appendix A of the Viability Study.</p> <p>The figure for the south zone has been revised to £23M/hectare.</p>
PDCS	27.10	National Grid Property Holdings	Drivers Jonas Deloitte	<p><u>d) Setting the CIL Rate</u></p> <p>NGP is particularly concerned about the process for assessing the level of CIL rates. The Viability Assessment does not appear to have made any objective assessment, and is purely based on a judgement made by RTP about the proportion of the “overage” that might be captured through CIL. NGP is concerned that RTP’s approach is too simplistic for such an important assessment and considers that there should be more justification for the final proposed rates.</p>	CIL as proportion of overage	It is not clear what is being suggested by the need for an objective assessment unless this means a percentage based approach.
PDCS	27.11	National Grid Property Holdings	Drivers Jonas Deloitte	<p><u>e) Other Issues</u></p> <p>NGP raises the following issues in relation to the PDCS:</p> <ul style="list-style-type: none"> NGP is very concerned that inadequate consideration has been given to the abnormal costs that could exist for developments in the Borough. It considers that RTP should address the potential for significant abnormal costs such as those associated with the Imperial Road, including removal of the gasholders, remediation of contaminated land and the potential provision of a link road and open space. The assessment of these issues should be included in the sensitivity analysis described above. However, NGP acknowledges that the PDCS does at least recognise that the level of affordable housing may need to be reduced to reflect abnormal costs. 	Abnormals	Abnormal costs will clearly vary from site to site and it is not feasible to assess these for CIL viability appraisals. The Viability Study methodology expects that abnormal costs would be reflected in the land costs, therefore, they would effectively reduce the Benchmark Land Value. However, the Viability Study methodology allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the overage, since only a small proportion is taken for CIL. As the commenter notes, if the extent of abnormals was so great as to not to be properly reflected in land price and to lead to site development being unviable policy allows for the affordable housing proportion to be reduced.
PDCS	27.12	National Grid Property Holdings	Drivers Jonas Deloitte	<ul style="list-style-type: none"> NGP does not accept that the analysis summarised in paragraph 4.3.2 of the PDCS justifies the levels of charging rates proposed. NGP considers that the vague reference to the proportion of CIL rates to other factors is unhelpful in the context of the issues being addressed. 	CIL as proportion of other factors	Considering CIL as a proportion of other factors is helpful when assessing the impact.
PDCS	27.13	National Grid Property Holdings	Drivers Jonas Deloitte	<ul style="list-style-type: none"> NGP proposes that, prior to the publication of the Draft Charging Schedule, LBHF should prepare (as part of the next stage of work) an Instalments Policy for the payment of CIL. This is particularly important for the large scale schemes that exist in the Borough such as the Imperial Road site in the SFR area. The imposition of CIL has the potential to create very substantial CIL liabilities which could prevent development from taking place. The ability to phase CIL payments will be an essential component of ensuring that successful developments can be delivered. 	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London’s CIL instalment policy will apply to Mayoral and borough CIL payments.
PDCS	27.14	National Grid Property Holdings	Drivers Jonas Deloitte	<ul style="list-style-type: none"> NGP believes that LBHF has undertaken a thorough review of infrastructure requirements for the Borough. It has reviewed the Draft Infrastructure Plan (September 2012) with specific reference to the Imperial Road site. Notwithstanding NGP’s previous opposition to the SPD in this regard, it questions why the proposed open space provision for the Imperial Road site is not included in the Infrastructure Planning Schedule. 	Imperial Road open space infrastructure	Acknowledge Imperial Road open space infrastructure in IPS.
PDCS	27.15	National Grid Property Holdings	Drivers Jonas Deloitte	<p><u>Conclusions</u></p> <p>While it is at the very start of its assessment of the future possibilities for the Imperial Road site, NGP is very concerned that LBHF does not propose and adopt CIL charging rates that could jeopardise the firm strategic</p>	General viability and deliverability	It is considered that the rates are justified. However, further viability work has taken place in preparing the DCS.

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				<p>objectives for achieve growth in the Borough and the SFR area.</p> <p>NGP considers that the PDCS is currently based on a Viability Assessment that does not robustly assess the viability of development in the Borough and the South Charging Zone, and could therefore result in unviable CIL rates. NGP does not believe that LBHF has properly struck an appropriate balance between funding infrastructure and the economic viability of development.</p>		
PDCS	27.16	National Grid Property Holdings	Drivers Jonas Deloitte	For the reasons described in this letter, NGP proposes that LBHF should establish a Steering Group of public and private sector partners with an interest in development in the Borough in order to ensure that more through Viability Assessment is undertaken, and that acceptable CIL charging rates can be proposed. NGP would be very please to take part in that group or any other forum that the Council considers could be of value to this process. Without this approach, NGP is very concerned that the successful achievement of National and Local Planning Policies that are aimed at achieving economic growth and housing development will be jeopardised.	Meeting	Meeting held
Pre-DCS1	13.01	Berkeley Group	Quod	<p>We agree that the development types (500 and 750 homes with mixed use) are broadly representative of the types of larger development which are brought forward in the Southern Zones of the Borough. The assumed site sizes however seem relatively small. As far as we are aware the three applications that have been consented of this scale in the last 18 months have been from 2.9 to 4 hectares in size.</p> <p>In addition they have all contained significant levels of non-residential floorspace, so we do not think that either of the 'single-use' residential typologies is relevant to likely development in the area. Strategic Policy SFR of the Core Strategy includes requirements for employment uses on sites within the most accessible locations as well as retail and other activities for day to day uses. The adopted SPD (2013) promotes a 'rich variety of land uses across the area'.</p> <p>We would therefore suggest that limited weight should be placed on the residential only typologies.</p>	Typologies	The large mixed use schemes test different densities of development which can be used to be reasonably representative of potential sites of varying site areas on a pro-rata basis.
Pre-DCS1	13.02	Berkeley Group	Quod	We have not been presented with the sources or justification for the assumptions used in the updated (or indeed the original) viability studies.	Sources/justification of assumptions	<p>A range of sources have been used to inform the assumptions. BLV's are informed by Land Registry Data which records recent transactions, supplemented with consultations with local property agents and developers.</p> <p>Residential sales values have been informed by Land Registry data gathered for each zone and new build developments which have recently come forward combined with quoted prices of properties currently on the market. This information has been supplemented via discussions with house builder sales representatives.</p>
Pre-DCS1	13.03	Berkeley Group	Quod	Residential values vary quite significantly across the area depending, particularly, on proximity to and views of the river. The blended rate appears to be closer to the higher end of the assumptions in the South Fulham Riverside DIF Study (DIFS)	Residential values	Since the preparation of the draft CIL Charging schedule the Hammersmith and Fulham area has witnessed value increases. Anticipated sales values have subsequently been revised to reflect those increases. Evidence of new values within Fulham demonstrably show that the blended values applied are relatively conservative when compared with what is currently being quoted with respect to recent river front development.
Pre-DCS1	13.04	Berkeley Group	Quod	The build costs – even taking into account infrastructure and contingency - are low. We would expect them to be materially higher to achieve the targeted higher end residential values. As a minimum the impact of higher build costs	Build Costs - Residential	Residential build costs are based upon industry data from the Build Cost

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Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				should be tested: we would suggest a 30% increase for these purposes. We therefore do not agree that these costs should be considered as notionally including some allowance for Section 106 contributions	costs	Information Service (BCIS) which is produced by the Royal Institution of Chartered Surveyors (RICS). The build costs used are derived from recent data of actual prices in the marketplace. For flats upper quartile rates for 6+ storey development have been used. For houses, upper quartile rates have been used. Depending on actual scheme specification costs could greatly vary from the BCIS data. However, the costs are based on a 'typical residential development' in the area with no specific consideration of scheme features which may result in a 'premium' product and could follow through into enhanced sale values
Pre-DCS1	13.05	Berkeley Group	Quod	Marketing and sales agents' costs are very low at 1.2%. We would normally expect robust assumptions to be in the order of between 3.5 and 4%. Sales legal costs are also low at 0.12%; we would expect 0.3%.	Marketing costs	Marketing costs are included within the revised financial model at £1,000 per private residential unit which is a recognised industry standard. The sales agents fees are now 1.25% of GDV and the sales legal costs are now increased to 1.25%.
Pre-DCS1	13.06	Berkeley Group	Quod	<p>As a result of our comments on build costs above we do not believe that Section 106 or Section 278 costs have been taken into account in these assessments. As stated at the meeting we also do not agree that it is adequate to take a 'residual valuation' approach to determining Section 106 requirements – i.e. suggesting that there is a 'buffer' in the valuations from which Section 106 can be drawn.</p> <p>This is because both the NPPF and the CIL Regulations suggest that Section 106 and other planning obligations must be limited to the minimum that is necessary to ensure that the impacts of development are acceptable. Given that the Council has a very detailed understanding of the infrastructure required in the South Fulham Area through the DIFS it should be possible for you to come to an informed judgement about likely obligations for the development typologies and include them in the assessment.</p> <p>The suggested approach of relying on a buffer in the residual land values must cast significant doubt on your ability to demonstrate that you are not proposing CIL rates at the margins of viability as you are required to do in paragraph 30 of the CIL guidance.</p>	S106 costs – anticipated	<p>It is anticipated that after the introduction of CIL additional funding for a number of items of infrastructure identified in the South Fulham DIFS will be from CIL receipts. However, it is also expected that some other items will be the subject of site specific S106 obligations, in particular, where the items are not infrastructure as defined for CIL purposes.</p> <p>The approach to identifying an overage (residual land value minus benchmark land value) is considered to be an appropriate way of assessing the viability of sample schemes and ability to pay CIL. The amount of CIL is a small proportion of the overage so that there is scope for S106 obligations to also be met from overage without affecting scheme viability (and while still leaving headroom).</p>
Pre-DCS1	13.07	Berkeley Group	Quod	<p>The assumptions on duration of development and sales rates are not set out in the documentation we have seen, but your explanation at the meeting suggested that they were not at all in line with the Berkeley Group's extensive experience of building out such developments. This could have a very significant impact on the appraisal outcomes and we would suggest that it is essential for your consultants to re-run the assessments using more realistic assumptions.</p> <p>We would suggest that they might consider the following sensitivities for private dwellings:</p> <ul style="list-style-type: none"> • Planning: – both scenarios – 12 to 18 months 	Phasing Sales/void rates	<p>The sales rates are informed by recent sales rates evidenced within the area including Fulham Reach and Circus West, Battersea, combined with others. Viability studies including the White City DIF and Earls Court Viability Review have also informed these estimates.</p> <p>Proposed sales rates of 6-8 per month</p>

Stage	Rep #	Organisation	Agency	Representation	Issue	Response																												
				<ul style="list-style-type: none"> • Site Preparation: – up to 6 months • Main Construction: (100 homes p/a) <ul style="list-style-type: none"> ○ 5 years – 500 home/10,000 sqm mixed use scenario ○ 7.5 Years – 750 homes/15,000 sqm mixed use scenario • Sales: <ul style="list-style-type: none"> ○ 6 to 8 per month from consent (ensuring differentiation between pre-sales commencing and occupation, as it is only at occupation that sales receipts - including deposits - should be reasonably taken into consideration in the viability) <p>We would be interested to receive copies of such sensitivities. Our view is that they will demonstrate that the residual values being generated by the current appraisals are too high and consequently that the proposed CIL levels are also too high.</p>		appear conservative in the light of this evidence.																												
Pre-DCS1	13.08	Berkeley Group	Quod	<p>We believe such an approach would confirm what we set out in our original response to the PDCS – namely that for larger sites the proposed CIL rates would result in charges significantly above the levels achieved on recent major planning applications through Section 106 agreements.</p> <p>The table below shows the achieved Section 106 obligations and affordable housing achieved on the three sites which meet the large sites typology, and the implied CIL contribution using the current PDCS. This assumes that all existing floorspace meets the qualifying test in regulation 40 (6 months of 12 months occupation prior to permission allowing development), which in practice we think is unlikely. Section 106 figures are based on the Molior database. Current floorspace assumptions for Fulham Riverside use estimates based on publically available information.</p> <p>The implied CIL rate compared to the previous Section 106 assumptions shows an increase of obligations of between 40% and 120%, and this assumes no residual Section 106, which is unlikely on the basis of the infrastructure evidence base that you have produced.</p> <table border="1"> <thead> <tr> <th>Development</th> <th>Homes</th> <th>S106 Contribution</th> <th>Affordable Housing (%)</th> <th>CIL – Mayor (Assuming Discount)</th> <th>CIL LBHF (Assuming Discount)</th> <th>CIL Mayor + LBHF</th> </tr> </thead> <tbody> <tr> <td>Chelsea Creek</td> <td>489</td> <td>£14,895,000</td> <td>30%</td> <td>£3,581,350</td> <td>£18,909,131</td> <td>£22,490,481</td> </tr> <tr> <td>Fulham Reach</td> <td>744</td> <td>£11,966,524</td> <td>25%</td> <td>£3,880,000</td> <td>£22,448,400</td> <td>£26,328,400</td> </tr> <tr> <td>Fulham Riverside (Sainsbury/L+Q)</td> <td>463</td> <td>£10,505,850</td> <td>14%</td> <td>£1,946,350</td> <td>£12,624,981</td> <td>£14,571,331</td> </tr> </tbody> </table> <p>...</p> <p>Given that Hammersmith and Fulham has typically been achieving close to the top of the range of Section 106 contributions in London we would suggest that scope for extracting greater obligations from large scale developments in the Borough is limited.</p>	Development	Homes	S106 Contribution	Affordable Housing (%)	CIL – Mayor (Assuming Discount)	CIL LBHF (Assuming Discount)	CIL Mayor + LBHF	Chelsea Creek	489	£14,895,000	30%	£3,581,350	£18,909,131	£22,490,481	Fulham Reach	744	£11,966,524	25%	£3,880,000	£22,448,400	£26,328,400	Fulham Riverside (Sainsbury/L+Q)	463	£10,505,850	14%	£1,946,350	£12,624,981	£14,571,331	S106 costs	The DCS residential charge for the south zone, where the listed sites are located is to remain at £400/m ² . Therefore, assuming the calculations in the table are correct the theoretical LBHF CIL would be substantially less than the figures shown. It is not clear whether existing floorspace has been taken into account where appropriate.
Development	Homes	S106 Contribution	Affordable Housing (%)	CIL – Mayor (Assuming Discount)	CIL LBHF (Assuming Discount)	CIL Mayor + LBHF																												
Chelsea Creek	489	£14,895,000	30%	£3,581,350	£18,909,131	£22,490,481																												
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Pre-DCS1	13.09	Berkeley Group	Quod	We would therefore suggest that the Council seriously consider reducing its proposed CIL charging rates, consistent with the guidance in the NPPF and CIL Guidance, to ensure that development is viable, and also to achieve the Borough's stated objective of bringing forward development.	CIL charge	No change proposed.																												
Pre-DCS1	13.10	Berkeley Group	Quod	In line with paragraph 27 of the CIL Charging Guidance the Berkeley Group would like to continue to be engaged in discussion on these issues prior to the production of the Draft Charging Schedule, both in one to one meetings and with other developers and landowners.	Meeting	Meeting was held after PDCS																												
Pre-DCS1	25.01	Capital and Counties	DP9	By way of overview, Capco is concerned that the main points set out in its representations have not been addressed. Whilst we recognise that CIL setting is complex, Capco considers that the basic approach to the viability assessment in testing hypothetical development typologies is inappropriate and does not enable LBHF to understand the nature of risk related to the deliverability of the Development Plan (in other words it does not, in Capco's opinion, enable LBHF to weigh-up the desirability of funding infrastructure from CIL against the potential effects on the economic viability of development in accordance with Regulation 14). By way of example, the hypothetical typologies do not model the substantial development costs associated with the comprehensive regeneration of the ECWKO, particularly relating	General viability (ECWKO)	The DCS proposes a differential rate for ECWKO based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.																												

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				to estate regeneration.		
Pre-DCS1	25.02	Capital and Counties	DP9	In accordance with the Government's Guidance, the approach to viability needs to change and focus on actual strategic sites, including the ECWKO. LBHF and Roger Tym and Partners must, through close collaboration with relevant developers, ensure viability assessment inputs/assumptions are the most appropriate and based upon an understanding of the particular complexities of strategic sites, such as: development programme and phasing; upfront infrastructure costs; necessary on-site 'in kind' infrastructure; expected residual Section 106 costs; and known abnormal costs – ranging from factors such as site remediation to estate regeneration. The evidence must not be too 'high level'. It ought to be more thorough and detailed than the produced to date and move towards testing actual development as opposed to hypothetical typologies. The evidence needs to be prepared now and the development industry provided the opportunity to comment prior to the publication of the Draft Charging Schedule, particularly owing to the limited flexibility in revising a Draft Charging Schedule after it has been published (see paragraph 52 of Government Guidance).	Strategic sites (ECWKO)	The DCS proposes a differential rate for ECWKO (£0/m ²) based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
Pre-DCS1	25.03	Capital and Counties	DP9	Essentially, Capco do not feel as though the new development typologies suitably address their concerns. The key points made in the October 2012 representations remain and, in particular, Capco consider that a differential rate for the ECWKO is the only robust evidence-based approach and that applying the same rate to ECWKO as to non-strategic sites cannot be justified. As previously stated, Capco – and its advisors – are committed to working closely with LBHF on the CIL implications in respect of the ECWKO in order to ensure the viability and deliverability of the Development Plan is not put at risk.	Differential rates (ECWKO)	The DCS proposes a differential rate for ECWKO of £0 based on a viability assessment of the whole area and taking account of S106 costs.
Pre-DCS1	25.04	Capital and Counties	DP9	As a final point, it is now important to draw attention to the fact that the Royal Borough of Kensington & Chelsea (RBKC) has now published its PDCS. This includes charging rates for the part of the ECWKO that falls within RBKC. The ECWKO is central to the deliverability of both LBHF and RBKC Core Strategies. The ability for comprehensive development to be realised across the whole of the ECWKO needs to be safeguarded and must be a primary concern of both authorities in setting their respective CILs. Capco has recently submitted representations in relation to the RBKC PDCS, setting out its concerns with the way in which the PDCS has been derived and its potential implications for ECWKO. The concerns are broadly similar to those set out in the representations in respect of the LBHF PDCS. It is essential that both boroughs work together in this respect. It cannot be the case that the viability assessment of ECWKO is artificially separated or divided simply because of administrative boundaries. Capco urge LBHF and RBKC to work together and ensure any assessment of viability associated with ECWKO is consistent and approached as a whole.	Cross-boundary viability implications with RBKC (ECWKO)	Both RBKC and LBHF have based their CIL appraisals on the whole SPD area across both boroughs. Both Councils have come to the conclusion that the area should be a separate charging zone with a £0 CIL rate.
Pre-DCS1	25.05	Capital and Counties	DP9	We would like to discuss the content of this letter with you and request a working meeting with you in order to scope out the assessment/evidence for ECWKO specifically.	Meeting	Meeting was held after PDCS
Pre-DCS1	25.06	Capital and Counties	DP9/Quod	...the work fails to reflect the complexity of development viability, which underlies the delivery of strategic sites such as Earls Court. This in turn prejudices the opportunity for due consideration of the Earls Court West Kensington Opportunity Area (ECWKO) as a separate charging zone, enabling the ECWKO to benefit from a differential CIL rate to the rest of the Borough and ensure the risk of CIL undermining its delivery is mitigated.	Differential rates (ECWKO)	The DCS proposes a differential rate for ECWKO based on a viability assessment of the whole area which takes into account costs assessed by DVS for the SPD appraisal.
Pre-DCS1	25.07	Capital and Counties	DP9/Quod	<u>1. Development typologies:</u> The structure used to appraise the larger development projects and mixed use schemes, still fails to appropriately reflect how a strategic site would come forward for development. The revised Government CIL guidance issued in December 2012 sets out the requirement for a charging authority 'to sample directly an appropriate range of types of sites across its area.... The focus should be in particular on strategic sites on which the relevant Plan relies and those sites (such as brownfield sites) where the impact of the levy on economic viability is likely to be most significant.' Whilst specific appraisals have been produced for the Earls Court area, these do not accurately reflect the scale, nature, costs and complexity of the regeneration to come forward in the ECWKO – which includes estate regeneration.	Strategic sites Typologies (ECWKO)	The DCS proposes a differential rate for ECWKO of £0 based on a viability assessment of the whole area and taking account of S106 costs.
Pre-DCS1	25.08	Capital and Counties	DP9/Quod	<u>2. Scale of development and estate regeneration:</u> The revised viability work introduces 500 and 750 unit scenarios along with an element of commercial floorspace. However, in view of the scale of development envisaged in the ECWKO, as well as the complexity associated with land assembly, demolition, site preparation, up-front infrastructure, whilst also unlocking potential for and delivery of estate regeneration, the assumption that the viability of a strategic site is represented in a single 500 unit or 750 unit 'phase' is misleading and distorts the results of the Viability Study. It is incorrect to simply pro-rata all costs and revenue as strategic sites require significant and	Strategic sites Typologies (ECWKO)	The DCS viability study uses one appraisal for ECWK based on development of the whole SPD area.

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				disproportionate up-front investment to release the land, prepare the site, undertake appropriate ground works and deliver necessary infrastructure before development can even begin. There is then often an extended period during which confidence in the regeneration process and the wider benefits that it can deliver begin to be realised. The approach taken does not reflect this inherent complexity, which is further compounded at Earls Court by the delivery of estate regeneration. These factors are not reflected appropriately in the use of discreet 500 and 750 unit development scenarios meaning costs are under stated whilst values are overstated which in turn distorts the outcomes of the Viability Study which is intended to inform the CIL rate.		
Pre-DCS1	25.09	Capital and Counties	DP9/Quod	3. Evidence Base: Previously, as an example of the failure to pay due regard to available evidence, we highlighted the failure to cross-refer to the DVS DIF Study– additional commentary on this is provided below. The December 2012 Guidance reiterates the importance of a robust evidence base and confirms that ‘the charging authority should also prepare and provide information about the amounts raised in recent years through section 106 agreements. This should include the extent to which affordable housing and other targets have been met.’ No evidence has been provided by the Council identifying the amounts raised through s106 agreements previously nor is there any reference to actual affordable housing delivery. This information should be made available.	Recent/historic S106s Recent/historic affordable housing delivery	The Viability Study includes an appraisal for the ECWK SPD which is referenced to the DVS report on the SPD.
Pre-DCS1	25.10	Capital and Counties	DP9/Quod	4. Inputs and Assumptions: The revised work includes revisions to the base RTP assumptions and sensitivities have been tested having regard to the DVS DIFS work. However, this is not undertaken in a transparent way – it is not possible to easily reconcile what inputs have been amended and which have not – a summary reconciliation of the base assumptions and the changes made including those which have been omitted is required. From the limited information available it is evident that: (a) There is an inconsistent selection of inputs and assumptions, which have been applied i.e. higher sales values have been included, yet many of the additional costs set out in the DVS DIF study are excluded – clarification on this is essential.	Residential values (ECWKO) Residential costs (ECWKO)	The appraisals have been remodelled using a bespoke excel model which includes revised assumptions which reflect the dynamic changes within the market place over the last 12 month period and reflect the additional costs identified within the DVS DIF Study. The revised assumptions are set out within the latest report in conjunction with the outputs from the recent modelling exercise.
Pre-DCS1	25.11	Capital and Counties	DP9/Quod	(b) There is a failure to test the development typologies and capacity scenarios set out in the DVS DIF Study and as illustrated as masterplan solutions in the ECWKO SPD i.e. mixed use scenarios of 4,000, 6,000 and 8,000 units. Furthermore, the revised viability work has failed to undertake cash flow models to test the impact of CIL on these three development capacities – this is a deficiency of the typologies as set out above.	Strategic sites Typologies (ECWKO) Cash flow (ECWKO)	In recognition of this a bespoke financial model has subsequently been prepared for the whole 32.6ha site with respect to the 8,000 dwelling scenario to ascertain the likely level of CIL which the scheme might support.
Pre-DCS1	25.12	Capital and Counties	DP9/Quod	(c) The exceptional costs arising from the regeneration of the West Kensington and Gibbs Green housing estates identified within the ECWKO are omitted which we have identified in our previous representations to be c. £163,000,000 million. These costs are implicit in releasing the ECWKO for regeneration.	Estate regeneration (ECWKO)	The costs of replacement estate housing have been included within the revised appraisal model for ECWKO.
Pre-DCS1	25.13	Capital and Counties	DP9/Quod	5. As set out above, the revised viability work has tested viability, specifically for the ECWKO, based on the previous work carried out by RTP in August 2012 using updated assumptions (which we refer to as ‘Sensitivity 1’) and has tested viability based on some of the assumptions in the DVS DIF Study (which we refer to as ‘Sensitivity 2’). In relation to the inputs and assumptions used for both sensitivities, the revised viability work should be amended, as set out below: (a) Residential Sales Values and sales rate: In Sensitivity 1, without any explanation, the private sales value assumptions have increased by £1,400 per m2 to £7,800 per m2. However, despite this increase, the associated costs in achieving a higher sales rate per m2 have not been acknowledged. There is no differentiation of the required enhancements in specification (i.e. where a higher sales value is assumed, unavoidably a higher fit-out cost is required to meet the expectations of private purchasers), the increased on-site facilities demanded of purchasers (i.e. gyms, concierge, valet parking, superior communal spaces, etc.) and the increased marketing budget necessary to attract purchasers, pre-sales targets and the budget required for place-making and branding of schemes.	Residential values (ECWKO) Residential costs (ECWKO) Marketing (ECWKO)	Residential build costs are based on the DVS report in the appraisal for the DCS.
Pre-DCS1	25.14	Capital and Counties	DP9/Quod	(b) Affordable Housing Transfer Values: In Sensitivity 1, there is no reconciliation between affordable housing values and the affordable housing products assumed, their affordability and local housing allowance rates. Consequently, the affordable housing transfer values of £2,600/ m2 for intermediate housing and £2,400/m2 for affordable rent risks	Affordable housing transfer	Affordable Housing Transfer Rates were informed by housebuilders and S106 Agreements and informed by the local

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				being over stated.	values (ECWKO)	authority. Lower affordable housing transfer rates have been assumed within the alternative Earls Court financial models in accordance with the DVS viability study.
Pre-DCS1	25.15	Capital and Counties	DP9/Quod	(c) <u>Unrealistic Development programme</u> : Officers have confirmed that a build period of 18 months and sales period of 9 months has been assumed i.e. 27 months from start on site through to the sale of the last home. This reflects a very modest construction period and very aggressive sales rate assumptions. This fails to capture the complexity of works required, the scale of upfront infrastructure and time needed to deliver the infrastructure before sub-structure works and other development can commence. Consequently, the programme is over-optimistic and underestimates the significant project financing costs, development risk and required developer return. Strategic sites require onerous, time consuming lead-in and pre-commencement periods to conclude the legal agreements for stopping up orders, carry out detailed site investigations, factor in the time and costs required to undertake any necessary CPO processes, the decant, home loss and disturbance costs for residents and associated costs of gaining vacant possession, to discharge complex pre-commencement planning conditions, agree neighbourly agreements and seek the necessary approvals from third parties and other statutory authorities, etc. all of which have not been accounted for. The sales rate and sale period assumptions (a sales rate of between 222-333 units per year was assumed, which equates to an absorption rate of 18- 28 units per month), will result in the appraisals failing to account for the impact longer protracted sales periods have on development cash flow. There is no evidence to show that such rates have been achieved on large schemes across the Borough previously.	Sales/void rates (ECWKO)	The phasing for the ECWK appraisal has been reviewed.
Pre-DCS1	25.16	Capital and Counties	DP9/Quod	(d) <u>Insufficient cost assumptions</u> : In both sensitivities, a nominal build cost rate has been assumed, when compared with the sales values assumed. By way of comparison, in the Viability Study carried out by BNPP which informs the maximum and suggested charging rates in RBKC (of which a proportion of the units in the ECWKO are proposed), the residential build cost assumptions are 22% higher than the build costs assumed in this revised viability work. The nature and type of development in the ECWKO will be large scale, mixed use and multi-phased, requiring significant up-front, onsite infrastructure costs, as identified in the ECWKO SPD. Both scenarios have underestimated these costs (by almost 50%) and excluded the associated fees and contingency required. A combination of the complexity and scale of strategic schemes, such as Earls Court, means that there are a plethora of cost risk items outside of the 'normal' cost allowances for small discreet projects, for example insurances, rights of lights, party wall costs, surveys, events, etc. In addition, the nature of the scheme being delivered requires a comprehensive approach to be taken to estate services, which often results in a shortfall for the initial years of a development. Furthermore, and fundamentally, neither sensitivity has included the costs associated with delivering estate regeneration.	Residential costs (ECWKO) Fees and contingency (ECWKO) Estate regeneration (ECWKO)	The complexity of the Earls Court site is acknowledged and the revised viability model includes costs related to infrastructure and abnormals and other plot related costs informed by the DVS study. RBKC had also used the DVS study as a basis of its CIL appraisal for ECWK.
Pre-DCS1	25.17	Capital and Counties	DP9/Quod	(e) <u>Mayoral CIL</u> : The charging area assumptions for both Mayoral CIL and borough CIL are incorrect as the communal affordable housing space has not also been included. Regulation 49 defines the qualifying dwellings as being eligible for relief from CIL liability and as Regulation 50 calculates the amount of social housing relief based on gross internal area, the communal areas are chargeable area. Until the regulations change, this area should be included, when determining the CIL liability. The information available does not provide details of the payment structure assumed for the Mayoral CIL and so it is unclear if the timing of the payment of Mayoral CIL adheres with the Mayor's instalments policy, as set out in the 'Draft SPG: Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy' (November 2012), which requires CIL to be paid in full 60 days after commencement of the development if the total payable CIL is £500,000 or less or if it's more, half to be paid 60 days after commencements with the remaining 50% paid 240 days after commencement.	Mayoral CIL on communal social housing floorspace	In the viability appraisals, the private residential and affordable floorspace GIA is based on the same average floorspace per dwelling. The GIA would include communal floorspace. Therefore, communal floorspace is split proportionally which is in accordance with the current CIL Regulations. The timing of the Mayoral CIL is assumed at commencement of construction, therefore 'worst case'.
Pre-DCS1	25.18	Capital and Counties	DP9/Quod	(f) <u>Profit</u> : As schemes get larger and more complex in nature, developers may use other indicators, such as the Internal Rate of Return, to measure the profitability and viability of a development, such as those schemes situated within the ECWKO. Therefore, a blanket approach to developer return for all typologies is not considered to accurately reflect the additional risk facing strategic sites.	Profit/IRR (ECWKO)	Whilst it is recognised that this alternative method is often adopted for measure profitability and particularly, for comparing the profitability of different investments, this approach has not been adopted. The appraisals assume a target developer return of 20% on total development costs

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						which may vary, depending upon developer attitude towards risk.
Pre-DCS1	25.19	Capital and Counties	DP9/Quod	(g) <u>Residual Section 106/ Section 278 contributions</u> : It is understood that residual s106 costs have rolled into the allowance made for 'SUDS,' which is assumed to be 5% of build costs. No evidence is presented on the level of Section 106 contributions previously secured or clarification of what residual Section 106 the Council will be seeking over and above CIL, which are anticipated to be significant for sites such as Earls Court- Capco is in the process of negotiating a Section 106 Agreement with LBHF (and other relevant parties) in relation to the current Earls Court Main Site planning application (reference: 2011/02001/OUT). The Heads of Terms associated with this agreement were set out in the LBHF's officer report to committee, dated 12th September 2012 and include a combination of substantial in-kind works and financial contributions totalling circa. £93m (excluding affordable housing and estate regeneration). Therefore, it is self-evident that Section 106 costs should not be rolled into a generic +5% cost, instead it should be considered as a standalone cost and evidenced.	S106s costs – anticipated (ECWKOA)	S106 costs have been taken into account and the DCS proposes a £0 CIL charge in ECWK.
Pre-DCS1	25.20	Capital and Counties	DP9/Quod	(h) <u>Land acquisition legal fees</u> : Whilst 1% has been assumed for land sales agent fees, the revised viability work does not apply legal costs as a % of the land value (which in the 2011 DVS Report were assumed to be 0.75%) but rather as a fixed cost of £25,000 for all development typologies, which is wholly unrealistic.	Land sales legal costs (ECWKOA)	Applying a percentage rate will not reflect the costs which will be incurred in practice. The legal fees associated with site acquisition will likely be broadly the same with respect to the site sizes tested for each scenario.
Pre-DCS1	25.21	Capital and Counties	DP9/Quod	If the above matters are addressed the viability results conclude that larger sites become less viable than smaller sites, particularly sites that require comprehensive estate regeneration and consequently, there remains a failure to apply a reasonable viability buffer in the proposed CIL charging rates, to ensure that development at the margins of viability is not unduly prejudiced. As the DVS DIF Study concluded in November 2011, development viability in the ECWKOA is already marginal and when assuming the likely costs associated with the development within the ECWKOA, the application of a more realistic programme, and cash flow assumptions and the imposition of a local CIL charge at the proposed rates set out in the Preliminary Draft Charging Schedule, development is unviable. In view of the exceptional additional costs also incurred as a consequence of estate regeneration and the uncertainty surrounding residual s106 costs and their scale, the risk CIL presents to development viability is not resolved through the flexibility provided for in the application of affordable housing policy. Therefore, our concerns remain- the revised viability work is not fit for purpose and we urge the Council to readdress the impact of CIL on development viability on developments within the ECWKOA in the context of the revised Regulations issued in December 2012 and the identified deficiencies in the work carried out to date.	General viability (ECWKOA)	The DCS proposes a differential rate of £0/m ² for ECWKOA based on a viability assessment of the whole area which takes into account values and costs assessed by DVS for the SPD appraisal.
Pre-DCS1	27.01	National Grid Property Holdings	Deloitte	While it is helpful to receive additional appraisals to cover larger schemes of 500 and 750 dwellings, these typologies do not address the need for greater levels of sensitivity analysis to be undertaken. Nor do they adequately assess the economic viability of the types of strategic sites that the Hammersmith & Fulham Core Strategy relies upon for the majority of its housing delivery.	Typologies Strategic sites Sensitivities	The two large site appraisals test different densities and provide a reasonable representation of possible densities on strategic sites.
Pre-DCS1	27.02	National Grid Property Holdings	Deloitte	Furthermore we still require information that was requested in our letter such as the evidence of benchmark values.	Source of BLVs	Please see Appendix A of the Viability Study accompanying the DCS
Pre-DCS1	27.03	National Grid Property Holdings	Deloitte	For the reasons that are set out below, the updated viability assessment work does not change NGP's previous comments that the proposed level of CIL could jeopardise the regeneration of large sites in the borough and hence threaten the objectives of the Development Plan to address the overriding need for new homes in the borough.	General viability	See more specific comments.
Pre-DCS1	27.04	National Grid Property	Deloitte	<u>1. Sensitivities</u> For reasons that are set out in NGP's first letter and as discussed last week, we consider that more detailed sensitivity analysis should be undertaken to justify the proposed level of CIL rates. The current absence of sensitivity analysis is	Sensitivities	Whilst sensitivity testing can be undertaken the Hammersmith and Fulham area has witnessed an up-turn in property prices in

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		Holdings		contrary to the acknowledged difficulties in assessing viability. Roger Tym & Partners' Viability Assessment includes a series of caveats about the difficulties associated with viability work, for example at paragraphs 4.3, 4.24 and 4.31. In these circumstances, it is essential that more detailed sensitivity analysis is undertaken. Furthermore you explained last week that the council intends to test the 'worst case', which has not yet been done.		the last 12 months in the order of 11% - 14% demonstrating a dynamic and buoyant residential market. Given these upwards trends, viability is likely to improve over time.
Pre-DCS1	27.05	National Grid Property Holdings	Deloitte	We set out in our previous letter how the viability assessment should consider the range of residential sales rates and construction costs that are set out within the South Fulham Riverside DIFS. The new appraisals adopt the same values and costs as used in the original 50 unit appraisal for the southern area, and therefore do not include the necessary level of sensitivity. Indeed, none of the appraisals use the lower level of sales rates that are included at paragraph 6.15 of the DIFS, nor the higher level of construction costs set out at paragraph 6.33 of the DIFS. The result of including these rates would significantly affect the viability of the tested schemes and hence the overage assessment.	Residential values (SFR DIFS) Residential costs (SFR DIFS)	Residential build costs are based upon industry data from the Build Cost Information Service (BCIS) which is produced by the Royal Institution of Chartered Surveyors (RICS). BCIS offers a range of prices dependent on the final specification. For flats upper quartile rates for 6+ storey development have been used. For houses: also used upper quartile rates. An allowance has been made over and above these costs to reflect higher specification of developments whilst remaining cognisant of the assumed sales values, which are not at the higher end in terms of values anticipated or specification based on more recent evidence of sales values within the market.
Pre-DCS1	27.06	National Grid Property Holdings	Deloitte	In this context, it is worth noting that the new appraisals for 500 and 750 unit schemes assume that the developments are constructed at the higher end of the density ranges that are assumed by RTP at paragraph 3.6. One immediate consequence of this approach is that the construction costs are likely to increase with higher density development due to the potential for development above six storeys and the possible inclusion of basements. This provides further justification for a sensitivity analysis that uses the higher level of costs assumed within the DIFS.	Residential costs / density (SFR DIFS)	The residential build costs are informed by the latest published BCIS data published by the RICS assuming 6+ storey developments with an additional margin.
Pre-DCS1	27.07	National Grid Property Holdings	Deloitte	<u>2. Overage</u> We have previously commented on the simplistic nature of the overage assessment within the viability assessment and its use in proposing CIL rates. It is important that further explanation is provided about how the judgements have been made in terms of capturing part of the overage for CIL, including a bottom up approach to dividing the amount of overage.	CIL as proportion of overage	The overage per sq m of total development is the surplus on the appraisal, being the difference between residual land value and the benchmark land value. The ability of the development to pay CIL at any particular level is assessed against the overage allowing for the possibility that the overage may also be required (in a particular case) to fund S106 contributions over the £1000/private residential unit allowance in the appraisals), abnormal costs if not taken into account in the actual land price paid, variations to costs in particular schemes, a further incentive to the landowner to release land. Given the uncertainties surrounding viability appraisal, the overage is of course an approximate indicator, which should be used cautiously. A formula is not applied to arrive at an appropriate level of CIL charge, a judgement is made based on the overage.
Pre-DCS1	27.08	National Grid Property	Deloitte	The requirement for additional information of the approach is justified by a review of the latest scenarios for the southern zone. While the Council's consultants have not yet considered the worst case, it is clear from the latest summary table that at least one of the scenarios would not be viable if the Council collected CIL at £400 psm and overage	CIL as proportion of overage	The appraisals have been modelled assuming a 40% affordable housing requirement and the CIL surplus is

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		Holdings		required affordable housing at 40%. It is appropriate for the Council's Charging Schedule to recognise that there may be circumstances when the level of affordable housing may need to be reduced, but it is inappropriate to propose a level of CIL which automatically requires a lower level of affordable housing in order to achieve a viable development.	Affordable housing %	calculated after this and other policy costs have been paid.
Pre-DCS1	27.09	National Grid Property Holdings	Deloitte	<u>3. Phasing</u> Now that the viability assessment includes larger projects, it is important that we understand the assumptions that have been made in relation to phasing and the rates of sale for the residential units.	Phasing Sales/void rates	Phasing assumptions are set out in the Appendix to the Viability Study.
Pre-DCS1	27.10	National Grid Property Holdings	Deloitte	In this context it is important to understand the Council's proposed CIL instalment policy. Please can further information be provided on this issue.	Instalments	The Council currently does not expect that it will introduce its own instalment policy. Therefore, the Mayor of London's CIL instalment policy will apply to Mayoral and borough CIL payments.
Pre-DCS1	27.11	National Grid Property Holdings	Deloitte	<u>4. Site Preparation and Infrastructure</u> We discussed last week that the appraisals include a higher level of potential cost for site preparation and infrastructure, at 5% of the total construction costs. It is important to note that even at this level there may be an insufficient allowances for abnormal costs such as those that might be accrued at NGP's Imperial Road site, the costs of service connections and other infrastructure, and the level of site specific s106 costs that could arise from developments. For example, using the PDCS assumption that an additional 20% of the CIL charge will be paid via a s106 agreement, the s106 cost for the 750 unit mixed scheme could be £2.7m. On this basis, we don't accept that increasing the allowance to 5% of construction costs will necessarily reflect the additional costs and risks associated with strategic sites.	Abnormals Site preparation and infrastructure S106 costs – anticipated	The Viability Study methodology expects that abnormal costs would be reflected in the land costs, therefore, they would effectively reduce the Benchmark Land Value. However, the Viability Study methodology allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the overage, since only a small proportion is taken for CIL. An allowance of £1,000 per unit has been factored within the appraisals for S106 costs. It is anticipated that site specific S106 obligations may be appropriate on non-residential schemes where justified.
Pre-DCS1	27.12	National Grid Property Holdings	Deloitte	As discussed last week, we believe that it would be beneficial to hold a joint meeting between the Council, its advisers and interested landowners prior to the publication of the draft CIL charging schedule. NGP would be interested in taking part in this exercise.	Meeting	Meeting was held after PDCS
Pre-DCS2	13.01	Berkeley Group	Quod	<u>Affordable Housing Mix</u> Affordable and social rent tenures Why have these tenures been included given the LBHF policy on the housing ladder of opportunity?	Affordable housing	Social rent tenures apply only in White City East and Earls Court West Kensington appraisals because of the policies for those areas. Affordable rent is included in accordance with Core Strategy Policy H2.
Pre-DCS2	13.02	Berkeley Group	Quod	<u>Floorspace Sizes</u> NIA 63.75 m2 686/ft2 on the small side as an average	Floorspaces	No alternative suggested. The size is considered to be satisfactory for CIL purposes.
Pre-DCS2	13.03	Berkeley Group	Quod	<u>Benchmark Land Values</u> North, Central and South It does not make sense that a site in the north of the Borough will be worth 5 times less than one in the south.	BLVs	The approach to setting benchmark land values is explained in Appendix A of the Viability Study
Pre-DCS2	13.04	Berkeley Group	Quod	<u>Development Cost, Residential and Mixed Use Scheme</u> All Private Residential Flats, £1,900/m2 £175/ft2 gross £207/ft2 net Too low - at least £250 net	Build costs - residential	The approach to cost figures is explained in Appendix A of the Viability Study.
Pre-	13.05	Berkeley	Quod	<u>Development Costs, Build Costs</u>	Build costs –	The approach to cost figures is explained in

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DCS2		Group		Retail Comparison - £925 m2 Retail Convenience - £1,100/m2 Hotel - £1,080/m2 £100/ft2	commercial	Appendix A of the Viability Study.
Pre-DCS2	13.06	Berkeley Group	Quod	<u>Development Costs, Residential Sales and Costs</u> Marketing, £1,000 Nowhere near enough. At least £15K per flat	Marketing costs	Marketing costs are included within the revised financial model at £1,000 per private residential unit which is a recognised industry standard
Pre-DCS2	13.07	Berkeley Group	Quod	<u>Development Costs</u> S106 and CIL £1,000/unit Residual S106 looks too low when analysing LBHF policies	S106 costs	The £1,000/dwelling allowance is for minor S106 costs. There may still be site specific S106 costs depending on the particular scheme and the justification. The viability methodology assumes that only a relatively small proportion of the overage will be taken for CIL, allowing considerable headroom which would partly be available to fund such S106 obligations. However, it would be expected that compliance with policy would be taken onto account in the price paid for land.
Pre-DCS2	13.08	Berkeley Group	Quod	<u>Development Values</u> North Private Residential Flats, £5,700/m2 £529/ft2	Values – residential - north	No comment necessary
Pre-DCS2	13.09	Berkeley Group	Quod	<u>Development Values</u> South Private Residential Flats, £10,350/m2 £961/ft2 – too high for South sides or for non riverside	Values – residential - south	The rates are considered to be reasonable.
Pre-DCS2	13.10	Berkeley Group	Quod	<u>Development Values</u> Commercial Retail Convenience Yield, 4.80% Assumes very strong covenant	Retail values	No comment necessary
Pre-DCS2	13.11	Berkeley Group	Quod	<u>Build periods</u> 19 months to build 500 homes 5-6 years more realistic	Phasing – construction – 500 units	The Viability Study has reviewed phasing and amended where appropriate.
Pre-DCS2	13.12	Berkeley Group	Quod	<u>Build periods</u> 19 months to build 750 homes 80 – 100 homes per year is realistic. The interest rate would be much higher.	Phasing – construction – 750 units	The Viability Study has reviewed phasing and amended where appropriate.
Pre-DCS2	13.13	Berkeley Group	Quod	<u>Build periods</u> In reality sales would be in parallel with construction.	Phasing – construction and sales	Much of the phasing for larger sites overlaps with construction but some sales continue after completion of construction.
Pre-DCS2	17.01	Stanhope	Gerald Eve	<u>Development Costs</u> The residential build costs look to be based on BCIS data and the CLG guide on additional costs for CfSH Level 4. BCIS rates do not adequately reflect site constraints and premium rates that are prevalent on London at present	Build costs - residential	The approach to cost figures is explained in Appendix A of the Viability Study. An additional 5% on costs is included for plot externals. The Viability Study methodology expects that abnormal costs would be reflected in the land costs, therefore, they would effectively reduce the Benchmark Land Value. The WCOA DIFS also took this view which is clearly stated on pages 42/43. However, the Viability Study methodology

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						allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the overage, since only a small proportion is taken for CIL.
Pre-DCS2	17.02	Stanhope	Gerald Eve	<u>Development Costs</u> It follows from the above and from other current schemes that the figures are at 10% below what would be expected, particularly given this is an area wide viability exercise	Build costs - residential	See Appendix A of the DVS Viability Study for basis of build costs.
Pre-DCS2	17.03	Stanhope	Gerald Eve	<u>Development Costs</u> Services and externals are typically taken as being between 8-15% of unit build costs (5% therefore is an underestimate)	External works	5% is considered to be a satisfactory estimate for CIL purposes.
Pre-DCS2	17.04	Stanhope	Gerald Eve	<u>Development Costs</u> Professional fees range between 10% to 12.5% - again we would suggest the upper level of the range for area wide viability assessments	Professional fees	Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs at 10%
Pre-DCS2	17.05	Stanhope	Gerald Eve	<u>Development Costs</u> Sales and Marketing should equate to between 3%-6% of sales value. The figures presented cumulatively are only 1.7%	Marketing and sales costs	Marketing costs are included within the revised financial model at £1,000 per private residential unit which is a recognised industry standard.
Pre-DCS2	17.06	Stanhope	Gerald Eve	<u>Development Costs</u> It is not clear to what extent s106 has been scaled back	S106 costs	
Pre-DCS2	17.07	Stanhope	Gerald Eve	<u>Development Values</u> Profit for area wide assessments are better performed on an Internal Rate of Return (IRR) basis which allows for growth and sensitivity testing	Profit	CIL appraisals are expected to be based on present day values rather than taking account of growth. Whilst it is recognised that the IRRs alternative method is often adopted for measure profitability and particularly, for comparing the profitability of different investments, this approach has not been adopted. The appraisals assume a target developer return of 20% on total development costs which may vary, depending upon developer attitude towards risk.
Pre-DCS2	17.08	Stanhope	Gerald Eve	<u>Development Values</u> Finance costs do not reflect the costs and availability of finance for smaller developers and the level of equity input now required. Again for area wide viability assessment rates of 8%plus are more appropriate	Finance costs	7% is considered to satisfactorily reflect market rates for CIL purposes.
Pre-DCS2	17.09	Stanhope	Gerald Eve	<u>Development Values</u> The affordable housing rent levels appear high in the absence of grant	Values – residential - affordable	No alternative is suggested by the commenter. The rent levels are considered to be acceptable.
Pre-DCS2	17.10	Stanhope	Gerald Eve	<u>Development Values</u> Yield levels generally are between 25bpts and 50bpts too high given (i.e. they should be moved out) the area wide viability context	Yields	Yield levels are considered to be satisfactory.
Pre-DCS2	17.11	Stanhope	Gerald Eve	<u>Development Programme</u> The sales rates appear to be high given the area wide context. This may be perhaps considered in testing viability through running sensitivity tests	Phasing – sales	The comment makes no suggestion about alternative rates.
Pre-DCS2	17.12	Stanhope	Gerald Eve	<u>Benchmark Land Values</u> Values look inconsistent with transactions and comparable evidence in LBHF and do not seem to reflect such matters of density which is an important aspect/function of land value	BLVs	The approach to setting benchmark land values is explained in Appendix A of the Viability Study
Pre-	17.13	Stanhope	Gerald	<u>Benchmark Land Values</u>	BLVs	BLVs for mixed use sites are set at the

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DCS2			Eve	How are land values dealt with for mixed use sites		same level as for residential only sites.
Pre-DCS2	17.14	Stanhope	Gerald Eve	<u>Unit Floor Space Ratios</u> NIA/GIA ratio should be c. 80% not 85% again having regard to the context of this being an area wide viability assessment.	Floorspaces	Not clear whether the comment is suggesting that NIA should be reduced or GIA increased. The sizes are considered to be satisfactory for CIL purposes.
Pre-DCS2	27.01	National Grid Property Holdings	Deloitte	While it is difficult to comment on the assumptions without seeing how they are used in the development appraisals, we offer the following observations	General	See more specific comments
Pre-DCS2	27.02	National Grid Property Holdings	Deloitte	Please can the revised appraisals be shared with us before they are published as part of the Draft Charging Schedule.	General	The full set of appraisals will be published at the DCS stage.
Pre-DCS2	27.03	National Grid Property Holdings	Deloitte	It appears that the advisors continue to use one assumption for each variable, such as sales values, construction costs etc. For the analysis to be suitably robust, it is vital that more sensitivities are tested and for a more fine grained approach to be taken.	Sensitivities	Proposed charge rates are not set at a level that would absorb all the overage so are still capable of being viable, even when market sensitivities are tested.
Pre-DCS2	27.04	National Grid Property Holdings	Deloitte	Linked to this point is the absence of evidence to justify each of the rates that are used for the key variables. Please can evidence be provided of sales values, construction costs, benchmark values etc before we comment on these inputs.	Evidence	This is explained in Appendix A of the Viability Study.
Pre-DCS2	27.05	National Grid Property Holdings	Deloitte	The phasing schedule that you circulated is difficult to follow in respect of the appraisals to which it relates and how it corresponds with the reality of these types of developments. Please can you send us the phasing profile as set out in each Argus Developer appraisal to be submitted as part of the evidence.	Phasing – construction and sales	This is available in the appendices to the Viability Study.
Pre-DCS2	27.06	National Grid Property Holdings	Deloitte	We note that the advisers have increased the sales rates for private residential flats in the South Zone to £10,350/m ² . Prior to undertaking sensitivity analysis, we would expect the starting point for the appraisal to use a value for this Zone to be reflective of an average for the entire Zone. We have not had sight of the evidence that supports the increase in average sales value that has now been adopted. Clearly the appraisal needs to consider whether the CIL charge can be absorbed anywhere in the Zone, so it is vital that appropriate values are considered, particularly given the variety of development sites that exist.	Values – residential - south	The basis of sales values is explained in Appendix A of the Viability Study for the DCS.
Pre-DCS2	27.07	National Grid Property Holdings	Deloitte	We note that assumptions are included for site preparation, abnormals etc for Earls Court West Kensington. Please can equivalent figures be provided for the South Zone. In the case of NGP's land at Imperial Road, we are dealing with a very real strategic opportunity which will have major abnormal costs. It is therefore essential that adequate allowance is made in the appraisals for these costs.	Abnormal costs	<p>In the case of ECWK, abnormal costs were estimated by DVS in carrying out the appraisal of the SPD for the area, though this estimate included highways and public transport costs which might normally be identified for S106 purposes.</p> <p>There is no estimate of the abnormals available to the Council for the NGP land. In any event, the Viability Study approach is that these would normally lead to a reduction in land cost (i.e. below the benchmark land value), since a developer would take abnormal costs into account in deciding what it was possible to pay for the land. However, the Viability Study methodology allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the</p>

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
						overage, since only a small proportion is taken for CIL.
Pre-DCS2	27.08	National Grid Property Holdings	Deloitte	We consider that the total marketing budget (for sales agents and marketing costs) should be 4% of the GDV. The current levels are too low in our opinion.	Marketing	Marketing costs are included within the revised financial model at £1,000 per private residential unit which is a recognised industry standard.
Pre-DCS2	27.09	National Grid Property Holdings	Deloitte	Likewise, we consider that the total professional fees should be 12.5%.	Professional fees	Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs at 10%
Pre-DCS2	27.10	National Grid Property Holdings	Deloitte	It is unclear what value there is to include an assumption of £1,000/unit for s106 costs, given that the table includes such a substantial caveat that the assumption “does not represent the full s106 costs”. This is particularly in the context of figure 3.2 of the PDCS, which suggests that the receipts from s106 will be approximately a fifth of the CIL receipts. If that was to be the case, the s106 costs per dwelling would be a lot higher than £1,000.	S106 costs	The DCS viability appraisals have an allowance of £1,000/dwelling for minor S106 costs. It is assumed that any remaining major site specific costs would be taken from the viability study's overage (residual land value minus benchmark land value) in addition to CIL. The south zone appraisals show that there would be considerable overage remaining after CIL.
Pre-DCS2	28.01	Imperial College London	Jones Lang LaSalle	We acknowledge receipt of the viability assumptions that are proposed to be used by Peter Brett Associates to inform the Draft Charging Schedule in respect of the Hammersmith CIL. Imperial College London and its team have reviewed the assumptions and, in particular to ensure an accurate comparison for the regeneration area of White City, compared them with the results issued by AECOM last year on behalf of yourselves and the GLA in respect of the White City Opportunity Area Planning Framework (WCOAPF) viability used to inform the DIFF study. From this, we now make the following observations:-	General	See more specific comments
Pre-DCS2	28.02	Imperial College London	Jones Lang LaSalle	<u>Benchmark Land Values</u> We do not believe Peter Brett Associates figure of £14m per Ha (equivalent to £5.67m per acre) is representative of current land values within the White City OAPF. As you are aware, there are a number of significant transactions which have occurred over the last 12 months which would indicate current land values of circa £10m per acre. Last year, AECOM were reporting £9.26m per acre.	BLVs – WCOA	The WCOA DIFS draft report referred to a land price of £9.26M/hectare not per acre but this was updated in the final report to £14M/ha as also used in the CIL appraisals. The approach to setting benchmark land values is explained in Appendix A of the Viability Study.
Pre-DCS2	28.03	Imperial College London	Jones Lang LaSalle	<u>Development Values</u> Private Residential Flats - When AECOM assessed sales values for carrying out the DIFF study in 2012, they determined that an appropriate value would be £5,400/m². The Peter Brett Associates proposed figure is 30% higher and we are not aware of any evidence, in the WCOAPF area, where these values are being achieved.	Values – residential – WCOA	The approach to setting sale values is explained in Appendix A of the Viability Study. In the final DIFS study the values were increased to £6.9-£8K.
Pre-DCS2	28.04	Imperial College London	Jones Lang LaSalle	<u>Benchmark Land Values</u> Intermediate Residential - AECOM assessed these sales values at between £2,250/m² and £2,420/m². This is over 10% less than the values proposed by Peter Brett Associates.	Values – residential – intermediate – WCOA	The approach to affordable housing values is explained in Appendix A of the Viability Study.
Pre-DCS2	28.05	Imperial College London	Jones Lang LaSalle	Commercial Offices - AECOM assessed commercial offices at a rental level of £215/m². This compares with Peter Brett Associates at £250/m². Although, AECOM's rent is set against a lower yield, the effective capital value reported by AECOM is still less than 10% of the capital value proposed by Peter Brett Associates.	Values – commercial – WCOA	In the final report AECOM assumed office rents at £377/m². The approach to commercial values is explained in Appendix A of the Viability Study.
Pre-DCS2	28.06	Imperial College	Jones Lang	Hotel - AECOM assessed the annual rent at £6,000/bed per annum, nearly half the £11,000/bed per annum identified	Values – hotel -	The Viability Study has reduced the value to £6,500/room.

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Stage	Rep #	Organisation	Agency	Representation	Issue	Response
		London	LaSalle	by Peter Brett Associates. Yield assumptions were the same in both cases. Therefore, Peter Brett Associates are suggesting hotel values are nearly double compared with AECOM.	WCOA	
Pre-DCS2	28.07	Imperial College London	Jones Lang LaSalle	<u>Development Costs</u> Private Residential Flats - We do not believe it is possible to deliver good quality residential flats for £1,900/m ² (certainly not flats that could be considered to achieve a value of £7,000/m ²). AECOM assessed the costs at between £2,530 and £3,000/m ² .	Build costs - residential	As stated in the AECOM report on the DIFS, build costs include 12.5% professional fees and 5% contingency. The Viability Study appraisals show fees and contingency on costs as separate items. Therefore, the net difference is considerably less. The approach to cost figures is explained in Appendix A of the Viability Study.
Pre-DCS2	28.08	Imperial College London	Jones Lang LaSalle	<u>Development Costs</u> Commercial Offices - AECOM assessed costs of £2,210/m ² compared with Peter Brett Associates at £2,045/m ² .	Build costs - commercial	As stated in the AECOM report on the DIFS, build costs include 12.5% professional fees and 5% contingency. The Viability Study appraisals show fees and contingency on costs as separate items. Therefore, the net AECOM cost is lower than that in the Viability Study.
Pre-DCS2	28.09	Imperial College London	Jones Lang LaSalle	<u>Development Costs</u> External Works - The 5% allowance used by Peter Brett Associates for external works could be considered a reasonable assumption to cover 'normal' external works costs. However, this would be insufficient to cover any abnormal infrastructure costs, expected for difficult regeneration sites such as those to be found within the White City OAPF. AECOM assessed the abnormal infrastructure costs that will have to be budgeted for these sites at circa £80m. For the proposed White City OAPF design, this equated to approximately 5% of the base construction costs. Therefore, the overall allowance for normal external works and abnormal infrastructure should be 10%. It is also important to note that these AECOM figures excluded the £56m of 'Essential Infrastructure' identified as vital for the regeneration of White City. It was assumed that this would be covered by the tariff/CIL. If it is not, then any viability assumptions produced by Peter Brett Associates, must also accommodate these costs.	External works / abnormal	In the DIFS AECOM assessed abnormal site specific costs, however, the DIFS clearly states on pages 42/43 that these costs would be expected to lead to a reduction in land price. The Viability Study methodology takes the same approach but allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the overage, since only a small proportion is taken for CIL. For the DCS, the cost of other essential infrastructure has been taken onto account, leading to a £0 CIL differential charge for White City East.
Pre-DCS2	28.10	Imperial College London	Jones Lang LaSalle	<u>Development Costs</u> Professional Fees - The allowance appears low and should be between 10 and 12%. In summary, we believe the values in many cases appear inflated and the costs understated.	Professional fees	Professional fees are based upon accepted industry standards and are calculated as a percentage of build costs at 10%
Pre-DCS2	29.01	BBC	Lambert Smith Hampton	I understand that at the DCS stage, full viability appraisals using the final viability assumptions will be published to inform your proposed CIL charges, alongside full responses to representations received on the Preliminary DCS. In short it will remain important for us to provide a formal response to the proposed viability assumptions at the DCS stage. At this stage we will expect that the assumptions particularly relating to values to be fully evidenced and the hypothesis which is used to create the proposed values per hectare for theoretical 10,50,500, and 750 unit schemes explained.	General	See more specific comments
Pre-DCS2	29.02	BBC	Lambert Smith Hampton	<u>Land Value Benchmarks</u> I think commenting on whether we think the values proposed in the tables sent are accurate at this time is pointless without understanding what assumptions were applied in this instance. For example are these values reflecting "Market Value" through comparable evidence, theorised based on residual assumptions and do they take into account reasonable head room in the flexibility of potential values of land per hectare in each range of scheme. I am sure this will be explained more fully as part of the formal process which will enable us to fully judge if the	BLVs	The approach to setting benchmark land values is explained in Appendix A of the Viability Study.

Stage	Rep #	Organisation	Agency	Representation	Issue	Response
				proposed land value benchmarks are appropriate for CIL calculation. We will also be interested to know what assumed affordable housing levels are anticipated within the benchmark land values and how these compare to recent planning permissions.		
Pre-DCS2	29.03	BBC	Lambert Smith Hampton	<u>Land Value Benchmarks</u> I also note that you have a single land value across the Borough for various other commercial uses other than residential. I would assume that the DCS stage will also explain why set difference in values by geography in relation to these other uses (surely offices near the river might gain a premium over those in the north of the Authority as reflected in the anticipated varying office rents you put forward). Furthermore in my experience there has been quite a lot of debate about the differing values achievable through different A1 occupiers – for example bulky good retail does not achieve similar rents to unrestricted A1, similarly covenant strength is a factor, such as the difference between Tesco and a local food trader.	BLVs – commercial	The approach to setting benchmark land values is explained in Appendix A of the Viability Study.
Pre-DCS2	29.04	BBC	Lambert Smith Hampton	<u>Land Value Benchmarks</u> Finally I notice that the land values for Offices, HTC Offices, Retail comparison, Retail convenience and hotel are all £10m per hec. I would be interested to understand how this has been concluded and why there isn't some variation between the types. I would also be interest to know how a reasonable CIL is assessed for uses not within the categories proposed, such as Health and Student uses.	BLVs - commercial	The approach to setting benchmark land values is explained in Appendix A of the Viability Study. The BLVs are now different in some cases.
Pre-DCS2	29.05	BBC	Lambert Smith Hampton	I would also be interest to know how a reasonable CIL is assessed for uses not within the categories proposed, such as Health and Student uses.	Health and Student Uses	Please see Viability Study.
Pre-DCS2	29.06	BBC	Lambert Smith Hampton	<u>Unit sizes</u> I appreciate the approach of assumed sites for residential and the calculated coverage are rather straight forward to gauge floor area. However, I assume evidence will be provided as part of the DCS to support why the particular site areas have been chosen. I assume as process such as of assessing the previous planning consents and assessing the average size of the previous schemes has been done to support the areas proposed.	Floorspaces – residential	The sizes chosen for the larger appraisals were chosen based on an assessment of schemes in the borough to produce appropriate alternative densities for testing. The precise site areas are not important in that the results would be pro-rata for smaller or larger sites.
Pre-DCS2	29.07	BBC	Lambert Smith Hampton	<u>Unit sizes</u> I also assume that a similar exercise has been carried out to demonstrate that assessing a single area size for commercial uses is justifiable and proportionally representative of the various uses in LBHF. I would have thought that like residential units offices vary significantly in size and the size impacts the occupant which influences the potential income and investment value. Therefore, I would anticipate a discussion as to whether more than one office floor space calculation per area is required to demonstrate that a viable CIL is achievable.	Floorspaces – commercial	There are two sample large site appraisals which have different quantities of commercial and residential floorspace.
Pre-DCS2	29.08	BBC	Lambert Smith Hampton	<u>Unit sizes</u> In regards to the residential units, although the sizes look familiar I assume the DCS stage will include evidence to show that these reflect the average size of units in LBHF and that there is no significant geographical variation in sizes.	Floorspaces – residential	The unit sizes are considered to be reasonable for viability testing.
Pre-DCS2	29.09	BBC	Lambert Smith Hampton	<u>Affordable Housing Mix</u> I assume that the proposed affordable mixes are reflective of LBHF affordable policy, which seems a reasonable position to start. I would however be interested to know how these are consistent with the proposed land value benchmarks.	Affordable housing	Yes - the affordable housing mixes are in accordance with LBHF policy. It would be expected that land value would take account of policy requirements for development and the benchmark land values are consistent with that approach..
Pre-DCS2	29.10	BBC	Lambert Smith Hampton	<u>Costs</u> At the formal stage I would anticipate some explanation of why the private and affordable build costs are the same in all instances and why no variation has been made for anticipated fit out differences between the two types or why no additional build cost has been applied to represent high rise development.	Build costs – residential	The approach to cost figures is explained in Appendix A of the Viability Study.
Pre-DCS2	29.11	BBC	Lambert Smith Hampton	<u>Costs</u> I seek an explanation of how a single figure for commercial construction by use was concluded. I would be interested to know if this takes account of sustainability costs/ policies which are anticipated and the impact of any BREAM changes.	Build costs – commercial	The approach to cost figures is explained in Appendix A of the Viability Study.


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Stage	Rep #	Organisation	Agency	Representation	Issue	Response
Pre-DCS2	29.12	BBC	Lambert Smith Hampton	<p><u>Costs</u></p> <p>Although I note allowances have been made for external works, professional fees, and contingency, I cannot see where an allowance for abnormal costs has been made. Unless this has already been incorporated within the standard build cost, I would anticipate that individual schemes may include costs over and above those identified in say RICS BCIS data. I therefore think to ensure the CIL is robust that this is taken into account. I note that additional costs have been allowed for in the Earls Court appraisal and whilst they may not be to the same amount in other schemes, I would suggest that site preparation costs and abnormal costs should be accounted for across the board.</p>	Abnormals	<p>The allowance of 5% on costs for externals includes for normal site preparation and on-site infrastructure.</p> <p>The Viability Study methodology expects that abnormal costs would be reflected in the land costs, therefore, they would effectively reduce the Benchmark Land Value. The WCOA DIFS also took this view which is clearly stated on pages 42/43. However, the Viability Study methodology allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the overage, since only a small proportion is taken for CIL.</p>
Pre-DCS2	29.13	BBC	Lambert Smith Hampton	<p><u>Costs</u></p> <p>I am unsure why there is a difference in anticipated agent's fees between Earls Court and other areas. I assume it is because it is known for Earls Court. I would suggest it would be simpler to have a single agent's fee rather than justifying why there is a difference.</p>	Agents fees	The agents fees are now consistent.
Pre-DCS2	29.14	BBC	Lambert Smith Hampton	<p><u>Costs</u></p> <p>I assume residential sale legal fees and marketing are by unit rather than per appraisal? However, I would suggest a percentage application here may be more accurate, as has been used for commercial sales.</p>	Marketing and sales and legal costs	Marketing costs are included within the revised financial model at £1,000 per private residential unit which is a recognised industry standard
Pre-DCS2	29.15	BBC	Lambert Smith Hampton	<p><u>S106</u></p> <p>I assume that the average S106 cost per unit has been calculated by considering the last several years of planning applications, removing from this the items which will be collected from CIL and working out a reasonable average to apply to the appraisals across the board. I would therefore anticipate an explanation of this at the formal stage.</p>	S106 costs	Reference has been made to past schemes which confirms that an average £1,000 S106 cost per private dwelling is a reasonable assumption.
Pre-DCS2	29.16	BBC	Lambert Smith Hampton	<p><u>Costs</u></p> <p>Given this cost is calculated on a unit basis, is it correct to assume that no section 106 has been previously collected on non-residential schemes and that it is not anticipated any S106 costs will be collected on non-residential schemes in the future. I would be interested to understand how this works with mixed use schemes.</p>	S106 costs	It is anticipated that site specific S106 obligations may be appropriate on non-residential schemes where justified.
Pre-DCS2	29.17	BBC	Lambert Smith Hampton	<p><u>Profit and Finance</u></p> <p>The profit level at 20% on cost across all developments is the minimum I would anticipate. However, Developers are increasingly asking for higher levels to reflect the perceived risks from bank finance. It may be more appropriate to assess a range of profit levels to reflect that risk and profit will vary between schemes and this way the review will be more robust at the margins. However, I would also suggest the calculation is done on GDV (i.e 17%) to reflect the GLA viability assessment advice.</p>	Profit	20% on costs is considered to be a reasonable level for CIL viability testing.
Pre-DCS2	29.18	BBC	Lambert Smith Hampton	<p><u>Profit and Finance</u></p> <p>I would agree that the finance costs look accurate; however, again a sensitivity test around this would improve the robustness of the CIL review.</p>	Finance costs	If the finance costs look accurate it is not clear whether sensitivity testing would be beneficial or what alternative rates would be tested.
Pre-DCS2	29.19	BBC	Lambert Smith Hampton	<p><u>Land Acquisition costs</u></p> <p>I would anticipate that legal costs will be associated with all land transactions and not only single use commercial uses and therefore should be applied across the board. I also think that some acknowledgement of planning costs in gaining consent should be included in the appraisal modelling.</p>	Land acquisition costs	<p>Legal costs are included in the CIL viability appraisals.</p> <p>The professional fees allowance includes all such costs.</p>
Pre-DCS2	29.20	BBC	Lambert Smith Hampton	<p><u>Sales Values</u></p> <p>I think it is best to wait for the full report to understand how these various values have been concluded and what they represent and what spec has been assumed. I am unsure why no ground rents have been assumed in flats outside the Earls court area. I would anticipate all private flats to have a ground rent.</p>	Ground rents	The approach to sales values is explained in Appendix A of the Viability Study.

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Pre-DCS2	29.21	BBC	Lambert Smith Hampton	<u>Profit and Finance</u> As noted above the commercial land values don't vary geographically, nor do build costs, but rental values do. I would anticipate there to be a correlation between these proposed assumptions. I assume that a significant amount of evidence will be provided to demonstrate that the chosen sales values reflect a reasonable average taking into account spec and size.	BLVs	The approach to setting benchmark land values is explained in Appendix A of the Viability Study.
Pre-DCS2	29.22	BBC	Lambert Smith Hampton	<u>Profit and Finance</u> Furthermore I would assume that some sensitivity testing around this base value is included in the CIL analysis so that the proposed CIL does not restrict marginalised development and accounts for geographic, and market variations.	Sensitivities	Whilst sensitivity testing could be undertaken the Hammersmith and Fulham area has witnessed an up-turn in property prices in the last 12 months in the order of 11% - 14% demonstrating a dynamic and buoyant residential market. Given these upwards trends, viability is likely to improve over time.
Pre-DCS2	29.23	BBC	Lambert Smith Hampton	<u>Build Cash flows</u> I don't think these look unreasonable at first glance, but would appreciate an explanation of how they were conceived. I think however, whilst a vacancy period appears to be included within the commercial cash flow, I would like to understand where rent frees are included in the calculation and whether the void period reflect current experience.	Phasing – construction and sales	Rent free periods are identified in the viability appraisals accompanying the DCS.
Pre-DCS3	13.01	Berkeley Group (St James)	Quod	Build and marketing costs are extremely low, and in no way reflect the level of investment required to achieved the identified values. It would appear that some of the build costs have reduced since the previous version we commented on, despite significant cost inflation in the sector;	Build costs	Residential build costs are based upon industry data from the Build Cost Information Service (BCIS) which is produced by the Royal Institution of Chartered Surveyors (RICS). The build costs used are derived from recent data of actual prices in the marketplace. For flats upper quartile rates for 6+ storey development have been used. For houses, upper quartile rates have been used. Depending on actual scheme specification costs could greatly vary from the BCIS data. However, the costs are based on a 'typical residential development' in the area with no specific consideration of scheme features which may result in a 'premium' product and could follow through into enhanced sale values.
Pre-DCS3	13.02	Berkeley Group (St James)	Quod	Programme assumptions are unrealistic – there appears to be no planning period, the build period is too short and sales/completion rates too high. They do not appear to make any reflection for the holding costs of a long-term development delivered in phases, nor do they appear to cashflow CIL;	Phasing	The Viability Study has reviewed phasing and amended where appropriate.
Pre-DCS3	13.03	Berkeley Group (St James)	Quod	There is no allowance in White City for abnormal costs or infrastructure costs – unlike Earls Court which appears to be treated as a special case. The DIFs study identifies both site specific infrastructure costs and 'area wide' requirements – in the case of the M+S site, as we have discussed, all of these costs are likely to fall on the developer and there needs to be some kind of credit/equalisation mechanism. Notwithstanding the fact that the DIF study significantly underestimates the costs of decking and delivery for the M+S site, the RTP figures do not appear to take them into account at all	Abnormals	The Viability Study methodology expects that abnormal costs would be reflected in the land costs, therefore, they would effectively reduce the Benchmark Land Value. The WCOA DIFS also took this view which is clearly stated on pages 42/43. However, the Viability Study methodology allows scope for abnormal costs that are not fully reflected in land value to be absorbed from within the overage, since only a small proportion is taken for CIL.

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Pre-DCS3	13.04	Berkeley Group (St James)	Quod	More broadly we are concerned that the approach being taken by RTP/PB does not properly address the CIL guidance which suggests that "The focus should be in particular on strategic sites on which the relevant Plan relies and those sites (such as brownfield sites) where the impact of the levy on economic viability is likely to be most significant." We believe that 'generic' area wide appraisals such as those used previously by RTP/PB do not meet this requirement as they are not properly based on strategic sites and their needs. This is emphasised by the big differences in outcome between the DIFs viability study which does seek to consider site specific costs and the RTP/PB work which doesn't.	Strategic sites	Since the PDCS stage, large site appraisals have been carried out to examine the viability of strategic sites. This includes , White City East which is treated in the DCS as a separate CIL zone. The Viability Study methodology and the DIFS deal with site specific (abnormal) costs in the same way, in that they are expected to be taken off land value (see DIFS pages 42/43).
Pre-DCS3	13.05	Berkeley Group (St James)	Quod	As you are aware there are a number of current/recent appraisals in White City, which have been independently assessed on behalf of the Council, which completely contradict the idea that 40% affordable housing and on site infrastructure can be secured alongside the equivalent of £100/sqm off site contributions. These would appear to be more realistic 'appropriate available evidence' than that produced by RTP/PB in that they are current assessments of real strategic sites in the area.	Affordable housing	The CIL viability appraisals are based on the affordable housing proportions set out in the development plan. If individual sites are shown to have reasons why they are not viable at those proportions of affordable housing, the policy allows the proportion to be varied. For the DCS, the likely costs of future S106 contributions to off-site infrastructure have been taken in to account and this has led to a £0 CIL charge for White City East.
Pre-DCS3	13.06	Berkeley Group (St James)	Quod	We are very concerned that appraisal based on the current assumptions will give a very misleading impression of the capacity of White City, but particularly our site to deliver Affordable Housing, On-Site Infrastructure and Off site contributions. As you are aware there is no site in White City East that has provided anything like 40% affordable housing together with other obligations.	Affordable housing	The CIL viability appraisals are based on the affordable housing proportions set out in the development plan. If individual sites are shown to have reasons why they are not viable at those proportions of affordable housing, the policy allows the proportion to be varied. For the DCS, the likely costs of future S106 contributions to off-site infrastructure have been taken in to account and this has led to a £0 CIL charge for White City East.
Pre-DCS3	13.07	Berkeley Group (St James)	Quod	Given this St James would be keen to meet to discuss these issues with you and your advisers as soon as possible and prior to the publication of the DCS to ensure that any appraisals for White City reflect market realities and site specific viability and deliverability issues. We hope this will be possible.		As the DCS proposes a £0 CIL charge in White City East further discussions are not considered to be necessary.

	<p align="center">London Borough of Hammersmith & Fulham</p> <p align="center">CABINET</p> <p align="center">11 AUGUST 2014</p>
<p>STREET LIGHTING PROGRAMME 2014/15</p>	
<p>Report of the Cabinet Member for Environment, Transport & Residents Services – Councillor Wesley Harcourt</p>	
<p>Open Report</p>	
<p>Classification: For Decision</p> <p>Key Decision: Yes</p>	
<p>Wards Affected: All</p>	
<p>Accountable Executive Director: Nigel Pallace, Bi-borough Executive Director of Transport & Technical Services</p>	
<p>Report Author: Dean Wendelborn, Principal Street Lighting Engineer</p>	<p>Contact Details: Tel: 020 8753 1151 E-mail: dean.wendelborn@lbhf.gov.uk</p>

1. EXECUTIVE SUMMARY

- 1.1. Approval is required to manage the 2014/15 Planned Capital Street Lighting Column Replacement Programme and to carry out planned and general reactive maintenance work over the same period. It is recommended that authority to manage the programme and overall budget throughout the year is delegated to the relevant Council Officers.
- 1.2. The key priorities set out in the report are to:
 - Replace street lighting columns at the end of their serviceable life,
 - Maintain the existing street lighting assets,
 - Reduce carbon emissions, maintenance requirements, and energy costs.

2. RECOMMENDATIONS

- 2.1. That approval be given to use the budgets set out in Section 4.5 of the report to maintain and improve the Council's lighting assets, using the existing public lighting term contractor.
- 2.2. That approval be given for capital replacement of columns that have reached the end of their serviceable life based on structural condition testing (an indicative programme for the replacement of older columns is attached in Appendices 1 and 2).
- 2.3. That authority to make amendments to the capital replacement programme as set out in Appendices 1 and 2 of the report for operational and cost effectiveness reasons, in order to make the optimum use of resources, be delegated to the Cabinet Member for Environment, Transport and Residents Services in conjunction with the Bi-borough Director of Transport and Highways.

3. REASONS FOR DECISION

- 3.1. As Highway Authority, the Council has powers under the Highways Act 1980 to provide street lighting and a duty of care to prevent danger to road users by maintaining those lights.
- 3.2. The lighting assets are maintained through both planned cyclical maintenance and reactive maintenance. The planned maintenance regime is carried out in accordance with national best practice. Maintenance of lighting assets is necessary to keep them in a condition that is safe for road users. Many of the lighting assets in the borough could cause serious harm to road users if they are not properly maintained.
- 3.3. Records of inspections and remedial action taken are valuable in defending claims received for accidents and injuries.

4. INTRODUCTION AND BACKGROUND

- 4.1. There is no statutory requirement to provide street lighting. However if an authority does provide lighting, then it must comply with best practice and national standards.
- 4.2. The street lighting service is responsible for:
 - The delivery of new street lighting projects such as column and lantern replacements

- The maintenance of illuminated assets including; street lights, bollards, flashing beacons, and other street furniture such as traffic signs, pay and display machines and decorative lighting.
 - Inspections to ensure that street lighting assets are safe and working properly
- 4.3. It is responsible for maintaining 8,700 streetlights; 2,500 illuminated signs,; and 18,900 non illuminated signs as well as special lighting and features such as the fountain in Lyric Square fountain, subway lighting and lighting on the Grade II listed Hammersmith Bridge. A detailed summary of each programme is set out in Appendix 3.
- 4.4. The Council has a corporate target to reduce the borough's carbon emissions. Street lighting accounts for approximately 21% of the Council's total energy usage. As part of the street furniture refurbishment programme we have introduced new technologies that are more energy efficient and have lower maintenance requirements.
- 4.5. Although this year's budget is based on previous years, it includes savings targets based on actual outturn from the previous year, and therefore should not impact on any of the work currently undertaken.

Activity	Budget 2013/14	Budget 2014/15
Capital column replacement	£516,000	£369,000
Lighting Roads - Planned Including defects to; <ul style="list-style-type: none"> • Street lights • Illuminated signs • Non-illuminated signs • Illuminated/Solar powered bollards • Flashing/centre island beacons • Damage caused from Road Traffic Accidents 	£477,300	£426,000
Lighting Roads - General	£136,900	£127,100
Public Lighting Energy	£675,000	£551,800

5. PROPOSAL AND ISSUES

- 5.1. Approval is sought to replace lighting columns on the roads listed in the Appendices, subject to on-going structural testing to ensure that columns that are found to be in a potentially dangerous condition are prioritised for replacement. .

Approval is also sought to carry out reactive and routine maintenance work throughout the borough to ensure public safety.

- 5.2. Officers receive residents' requests to install ornate heritage columns and lights. Whilst we would generally propose more costly heritage columns where they are appropriate in conservation areas, it is not sustainable to roll these out more widely due to the additional cost of the materials. Also, as the lamps are less efficient they may require more columns and power connections than newer, modern units. The modern units are in keeping with the previous column look, with a curved bracket and oval shaped lantern, which give the added benefit of shining all light down onto the highway, minimising spill light.

6. OPTIONS AND ANALYSIS OF OPTIONS

- 6.1. The Council has a legal duty to maintain its lamp columns. Officers undertake conditions surveys to maintain assets in a safe condition; those not meeting this condition need to be replaced.
- 6.2. A lighting design is undertaken for each road being re-lit which requires specialist knowledge and expertise. The design process determines the optimum lighting layout and type of light for each road. New lighting is designed to meet current standards according to best practice, and to minimise the impact on residents.

7. CONSULTATION

- 7.1. Ward Councillors will be notified of works in writing, in advance of notification letters being sent to residents on affected roads.
- 7.2. Emergency services will be advised of roads subject to works shortly before works begin.
- 7.3. Residents on affected roads will be advised in writing of the Council's requirement to replace the street lights on their road, shortly before work commences.

8. EQUALITY IMPLICATIONS

- 8.1. The proposed works do not cause any notable changes to equality. An Equality Impact Assessment is published separately.

9. LEGAL IMPLICATIONS

- 9.1. The Council is responsible for maintaining highways that are maintainable at the public expense. It has a specific power to provide lighting for the purpose of highways and to maintain the lighting works as it considers

necessary under Section 66 of the Highways Act 1980 .The Council should exercise due care in carrying out any works as, if by reason of the execution of works carried out under Section 66 any person sustains damage, the Council as highway authority may be liable to pay that person compensation in accordance with Section 66(3) of the Act.

- 9.2. Although there is no legal requirement for notification, good practice suggests that the Council should give reasonable notice to any affected persons when work is to be undertaken.
- 9.3. There are no further legal implications arising from the proposals contained in the report.
- 9.4. Implications verified/completed by: Alice Balme, Foreign Qualified Solicitor, 0208 753 6918

10. FINANCIAL AND RESOURCES IMPLICATIONS

- 10.1. The capital budget for Column Replacements in 2013-14 was £516,000, including balances brought forward. From 2014-15 onwards, the annual capital budget is programmed to be £369,000, although this is subject to change.
- 10.2. The Revenue budget for maintenance works totals £553,100. The energy budget is not available for maintenance works. However, the energy budget can be influenced by maintenance works — for example if lower energy bulbs are installed in lamp columns.
- 10.3. This report does not specify the expenditure expected in each year. Officers must ensure that they manage costs to remain within the capital and revenue budget in any given year.
- 10.4. Implications verified/completed by: Giles Batchelor, Finance Manager, Ex 2407.

11. RISK MANAGEMENT

- 11.1. As Highway Authority, the Council has power under the Highways Act 1980 to provide lighting, while also having a duty of care to prevent danger to road users. Management of Statutory Duty is noted on the Bi-Borough Enterprise Wide Risk Register as risk number 6, including the subsidiary risks, non-compliance with laws and regulations, and breach of duty of care. The duty to prevent danger to road users is fulfilled by undertaking an annual replacement and maintenance programme to minimise risks to the Council and road users.
- 11.2. Details of our asset inventory, including asset history, are stored in the Council's database system.

11.3. Implications verified/completed by: Dean Wendelborn, Principal Street Lighting Engineer, Tel: 020 8753 1151.

12. PROCUREMENT AND IT STRATEGY IMPLICATIONS

12.1. There are no procurement related issues as any works will be carried out under the Council's Lighting Term Contract

12.2. Implications to be verified/completed by: Alan Parry, Procurement Consultant (TTS), Ex 2581.

LOCAL GOVERNMENT ACT 2000 **LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT**

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
1.	Term Contract for Public Lighting and Ancillary Works	Catherine Irvine Ex 2774	Bi-Borough Legal Services

LIST OF APPENDICES:

Appendix 1: Light Column Replacement Road List

Appendix 2: Light Column Replacement Road Map

Appendix 3: Detailed Programme Description

Appendix 4: EIA Assessment

Street Lighting Replacement Programme - 2013 to 2018

NAME	Ward	Existing Column Type
2013-2014		
PHASE 1		
BLACK LION LANE	Ravenscourt Park	Steel
NORTH VERBENA GARDENS	Ravenscourt Park	Steel
ST PETER'S GROVE	Ravenscourt Park	Steel
ST PETER'S SQUARE	Ravenscourt Park	Steel
ST PETER'S VILLAS	Ravenscourt Park	Steel
NORTH EYOT GARDENS	Ravenscourt Park	Steel
ST PETER'S ROAD (partial)	Ravenscourt Park	Steel
PHASE 2		
ALTHEA STREET	Sands End	Concrete
ASHCOMBE STREET	Sands End	Concrete
BELTRAN ROAD	Sands End	Concrete
BELTRAN ROAD	Sands End	Concrete
BREER STREET	Sands End	Concrete
BROOMHOUSE LANE	Palace Riverside/Sands End	Concrete
BROUGHTON ROAD APPROACH	Sands End	Concrete
BROUGHTON ROAD	Sands End	Concrete
BYAM STREET	Sands End	Concrete
CARNWATH ROAD (partial)	Sands End	Concrete
CLANCARTY ROAD	Parsons Green and Walham/ Sands End	Concrete
CRANBURY ROAD	Sands End	Concrete
DAISY LANE	Sands End	Concrete
DE MORGAN ROAD	Sands End	Concrete
DYMOCK STREET	Sands End	Concrete
EDENVALE STREET	Sands End	Concrete
ELBE STREET	Sands End	Concrete
ELLSWICK STREET	Sands End	Concrete
FRISTON STREET	Sands End	Concrete
FULHAM HIGH STREET	Palace Riverside	Concrete
FURNESS ROAD	Sands End	Concrete
GILSTEAD ROAD	Sands End	Concrete
GLENROSA STREET	Sands End	Concrete
HAMBLE STREET	Sands End	Concrete
HAZLEBURY ROAD	Sands End	Concrete
HUGON ROAD	Sands End	Concrete
KILKIE STREET	Sands End	Concrete
LANGFORD ROAD	Sands End	Concrete
LINDROP STREET	Sands End	Concrete
MARINEFIELD ROAD	Sands End	Concrete
NARBROUGH STREET	Sands End	Concrete
OAKBURY ROAD	Sands End	Concrete
POTTERS ROAD	Sands End	Concrete
QUERRIN STREET	Sands End	Concrete
ROSEBURY ROAD	Sands End	Concrete
SETTRINGTON ROAD	Sands End	Concrete
SNOWBURY ROAD	Sands End	Concrete
SULIVAN ROAD	Sands End	Concrete
TYNEMOUTH STREET	Sands End	Concrete
WATERMEADOW LANE	Sands End	Concrete
WOOLNEIGH STREET	Sands End	Concrete
PHASE 3 2013/14 Q4 and 2014/15 Q1		
BARB MEWS (LED)	Addison	Steel
CROMWELL GROVE (Lanterns Only)	Addison	Steel
MELROSE GARDENS	Addison	Steel
MELROSE TERRACE (Lanterns Only)	Addison	Steel
POPLAR GROVE	Addison	Steel
WOODSTOCK GROVE	Addison	Steel
ASHCHURCH TERRACE	Ravenscourt Park	Steel
AURIOL ROAD	Avonmore and Brook Green	Steel
BATSON STREET	Askew	Steel
BEDFORD PASSAGE (LED)	Fulham Broadway/ Munster	Steel
BROOKVILLE ROAD	Munster	Steel
CHALDON ROAD	Munster	Steel
CLIFTON AVENUE	Askew	Steel
DAVISVILLE ROAD	Askew	Steel
EPIRUS MEWS	Fulham Broadway	Steel
EPIRUS ROAD	Fulham Broadway	Steel
HALDANE ROAD	Fulham Broadway	Steel
HARTSMERE ROAD	Fulham Broadway	Steel
HARTSWOOD ROAD	Ravenscourt Park, Askew	Steel
HORDER ROAD	Munster	Steel
KEITH GROVE	Askew	Steel
KINGWOOD ROAD	Munster	Steel
LAMBROOK TERRACE	Munster	Steel
LEFROY ROAD	Askew	Steel
LETCHFORD MEWS (LED)	College Park and Old Oak	Steel
MENDORA ROAD	Fulham Broadway	Steel
MUNDEN STREET (LED)	Avonmore and Brook Green	Steel
ORBAIN ROAD	Munster	Steel
OXBERRY AVENUE	Munster	Steel
PALACE MEWS (LED)	Fulham Broadway	Steel
PELLANT ROAD	Munster/ Fulham Broadway	Steel
PERCY ROAD	Askew	Steel
PERRERS ROAD	Ravenscourt Park	Steel
PROTHERO ROAD	Fulham Broadway	Steel
PURCELL CRESCENT	Fulham Reach	Steel
REPORTON ROAD	Munster	Steel
RINGMER AVENUE	Munster	Steel
ROSALINE ROAD	Munster	Steel
ROWALLAN ROAD	Munster	Steel
SATLER STREET (LED)	College Park and Old Oak	Steel
SHERBROOKE ROAD	Munster/ Fulham Broadway	Steel
SOUTHCOMBE STREET (LED)	Avonmore and Brook Green	Steel
ST ALBANS TERRACE	Fulham Reach	Steel
ST OLAFS ROAD	Munster	Steel
TOURNAY ROAD	Fulham Broadway	Steel
VERNON STREET (Lanterns Only) (LED)	Avonmore and Brook Green	Steel
VARNA ROAD	Munster	Steel
VERA ROAD	Munster	Steel
WALDEMAR AVENUE	Munster	Steel
WALDO ROAD	College Park and Old Oak	Steel
WESTVILLE ROAD	Askew	Steel

Based on column age we expect that the street lights on the roads below will need to be replaced within the next 5 years.

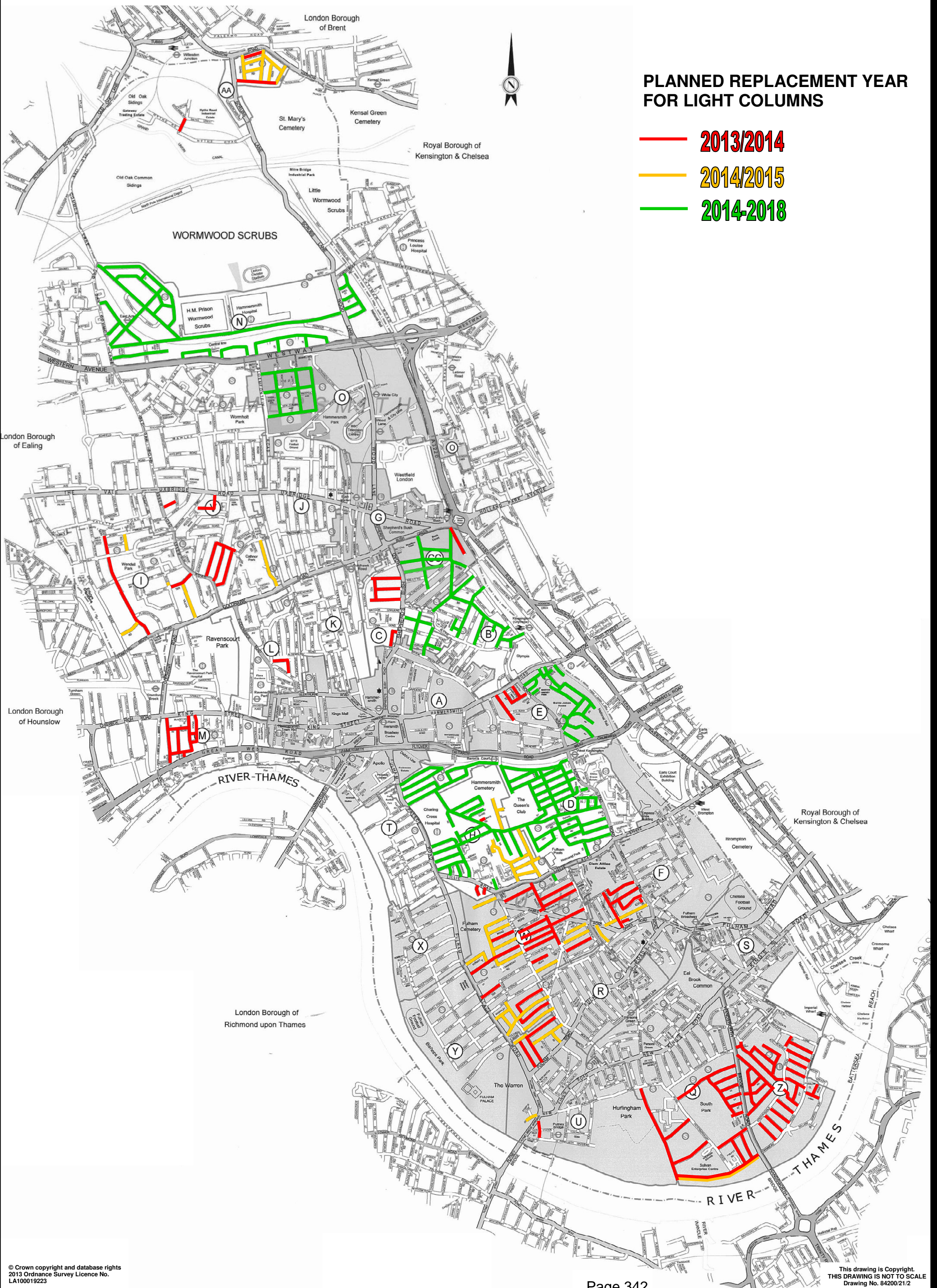
The replacement programme for each year will be finalised once we have received the results of structural testing that is undertaken. The structural testing will tell us what the remaining life of the street lights is and therefore how soon they need to be replaced.

NAME	Ward	Existing Column Type
2014-2015		
ABBEY GARDENS	Fulham Reach	Steel
ALLESTREE ROAD	Munster	Steel
ASHCHURCH PARK VILLAS	Ravenscourt Park	Steel
ATLANTA STREET	Munster	Concrete
BRANKSEA STREET	Munster	Steel
BRECON ROAD	Fulham Reach	Concrete
BRONSART ROAD	Munster	Concrete
BURNFOOT AVENUE	Munster	Concrete
CARNWATH ROAD	Sands End	Steel
CATHNOR ROAD	Askew	Steel
CHURCH GATE	Palace Riverside	Steel
COLEHILL LANE	Munster	Concrete
CRAMMOND CLOSE	Fulham Reach	Concrete
CRAMFORD ROAD	Fulham Reach	Steel
DIURELL ROAD	Munster	Concrete
EDGARLEY TERRACE	Munster	Concrete
FERNHURST ROAD	Munster	Concrete
FIELD ROAD	Fulham Reach	Steel
FIRTH GARDENS	Munster	Concrete
GIROUDE ROAD	Fulham Broadway	Concrete
HESTERCOMBE AVENUE	Munster	Concrete
HOLBERTON GARDENS	College Park & Old Oak	Steel
HUMBOLT ROAD	Fulham Reach	Concrete
KENMONT GARDENS	College Park & Old Oak	Steel
KIMBELL GARDENS	Munster	Concrete
LALOR STREET	Munster	Concrete
LETCHFORD GARDENS	College Park & Old Oak	Steel
MABLETHORPE ROAD	Munster	Concrete
MOYLAN ROAD	Fulham Reach	Concrete
MUSARD ROAD	Fulham Reach	Steel
NORFOLK TERRACE	North End	Steel
PALGRAVE ROAD	Ravenscourt Park	Steel
PARKVILLE ROAD	Munster	Concrete
PONSARD ROAD LC2-LC7	College Park & Old Oak	Steel
RIGELEY ROAD	College Park & Old Oak	Steel
ROSAVILLE ROAD	Munster	Concrete
SHORROLD ROAD	Fulham Broadway	Concrete
STRODE ROAD	Munster	Concrete
STRONSA ROAD	Askew	Steel
TITMUS STREET	Shephard's Bush Green	Steel
TRENMAR GARDENS	College Park & Old Oak	Steel
VALLIERE ROAD	College Park & Old Oak	Steel
WYFOLD ROAD	Munster	Concrete

NAME	Ward	Existing Column Type
2014-2018		
ADDISON BRIDGE PLACE	Avonmore & Brook Green	Steel
APPLEGARTH ROAD	Addison	Steel
ARCHER ROAD	North End	Steel
AUGUSTINE ROAD	Addison	Steel
AUSTRALIA ROAD	Wormholt & White City	Steel
AVONMORE PLACE	Avonmore & Brook Green	Steel
AVONMORE ROAD	Avonmore & Brook Green	Steel
BARB MEWS	Addison	Concrete
BAYONNE ROAD	Fulham Reach	Steel
BEAGONSFIELD TERRACE ROAD	Avonmore & Brook Green	Steel
BENTWORTH ROAD	College Park & Old Oak	Steel
BERYL ROAD	Fulham Reach	Steel
BISCOY ROAD	Hammersmith Broadway	Steel
BISHOP KING'S ROAD	Avonmore & Brook Green	Steel
BOLINGBROKE ROAD	Addison	Steel
BRAMBER ROAD	North End	Steel
BRAYBROOK STREET	College Park & Old Oak	Steel
BUTE GARDENS	Hammersmith Broadway	Steel
CANADA WAY	Wormholt & White City	Steel
CAVERSWALL STREET	College Park & Old Oak	Steel
CEYLON ROAD	Avonmore & Brook Green	Steel
CHARGROFT WAY	Addison	Steel
CHESSON ROAD	North End	Steel
COMMONWEALTH AVENUE	Wormholt & White City	Steel
CUMBERLAND CRESCENT	Avonmore & Brook Green	Steel
DEWHURST ROAD	Addison	Steel
DU CANE ROAD	College Park & Old Oak	Steel
DUNSANY ROAD	Addison	Steel
EARSBY STREET	Avonmore & Brook Green	Steel
EDITH VILLAS	Avonmore & Brook Green	Steel
ERCONWALD STREET	College Park & Old Oak	Steel
EYNHAM ROAD	College Park & Old Oak	Steel
FITZNEAL STREET	College Park & Old Oak	Steel
FOLIOT STREET	College Park & Old Oak	Steel
GLENROY STREET	College Park & Old Oak	Steel
GORLESTON STREET	Avonmore & Brook Green	Steel
GRATTON ROAD	Avonmore & Brook Green	Steel
GREYHOUND ROAD	Fulham Reach	Steel
HAZLITT ROAD	Avonmore & Brook Green	Steel
HEATHSTAN ROAD	College Park & Old Oak	Steel
INDIA WAY	Wormholt & White City	Steel
KINNOUL ROAD	Fulham Reach	Concrete
LISGAR TERRACE	Avonmore & Brook Green	Steel
LUXEMBURG GARDENS	Avonmore & Brook Green	Steel
MACLISE ROAD	Avonmore & Brook Green	Steel
MARGRAVINE GARDENS	Fulham Reach	Steel
MARGRAVINE ROAD	Fulham Reach	Steel
MASBRO ROAD	Addison	Steel
MATHESON ROAD	Avonmore & Brook Green	Steel
MAURICE STREET	College Park & Old Oak	Steel
MELLITUS STREET	College Park & Old Oak	Steel
MILSON ROAD	Addison	Steel
MINFORD GARDENS	Addison	Steel
MORNINGTON AVENUE	Avonmore & Brook Green	Steel
NASCOT STREET	College Park & Old Oak	Steel
NORBROKE STREET	College Park & Old Oak	Steel
NORMAND ROAD	North End	Steel
NORTH END CRESCENT	Avonmore & Brook Green	Steel
OSMUND STREET	College Park & Old Oak	Steel
PRIMULA STREET	College Park & Old Oak	Steel
QUEEN'S CLUB GARDENS	North End	Steel
RICHMOND WAY	Addison	Steel
ROCKLEY ROAD	Addison	Steel
ROWALLAN ROAD	Munster	Concrete
RYLETT ROAD	Ravenscourt Park	Steel
SCOTT'S ROAD LC1-8	Shephard's Bush Green	Steel
SHINFIELD STREET	College Park & Old Oak	Steel
SINCLAIR GARDENS	Addison	Steel
SPEICER MEWS	Fulham Reach	Steel
SPRING VALE TERRACE	Addison	Steel
ST DUNSTON'S ROAD	Fulham Reach	Steel
STANWICK ROAD	Avonmore & Brook Green	Steel
STOKESLEY STREET	College Park & Old Oak	Steel
STONOR ROAD	Avonmore & Brook Green	Steel
TASSO ROAD	Fulham Reach	Concrete
TERRICK STREET	College Park & Old Oak	Steel
TURNVILLE ROAD	North End	Steel
UNSWICK GARDENS	Addison	Steel
WULFSTAN STREET	College Park & Old Oak	Steel
YELDHAM ROAD	Hammersmith Broadway	Steel

STREET LIGHTING REPLACEMENT PROGRAMME — 2013 to 2018

LONDON BOROUGH OF HAMMERSMITH & FULHAM



APPENDIX 3 : STREET LIGHTING PROGRAMME

Street Lighting Column Replacements

When do we decide to replace street lighting columns?

- 1.1. We use the capital street lighting replacement budget to systematically replace light columns that have reached the end of their life expectancy — normally 25-30 years, or have failed structural tests. Where all columns on a road have a residual life of less than 3 years, all of the columns on the road are replaced as this is more cost effective and efficient. The forward Capital Street Lighting Replacement Programme is attached in Appendix 1.
- 1.2. Replacement of columns is prioritised based on column condition, which is determined from structural testing and inspections. Each year's replacement programme will be confirmed following results from structural testing.
- 1.3. If a road being relit has any columns that are in good condition we will just replace the lantern on those columns.

Choice of New Lighting

- 1.4. New lighting adheres with to our Streetsmart guidance to ensure that the lighting installed across the borough is consistent.
- 1.5. When replacing lighting, we use new technologies that reduce ongoing maintenance costs, carbon emissions and energy costs.
- 1.6. All new lighting is white light, in line with Council policy. White light has been the Council's preferred light source since 2007. White light lamps use less energy than the High Pressure Sodium lamps (orange/yellow light) historically used in the borough. A newer white light source, LED (Lighting Emitting Diode), has been introduced in the borough this year on selected Highway roads and in Housing sites.
- 1.7. The most appropriate light source is chosen for each location based on the design characteristics of the road, the capital cost, energy efficiency, carbon reduction; and maintenance requirements of the light.


The Maintenance work programme

- 1.8. Maintenance of the network consists of planned cyclical work and reactive work. Reactive work is generated in response to faults and damage to assets
- 1.9. We programme cyclical maintenance works to maintain the assets in good condition and fulfil our duty of care. Such activities include:
 - Group lamp replacement on a four to six year programme depending on lamp type

- Electrical inspections and testing on a six year rolling programme
 - Structural inspections and testing. We test columns after ten years in place, then every six years and rate them as Red, Amber, and Green. Columns rated amber require retesting in three years. Columns rated Red need to be replaced immediately for public safety.
 - Cleaning of asset as part of a programme or on an individual basis for signs and illuminated bollards.
- 1.10. Officers identify faults through a night time inspection regime. All assets are inspected every 10 working days during winter, reducing to 20 days on residential roads during summer, due to the shorter night time hours. Customers also raise queries via the council's web site and by phone. Faults are also identified during general maintenance / inspections by our term contractor and street lighting team.
- 1.11. Repair of faults is prioritised on the type and the nature of the fault. Each defect is raised individually with the contractor, who receives a fixed price to inspect and repair the defect, within a set period of time.
- 1.12. Electricity supply faults are the responsibility of the Distribution Network Operator (DNO). The Street Lighting Team identifies faults and then issues an order to the DNO or approved supplier. This can take six to eight weeks to resolve depending on the type of fault and the repair or connection required.

Public Lighting Energy

- 1.13. Energy supply rates are set by an external body. This means that we have limited ability to influence energy costs. The reduction in the energy budget for 2014/15 is due to energy costs being lower than budgeted for in recent years.
- 1.14. To help fulfil the Council's commitment to reduce carbon emissions (40% from 2009 levels by 2016), we are working to reduce carbon emissions from street lighting. At current investment levels we have reduced our street lighting carbon emissions by 10% below 2009 levels. This has been achieved through the use of new technologies including white light, photocells that reduce the length of time the lights are on for each night, and removing redundant illuminated assets as part of de-cluttering. Other programmes such as changing bollards to solar powered has also assisted in reducing our emissions.
- 1.15. Continuing lantern and technological improvements including LED lanterns, along with changes to the national standards and guidance is assisting in the Council reducing its emissions. Currently we are forecasting 15% carbon reductions by 2016 with existing budgets. Invest to save options may be required to increase this reduction and we are working with the Carbon Management Team to look at the options available.

	<p align="center">London Borough of Hammersmith & Fulham</p> <p align="center">CABINET</p> <p align="center">11 AUGUST 2014</p>	
<p>HOUSING ASBESTOS SURVEYS</p>		
<p>Report of the Cabinet Member for Housing – Councillor Lisa Homan</p>		
<p>Open report</p> <p>A separate report on the open Cabinet agenda provides exempt information in connection with the procurement process.</p>		
<p>Classification - For Decision</p> <p>Key Decision: Yes</p>		
<p>Wards Affected: All</p>		
<p>Accountable Executive Director: Melbourne Barrett – Executive Director of Housing & Regeneration</p>		
<p>Report Author: Ian Watts – Commercial & Contracts Manager</p>	<p>Contact Details: Tel: 020 8753 1848 E-mail: ian.watts@lbhf.gov.uk</p>	

1. EXECUTIVE SUMMARY

- 1.1. This is a re-procurement of an existing contract, with some changes in activity to reflect the arrangements of the new repairs contract with MITIE, and the Property Services re-structure.
- 1.2. The existing contract for asbestos co-ordination and management has reached its full term, and cannot be extended further.
- 1.3. The package of works within the new repairs contract was adjusted to reflect a subtle change of strategic direction within Property Services, such that all direct landlord's duties would be undertaken either in house or with directly managed contracts, with the works arising from such duties being undertaken through the repairs contracts. Thus this contract is simply for Asbestos surveys, sampling and air monitoring, with any works arising from these surveys being undertaken through the repairs contract.

- 1.4. In addition, Schools and Corporate buildings have expressed a desire to be named within the scope of the contract and thus have the ability to avail themselves of the services if such a need arises.

2. RECOMMENDATIONS

- 2.1. That a 5 year contract be awarded to ACEPSI for the provision of asbestos surveys, sampling and air monitoring for Housing Properties (with the potential addition of schools and corporate buildings).
- 2.2. To note that the tendered costs (identified in the exempt report) are in line with budgeted allowances for the financial year 2014/2015.

3. REASONS FOR DECISION

- 3.1. The Control of Asbestos regulations 2012 places a duty to manage asbestos in non-domestic buildings (which for the purposes of the Council's Housing and Regeneration Department) refers to the communal parts of multiple occupancy dwellings).
- 3.2. In addition, the Council has a responsibility under the Landlord and Tenant Act 1985 to ensure that its properties are fit for habitation and to that end has a programme of surveying samples of the housing stock to assess the likelihood of asbestos and asbestos based material being present.

4. INTRODUCTION AND BACKGROUND

- 4.1. The existing contract for asbestos co-ordination and management was due to terminate in January 2014, but has been extended in the interim until the new contract could be awarded.
- 4.2. As part of the re-structuring of Property Services within the Housing and Regeneration Department, the Council sought to carefully delineate between responsibilities which were designated as a Landlord's duty, and any consequential works which could be appropriately instructed to the repairs contractor. Thus, the Council is proposing to bring back in house the responsibility of asbestos co-ordination, and to directly manage a discreet contract for asbestos surveying, sampling and air monitoring. All works arising from these surveys will be undertaken through the recently awarded repairs contract with MITIE.
- 4.3. During the period that the specification was being worked up, discussions with corporate colleagues revealed a desire for these arrangements to be made available on an opt-in basis to 3BM (the Council's employee led Mutual) for asbestos survey work in schools, and this option has been included. Subsequently a request was received to include a further option

as a fall back service for corporate buildings, and this further option has also been introduced.

- 4.4. It should be emphasized that both of these requirements have been introduced on an optional basis, and that the contract remains viable even if only the Housing Regeneration element is instructed.

5. PROPOSAL AND ISSUES

- 5.1. A tender was carried out in accordance with the Public Contracts Regulations 2006 (as amended) using the Open Procedure. The contract notice being sent for publication in the *Official Journal of the European Union* on 7 January 2014. The tender was made available through the London Tenders Portal for return on Tuesday 18 February 2014. This tender return date was extended to 26 February owing to the necessary correction of one of the tender documents.

Tender Selection

- 5.2. A total of twenty-six applicants responded by the revised deadline, and the applications were scored by consensus method. The Tender Appraisal Panel consisting of Charles Hahn (HRD Head of Safety), Sebastian Mazurczak (Asbestos Compliance Manager) and Ian Watts (HRD Commercial & Contracts Manager).
- 5.3 The outcome of the Tender Appraisal Panel's considerations are set out in the exempt report.

6. OPTIONS AND ANALYSIS OF OPTIONS

- 6.1. It is not possible to further extend the existing contract.
- 6.2. It is not possible for the reasons stated in section 3, to cease undertaking the works
- 6.3. The prices, having been competitively tendered, have been reviewed to assess whether they a) afford value for money and b) are sustainable i.e. are not abnormally low (as outlined in Regulation 30 (6) of the Public Contracts Regulations. The prices are adjudged to offer reasonable value for money and therefore it is recommended that this option is in the best interests of the Council.

7. CONSULTATION

- 7.1. There is no requirement to consult, as the cost of any survey to a communal area would fall below the threshold for Section 20 Leaseholder consultation purposes.

- 7.2. An Equalities Impact Assessment has not been undertaken as this service does not have a primary impact on residents and there is no proposed change to the responsive service. The sample surveys of dwellings does not affect residents as it is managed when a property remains void.
- 7.3. The process for any requirement for urgent asbestos survey during a simple response repair has not been changed.

8. EQUALITY IMPLICATIONS

- 8.1. A full Equalities Impact Assessment has not been undertaken as this service does not have a primary impact on residents. The sample surveys of dwellings is managed when a property becomes void.
- 8.2. The process for any requirement for urgent asbestos survey during a simple response repair has not been changed.

9. LEGAL IMPLICATIONS

- 9.1. The proposed award of the Service Contract has been carried out in the compliance of the Council's Contract Standing Orders and the Public Contracts Regulations. Accordingly the Bi-borough Director of Law endorses the recommendations in this report.
- 9.2. Legal Services will be available to assist the client department with preparing and completing the necessary contract documentation.
- 9.3. Implications completed by: Kar-Yee Chan, Solicitor (Contracts), 020 8753 2772

10. FINANCIAL AND RESOURCES IMPLICATIONS

- 10.1 The financial standing of ACEPSI has been examined and the Council has been advised that in the light of the information available, the overall performance of the company is considered to be sound.
- 10.2 The overall spend on the contract will be controlled on a commitment basis and monitored through the department's monthly monitoring regime in order to ensure that the final outturn each year does not exceed the budget provision.
- 10.3 Cost control will be supported by robust contract management arrangements which will ensure that value for money promised under the tendering process is maintained throughout the life of the contract.
- 10.4 The budget of £75,000 is held on the following cost code within the Housing Revenue Account: 12376 MRP512.

10.5 Implications verified/completed by: (Danny Rochford, Head of Finance, 020 8753 4023).

11. RISK MANAGEMENT

11.1. These proposals do not reflect any change to the Council's policies, they replicate existing arrangements and the proposals have been prepared in conjunction with advice from Health & Safety Advisors (Head of Safety for HRD, and the corporate Asbestos Advisor)

11.2. Implications verified/completed by: (Michael Sloniowski, BiBorough Risk Manager 0208 753 2587)

12. PROCUREMENT AND IT STRATEGY IMPLICATIONS

12.1. It is noted that the overall spend on the contract will be controlled on a commitment basis and monitored through the department's monthly monitoring regime in order to ensure that the final outturn each year does not exceed the budget provision.


12.2. The tender was carried out in accordance with the Public Contracts Regulations 2006 (as amended) using the Open Procedure and is in accordance with the Council's Contract Standing Orders.

12.3. Implications verified/completed by: (Robert Hillman, Procurement Consultant x1538)

LOCAL GOVERNMENT ACT 2000 **LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT**

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
1.	Tender documents (exempt)	Ian Watts x. 3064	Housing & Regeneration

Agenda Item 7

	London Borough of Hammersmith & Fulham CABINET 11 AUGUST 2014
PARKING ENFORCEMENT ON HRA LAND	
Report of the Cabinet Member for Housing, Councillor Lisa Homan	
Open Report A separate report on the exempt Cabinet agenda provides exempt information about the procurement process and recommends acceptance of a tender.	
Classification: For noting Key Decision: Yes	
Wards Affected: All	
Accountable Executive Directors: Melbourne Barrett – Executive Director of Housing & Regeneration; Nigel Pallace – Bi-borough Director of Transport and Technical Services	
Report Author: Wendy Reade Project Manager Housing and Regeneration and Naveed Ahmed Parking Project and Policy Manager Transport and Technical Services	Contact Details: Tel: 020 753 4375 Email: wendy.reade@lbhf.gov.uk Email: naveed.ahmed@lbhf.gov.uk

1. EXECUTIVE SUMMARY

- 1.1 Parking control arrangements were terminated on 1 October 2012 due to changes in regulations for parking enforcement on private land. New arrangements are therefore required which comply with the revised regulations and two principle options are available to the Council as landlord. Whilst longer term options continue to be explored it is proposed to put in place interim arrangements for parking control through a newly tendered contract. This report seeks approval to let a contract to undertake parking enforcement on HRA land.
- 1.2 The Contractor will be responsible on designated housing estates for patrolling estates for the purpose of enforcement parking controls and issuing Parking Charge Notices to deal with unauthorised or illegally parked cars and collecting fines. They will also be responsible for issuing permits and visitor scratch cards.
- 1.3 Two previous reports have been presented to Cabinet on 24 June 2013 and 6 January 2014. The report of 23 June 2013 summarised the changes in legislation, options available to the Council and the outcomes from the resident consultation exercise. It recommended and Cabinet approved for residents to pay a flat fee annual charge to park on HRA housing estates.

- 1.4 The report of 6 January 2014 sought approval to appoint consultants, overseen by the Parking Projects and Policy Manager in Transport and Technical Services, to undertake a review of the longer-term options available and gained approval to the commencement of an interim parking management contract. Furthermore it delegated authority to the Executive Director of Housing and Regeneration (HRD), and the Executive Director of Transport and Technical Services (TTS) to award an interim contract. This report also outlined the options, issues and recommendations for the management of garages on Council estates. Further progress and recommendations concerning the garages will be presented to Cabinet separately at a later date.

2. RECOMMENDATION

- 2.1. That the report be noted.

3. REASONS FOR DECISION

- 3.1 The report to Cabinet dated 24 June 2013 confirmed that the contract to manage parking on HRA estates was terminated on 1 October 2012, as a result of legislative changes. Since then there has been no parking enforcement on HRA land which is causing inconvenience for residents who have a permit to park on their estate. A total of 143 residents have terminated their licences, representing 11% of the total car parking spaces that were let at 1 October 2010, at an estimated loss of rental income to the HRA of circa £20,000 a year.
- 3.2 The separate exempt tender acceptance report is submitted for Cabinet Member approval in accordance with paragraph 12.5.1 of Contract Standing Orders, which states that contract award decisions are delegated to the relevant Cabinet Member(s) where the scheme's value is £100,000 or more but less than £1,000,000, providing the proposed scheme has been previously approved by Cabinet as a Key Decision.

4. INTRODUCTION AND BACKGROUND

- 4.1. The introduction of the Protection of Freedom Act (POFA) in October 2012 resulted in a limitation to the Housing & Regeneration Department's (HRD) contractors' ability to enforce parking controls on housing estates because it became unlawful to tow or clamp vehicles parked without authorisation on private land. As a result, HRD's enforcement contract was terminated at this time.
- 4.2. Cabinet agreed on 6 January 2014 that a full appraisal of the best options for the longer-term parking enforcement on each HRA housing estate should be undertaken and Cabinet approved the appointment of consultants through Transport and Technical Services. TTS were commissioned in the sum of £176,000 and the specification for the work they are carrying out is attached at Appendix 1.
- 4.3. There are broadly two key options for parking enforcement on our estates as follows:
 - 4.3.1. Parking enforced by a private contractor through Parking Charge Notices;
and

- 4.3.2. Parking enforced by our own Parking Services through Penalty Charge Notices (PCNs) which requires Traffic Management Orders (TMOs).
- 4.4. Advice from the London Councils is that the best option to enforce parking on HRA housing estates is through TMOs, as the Council has the lawful authority to collect PCN fines from the registered keeper of the vehicle and they are easy to enforce with the ability to obtain court warrants and cost recovery through bailiff action if necessary. Because of the minimum timescale of 18 months to assess the layout of each of the 91 housing estates; whether TMOs are the best option; and to put them in place, interim arrangements are required to manage parking during this period. Cabinet agreed on 6 January 2014 that an interim parking enforcement contract should be procured whilst the review is carried out. This report presents the outcome of the procurement exercise that has been undertaken to appoint an interim parking management contractor and recommends the appointment of Parking Enforcement Agency (PEA) on terms set out in the exempt report.
- 4.5. The report to Cabinet on 6 January 2014 advised members that the full analysis of the options, likely costs and the consultant's report would be presented to Cabinet at a later date. It also advised that it would take 18 months to implement the first tranche of estates where a TMO was recommended.
- 4.6. Work on the long term solution to assess the 91 sites with parking or where enforcement is required (as set out in Appendix 2), has started and initial site visits will have been completed before the end of September 2014. A report will be presented to Cabinet in April 2015 with the findings and costing for the long term solution. The timing of this Cabinet report is aligned to the Department of Transport changes to the Traffic Signs Regulations and General Directions (TSRGD) 2002, that come into effect in March 2015. These changes could have a major impact on reducing the cost of implementing TMOs.
- 4.7. The interim parking enforcement contract that is recommended within this report, will commence at the end of September 2014 across all estates and will operate for a contract period of 2 years, with an option to extend for a further year. The proposed interim contract allows for estates to be removed from the contract with a short period of notice, to establish alternative arrangements such as a TMO. This enables alternative arrangements to be phased in during the interim contract period.

5. PROPOSAL AND ISSUES

5.1. Proposed Contract

- 5.1.1. The interim management contract will operate across designated HRA housing estates and will commence at the end of September 2014 and will operate for a period of 2 years with the option to extend for a further year. The contractor will be responsible for:

- Patrolling estates for the purpose of enforcement parking controls
- Responding to requests to deal with unauthorised or illegally parked cars
- Issuing and processing of Parking Charge Notices
- Printing permits and visitor scratch cards and vouchers
- Taking payment and issuing permits and visitor scratch cards/vouchers
- Initial appeals against Parking Charge Notices
- Refunds for parking permits

- Complaints and enquiries relating to the Service
- Replacement of damaged signs
- Reporting damage to lines or gates.

5.1.2 As outlined above, the contract is anticipated to 'go live' at the end of September 2014, with active patrols on the designated HRA estates enforcing the car parking restrictions. Residents will be made aware of the new arrangements and the active enforcement of car parking permits and visitor vouchers. There will no doubt be some positive and negative feedback concerning the enforcement of the restrictions, but overall, residents should have access to more parking availability as a result of the new interim management arrangements and unauthorised parking will be addressed.

6. CONSULTATION

- 6.1. The Cabinet report of 24 June 2013 presented the results of the resident consultation exercise on potential parking management options. 15,040 letters were sent as part of the consultation exercise and 635 (4.2%) responses were received. Cabinet approved for residents to be charged a flat fee annual charge to park on HRA housing estates.
- 6.2. Following completion of the TTS surveys and its option appraisal of each estate, HRD will undertake consultation with all stakeholders to ensure the most suitable outcome for each estate. This will include any recognised Tenant and Resident Associations and the individual residents.

7. EQUALITY IMPLICATIONS

- 7.1. Cabinet considered the equality implications in the same report of 24 June 2013.

8. LEGAL IMPLICATIONS

- 8.1. The legal implications are described in this report.
- 8.2. Implications verified/completed by: Andre Jaskowiak, Senior Solicitor (Contracts) telephone 020 7361 2756.

9. FINANCIAL AND RESOURCES IMPLICATIONS

- 9.1 The approved budget for 2014/15 within the Housing Revenue Account (HRA) is for net income to be generated from parking activities of (£70k). This is offset by budgeted expenditure of £176k relating to the cost of an external review to ascertain the most appropriate option for parking control.
- 9.2 The current forecast for income in 2014/15 from parking licences indicate that the (£70k) income target will not be achieved this year, and an under-recovery of £5k is predicted. This is due to an ongoing decline in the number of licences being renewed as a result of the absence of parking enforcement on HRA land.
- 9.3 The following table sets out the expected net additional revenue (income)/expenditure to be generated from the implementation of the interim

parking management contract. There will be a part-year effect in 2014/15 with a full year effect in 2015/16.

HRA Financial Revenue Impact of Interim Contract for Parking Enforcement				
	14/15 Part Year		15/16 Full Year	
	Lower Limit	Upper limit	Lower Limit	Upper limit
	£000s	£000s	£000s	£000s
Fines	(105)	(140)	(211)	(281)
Parking Permits	(67)	(147)	(158)	(452)
Visitor Vouchers	(7)	(10)	(13)	(19)
Income	(179)	(297)	(382)	(752)
One-off infrastructure costs	75	200	50	400
Ongoing maintenance costs	0	0	100	100
Operational costs	75	75	150	150
Expenditure	150	275	300	650
Net (Income)/Expenditure	(29)	(22)	(82)	(102)
Net Income to Sep 14	(33)	(33)		
Budget	(70)	(70)	(70)	(70)
Variance	8	16	(12)	(32)

- 9.4 The table includes a number of assumptions regarding the activity levels expected under the new interim arrangements and accordingly includes lower and upper limits in accordance with this approach. Key assumptions include annual permits costing £119 per annum and this is based on a consultation letter issued in December 2012 and reported upon at Cabinet on 24 June 2013. It also includes the first tranche of improvements work to allow for enforcement. The programme of spend to improve estate lining will be brought forward should the higher levels of income be realised; this will allow service users to see the improvements faster and ensure the balancing of parking income with expenditure. There is a risk that the upper and lower limits in terms of financial implications could be exceeded. However, activity levels will be closely reviewed as part of robust client and internal monitoring arrangements and will be reported on via the Council's monthly monitoring regime.
- 9.5 It is noted that the budgeted expenditure of £176k for the review of long term parking enforcement options for each estate is expected to be fully spent in 2014/15. Any additional costs that may arise will be closely monitored and will be covered by income from the enforcement contract. A further report will be presented to Cabinet following completion of the review (expected in April 2015), this will include full consideration of the financial implications of the proposed options.
- 9.6 Implications verified/completed by: Danny Rochford, Head of Finance, HRD, 0208 753 4023.

10. RISK MANAGEMENT

- 10.1. The department is responsible and accountable for identification, recording, evaluation and management of procurement risk associated with the procurement. As the report recommendation is to approve the tender from Parking Enforcement Agency Ltd there are no further risk management implications other than ensuring a successful implementation post award of the contract.
- 10.2. Implications verified/completed by Michael Sloniowski, Principle Consultant Risk Management 0208 753 2587.

11. PROCUREMENT AND IT STRATEGY IMPLICATIONS

- 11.1. The Contract has been tendered in accordance with the Council's Contract Standing Orders, using the London Procurement Portal. Accordingly, the Director supports the recommendations contained in the report.
- 11.2. In accordance with CSO 12.5.1, the Cabinet member may award this contract.
- 11.3. Implications verified/completed by: (Robert Hillman, Procurement Consultant, x1538).

LOCAL GOVERNMENT ACT 2000 LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
1.	Procurement & Project documents (exempt)	Wendy Reade Ext: 4375	Housing & Regeneration 3rd Floor, HTH Ext Hammersmith W6 9JU
2.	Project Development	Wendy Reade Ext: 4375	Housing & Regeneration 3 rd Floor, HTH Ext Hammersmith W6 9JU

- LIST OF APPENDICES:** (1) TTS Specification for surveys
(2) List Of estates included in the TTS parking survey

Appendix 1: Specification for surveys and timescales TTS consultant

Action	Timescales
Begin initial site visits and background research 1/5/14	1-2 months
Identify all works required to allow HRD to implement interim parking enforcement contract and arrange works following HRD approval	2-3 months
Conduct details reviews into existing legislation. Examine planning conditions/applications and conflicts of interest with any proposed schemes. - Checking records for private land	1-2 months
Compile data and site visits. Report on findings to HRD following visit to each site	1-2 weeks
Formulate recommendations. Begin the initial review of estates based on survey data, information from residents/stakeholders and other sources , draft proposed options for each Estate based on information	Each batch 2-3 months
Draft a report for Cabinet based on recommended long term parking enforcement proposals for each estates with timescales and costs and seek approval	1 month + lead in period
Upon approval of recommendations - begin the design of for each estate this requires stats and utility surveys <ul style="list-style-type: none"> • produce detailed designs of each estate identify road and off street locations • identify sign and potential sign locations • identify lining conditions • prepare lining/signing spec options Discuss DfT designs intent to use signs and get DfT approval	2 months to produce 2-3 estate designs
Upon approval of designs - implement designs and organising contractors - Including the creation of TMOs - Checking physical site works	Minimum 3-6 months

Appendix 2: List of 91 HRA Housing Sites

Ward	Estate	No. Properties	Current parking capacity
Ward 1	Wood Lane	140	45
	Rosewood Sq.	28	0
	Woodman Mews	54	29
Ward 2	Askham Court	56	3
	Lugard House	31	4
	Wengham, Hayter & Orwell	52	0
	Wormholt	316	2
Ward 3	Edward Woods Estate	754	132
	Frithville Gardens	54	3
	William Church Estate	116	64
	Aldine Court	49	0
	Clifton House Uxbridge Road	30	0
	Ward 4	Emyln Gardens	246
	Kelmscott Gardens	82	39
	Becklow Gardens	245	46
	Malvern & Landor Ct	62	7
	Hayden Park Road 67-106	35	14
	94-108 Coningham & Stowe Road 70-100	35	10
	128-158 Coningham	12	8
	The Grange Goldhawk Road	36	
Ward 5	Flora Gardens	197	48
	Ashchurch Park Villas	18	5
	Marryat Court	38	5
	Standish House	51	19
	Cardross House	11	0

	Mylne Close	18	9
Ward 6	Aspen Gardens	116	29
	Queen Caroline Estate	268	73
	Riverside Gardens	219	83
	Banim St	35	4
	Verulum	56	0
	Benbow Court	20	0
Ward 7	Sulgrave Gardens	48	3
	Netherwood Road	33	14
Ward 8	Lytton Estate	295	26
	Planetree Court	31	8
	Munden	30	6
	Waterhouse Cl.	41	10
	Linacre Court	69	28
	24-26 Matheson Road	6	3
	Springvale Estate	214	24
Ward 9	Bavonne Estate (Brecon)	409	66
	Magravine Estate	394	82
	Kier Hardy House	42	8
	Wentworth Court	40	6
Ward 10	Maystar Estate and Cheeseman Terrace	287	92
	Alice Gilliat House	77	24
	Vereker Rd 50	26	3
	West Kensington	587	115
	Gibbs Green	98	48
	Browning Court 53, Turnville Rd	30	5
Ward 11	Robert Owen House	102	34
	Adam Walk & Crabtree Lane	32	4

	Stevenage Road	81	27
	Swanbank Court	34	6
	Eternit Walk, Cedar Lodge,	81	27
	Meadowbank Close	98	20
	Rowberry Close	31	8
	Wheatsheaf Lane 1-27	27	4
Ward 12	Aintree Estate	203	55
	St Peters Terrace	54	10
	Wyfold Road	36	14
Ward 13	Clem Atlee	672	274
	Seagrave Road & Viking Ct	75	8
	Farm Lane	29	11
Ward 14	Arthur Henderson House	60	24
	William Banfield House	70	0
	Barclay Close	105	60
	Lancaster Court,	226	94
	Fulham Court	356	120
	Barclay Road	106	4
	Laurelbank Gdns	22	5
	Burlington Place	20	7
	Burnfoot Avenue 30	12	12
	Burnfoot Avenue 39-49	6	4
	Ethel Rankin Court	38	10
	Bearcroft House	30	5
Ward 15	43-47 Peterborough Road	18	8
	Dan Leno Walk	12	9
	Eric Macdonald House	12	8
	Richard Knight House	8	8
	Manor Court Bagleys Lane	60	4
	Broxholme House	74	10
	Stanford Court	31	6
	Walham Green	120	93

Ward 16	Carnwath House	27	16
	Townmead Estate, Barton House	76	61
	Sullivan Court	480	121
	John Dwight House	8	8
	Philpot Square	84	38
	Bulow Estate inc Pearscroft court & Jepson House	166	52

NOTICE OF CONSIDERATION OF A KEY DECISION

In accordance with paragraph 9 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the Cabinet hereby gives notice of Key Decisions which it intends to consider at its next meeting and at future meetings. The list may change between the date of publication of this list and the date of future Cabinet meetings.

NOTICE OF THE INTENTION TO CONDUCT BUSINESS IN PRIVATE

The Cabinet also hereby gives notice in accordance with paragraph 5 of the above Regulations that it intends to meet in private after its public meeting to consider Key Decisions which may contain confidential or exempt information. The private meeting of the Cabinet is open only to Members of the Cabinet, other Councillors and Council officers.

Reports relating to key decisions which the Cabinet will take at its private meeting are indicated in the list of Key Decisions below, with the reasons for the decision being made in private. Any person is able to make representations to the Cabinet if he/she believes the decision should instead be made in the public Cabinet meeting. If you want to make such representations, please e-mail Katia Richardson on katia.richardson@lbhf.gov.uk. You will then be sent a response in reply to your representations. Both your representations and the Executive's response will be published on the Council's website at least 5 working days before the Cabinet meeting.

KEY DECISIONS PROPOSED TO BE MADE BY CABINET ON 11 AUGUST 2014 AND AT FUTURE CABINET MEETINGS UNTIL JANUARY 2015

The following is a list of Key Decisions which the Authority proposes to take at the above Cabinet meeting and future meetings. The list may change over the next few weeks. A further notice will be published no less than 5 working days before the date of the Cabinet meeting showing the final list of Key Decisions to be considered at that meeting.

KEY DECISIONS are those which are likely to result in one or more of the following:

- Any expenditure or savings which are significant (ie. in excess of £100,000) in relation to the Council's budget for the service function to which the decision relates;
- Anything affecting communities living or working in an area comprising two or more wards in the borough;
- Anything significantly affecting communities within one ward (where practicable);
- Anything affecting the budget and policy framework set by the Council.

The Key Decisions List will be updated and published on the Council's website on a monthly basis.

NB: Key Decisions will generally be taken by the Executive at the Cabinet.

*If you have any queries on this Key Decisions List, please contact
Katia Richardson on 020 8753 2368 or by e-mail to katia.richardson@lbhf.gov.uk*

Access to Cabinet reports and other relevant documents

Reports and documents relevant to matters to be considered at the Cabinet's public meeting will be available on the Council's website (www.lbhf.org.uk) a minimum of 5 working days before the meeting. Further information, and other relevant documents as they become available, can be obtained from the contact officer shown in column 4 of the list below.

Decisions

All decisions taken by Cabinet may be implemented 5 working days after the relevant Cabinet meeting, unless called in by Councillors.

Making your Views Heard

You can comment on any of the items in this list by contacting the officer shown in column 4. You can also submit a deputation to the Cabinet. Full details of how to do this (and the date by which a deputation must be submitted) will be shown in the Cabinet agenda.

LONDON BOROUGH OF HAMMERSMITH & FULHAM: CABINET 2014/15

Leader:	Councillor Stephen Cowan
Deputy Leader:	Councillor Michael Cartwright
Cabinet Member for Children and Education:	Councillor Sue Macmillan
Cabinet Member for Economic Development and Regeneration:	Councillor Andrew Jones
Cabinet Member for Finance:	Councillor Max Schmid
Cabinet Member for Health and Adult Social Care:	Councillor Vivienne Lukey
Cabinet Member for Housing:	Councillor Lisa Homan
Cabinet Member for Social Inclusion:	Councillor Sue Fennimore
Cabinet Member for Environment, Transport & Residents Services:	Councillor Wesley Harcourt

Key Decisions List No. 22 (published 11 July 2014)

KEY DECISIONS LIST - CABINET ON 11 AUGUST 2014

The list also includes decisions proposed to be made by future Cabinet meetings

Where column 3 shows a report as EXEMPT, the report for this proposed decision will be considered at the private Cabinet meeting. Anybody may make representations to the Cabinet to the effect that the report should be considered at the open Cabinet meeting (see above).

* All these decisions may be called in by Councillors; If a decision is called in, it will not be capable of implementation until a final decision is made.

Decision to be Made by (Cabinet or Council)	Date of Decision-Making Meeting and Reason	Proposed Key Decision Most decisions are made in public unless indicated below, with the reasons for the decision being made in private.	Lead Executive Councillor(s), Wards Affected, and officer to contact for further information or relevant documents	Documents to be submitted to Cabinet <i>(other relevant documents may be submitted)</i>
August				
Cabinet	11 Aug 2014	<p>Housing Asbestos Surveys</p> <p>Re-tender of contract for Housing Asbestos Surveys, Sampling & Monitoring.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	Cabinet Member for Housing	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Affects 2 or more wards		Ward(s): All Wards	
		Contact officer: Stephen Kirrage Tel: 020 8753 6374 stephen.kirrage@lbhf.gov.uk		
Cabinet	11 Aug 2014	<p>Street Lighting Programme</p> <p>Seeking approval for the 2014/15 planned capital street light column replacement programme, and maintenance work on highway assets.</p>	Cabinet Member for Environment, Transport & Residents Services	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	
		Contact officer: Ian Hawthorn Tel: 020 8753 3058 ian.hawthorn@lbhf.gov.uk		

Decision to be Made by (Cabinet or Council)	Date of Decision-Making Meeting and Reason	Proposed Key Decision Most decisions are made in public unless indicated below, with the reasons for the decision being made in private.	Lead Executive Councillor(s), Wards Affected, and officer to contact for further information or relevant documents	Documents to be submitted to Cabinet (<i>other relevant documents may be submitted</i>)
Cabinet	11 Aug 2014 Reason: Affects 2 or more wards	<p>Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS) consultation</p> <p>CIL is a tool to help fund infrastructure to support development and will be charged on most new development schemes that create net additional floorspace, subject to a number of exemptions and reliefs. Once established, CIL will run alongside Section 106 agreements (S106s) which will continue to operate where it is necessary to make developments acceptable.</p> <p>The CIL DCS consultation is the 2nd stage of public consultation in the process that will lead to the introduction of CIL charges. The 1st public consultation stage took place in September 2012. Consultation is proposed for 9 weeks from July to September 2014.</p>	<p>Cabinet Member for Environment, Transport & Residents Services</p> <p>Ward(s): All Wards</p> <p>Contact officer: Rob Kryszowski rob.kryszowski@lbhf.gov.uk</p>	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	11 Aug 2014 Reason: Expenditure more than £100,000	<p>Planning Income Projects</p> <p>Seeking authority to implement paid for services provided by Development Management</p>	<p>Cabinet Member for Environment, Transport & Residents Services</p> <p>Ward(s): All Wards</p> <p>Contact officer: Peter Kemp Tel: 020 8753 6970 Peter.Kemp@lbhf.gov.uk</p>	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	11 Aug 2014 Reason: Affects 2 or more wards	<p>Parking Enforcement on HRA Land</p> <p>To get agreement on the contract award for an interim parking enforcement contract on HRA land</p> <p>PART OPEN</p> <p>PART PRIVATE</p> <p>Part of this report is exempt from disclosure on the grounds that it contains information relating to the</p>	<p>Cabinet Member for Housing</p> <p>Ward(s): All Wards</p> <p>Contact officer: Wendy Reade Tel: 020 8753 4375 wendy.ream@lbhf.gov.uk</p>	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

Decision to be Made by (Cabinet or Council)	Date of Decision-Making Meeting and Reason	Proposed Key Decision Most decisions are made in public unless indicated below, with the reasons for the decision being made in private.	Lead Executive Councillor(s), Wards Affected, and officer to contact for further information or relevant documents	Documents to be submitted to Cabinet (<i>other relevant documents may be submitted</i>)
		financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.		
Cabinet	11 Aug 2014	Income Recovery Service Level Agreement The proposal is that the responsibility and direct management of the Income Recovery function is consolidated back within the HRD at the earliest convenience. PART OPEN PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.	Cabinet Member for Housing	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Affects 2 or more wards		Ward(s): All Wards	
September				
Cabinet	1 Sep 2014	Adult Learning & Skills Service - Provision of specialist IT services This report seeks approval for expenditure related to the provision of specialist Management Information Services (MIS) for the Council's adult learning service (Adult Learning & Skills Service; ALSS). The Tribal Group Ltd is a specialist education information software and services business supplier and has been	Cabinet Member for Health and Adult Social Care	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Affects 2 or more wards		Ward(s): All Wards	

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		<p>satisfactorily delivering the MIS since 2007.</p> <p>The MIS enables ALSS to track individual learners' progress, accreditation and qualifications as well as submit funding claims to the Skills Funding Agency (SFA), a division of the Department for Business Innovation & Skills. The SFA grant to the Council's adult learning & skills service annually exceeds £2.8m. Accurate monitoring and accountancy is a compulsory requirement for performance management, continued funding and adherence to Ofsted standards.</p> <p>The Tribal Ltd MIS contract is currently valued at £75,924 pa.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>		
Cabinet	<p>1 Sep 2014</p> <p>Reason: Expenditure more than £100,000</p>	<p>Speech and Language Therapy Services - Extension of Service Level Agreements (2014-2016)</p> <p>Requests agreement to extensions to the Service Level Agreement's (SLA's) for speech and language therapy services for 2014 - 2016. The extensions are required to enable a procurement exercise to be completed.</p> <p>PART OPEN</p> <p>PART PRIVATE</p>	<p>Cabinet Member for Children and Education</p> <p>Ward(s): All Wards</p> <p>Contact officer: Mike Potter, Margaret Murphy Tel: 020 8753 2045 mpotter@westminster.gov.uk, Margaret.Murphy@lbhf.gov.uk</p>	<p>A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.</p>

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Cabinet	1 Sep 2014 Reason: Expenditure more than £100,000	<p>Property Asset Data Management - Proposed Call-Off</p> <p>Seeking approval to a proposed call-off contract.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	<p>Cabinet Member for Finance</p> <p>Ward(s): All Wards</p> <p>Contact officer: Maureen McDonald-Khan maureen.mcdonald-khan@lbhf.gov.uk</p>	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	1 Sep 2014 Reason: Expenditure more than £100,000	<p>Tri-borough Corporate Services Review Report</p> <p>This report describes the recommendation and business case to establish a Tri-borough Corporate Service including an Executive Director re-organisation, Tri-borough ICT, Tri-borough Procurement, Tri-borough Legal, Tri-borough Revenues & Benefits and Bi-borough Customer Services function.</p>	<p>Cabinet Member for Finance</p> <p>Ward(s): All Wards</p> <p>Contact officer: Jane West Tel: 0208 753 1900 jane.west@lbhf.gov.uk</p>	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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Cabinet	1 Sep 2014	<p>Options Appraisal in Respect of an Alternative Provision Bi-Borough Pupil Referral Unit (PRU)</p> <p>To outline the need for a Bi-borough PRU (LBHF/RBKC) and discusses the property issues associated with that proposal.</p>	Cabinet Member for Children and Education	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	
Cabinet	1 Sep 2014	<p>84 - 90 Fulham High Street. Lifting of restrictive covenant</p> <p>To remove a restrictive covenant for 28 affordable houses which benefits the Council in lieu of a financial payment of £1.8m by the landowner/ developer to implement to current consent.</p> <p>PART OPEN</p> <p>PART PRIVATE</p> <p>Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	Cabinet Member for Finance	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): Palace Riverside	
Cabinet	1 Sep 2014	<p>Change ICT service desk supplier and provision</p> <p>At the end of the HFBP service contract the Council will need to transition all ICT services to other suppliers. By changing the service desk earlier than contract expiry, H&F will be able to reduce the effort, costs and risk and align to the one team Tri-borough. This paper recommends an early transition from the current service</p>	Cabinet Member for Finance	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	

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		<p>desk provider to the new service desk provider by calling off the Tri-borough framework contract which has the benefit of providing a consistent user experience for staff.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>		
Cabinet	<p>1 Sep 2014</p> <p>Reason: Expenditure more than £100,000</p>	<p>50 Commonwealth Avenue</p> <p>Approval to sell 50 Commonwealth Avenue as it is surplus to requirements and is not suitable for letting as substantial repairs are required.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	<p>Cabinet Member for Finance</p> <p>Ward(s): Wormholt and White City</p> <p>Contact officer: Marcus Perry Tel: 020 8753 6697 Marcus.Perry@lbhf.gov.uk</p>	<p>A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.</p>

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Cabinet	1 Sep 2014	<p>Transfer of 5 properties from Environment, Leisure and Residents' Services (ELRS) to Housing (HRA)</p> <p>Approval is sought to transfer the properties from ELRS to Housing, and thus requiring appropriation from General Fund (GF) to the Housing Revenue Account (HRA).</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	Cabinet Member for Housing	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): Palace Riverside; Ravenscourt Park; Sands End	
Cabinet	1 Sep 2014	<p>Youth Services 2015-2018 - contract extension and Commissioning Strategy</p> <p>A report seeking approval to extend existing youth service contracts until 30 September 2015 and the Commissioning strategy for Youth Services 2015-2018.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	Cabinet Member for Children and Education	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	

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Cabinet	1 Sep 2014	Corporate Revenue Monitor 2014/15 month 2 Forecast Revenue Outturn position at end of month two. Requests for budget virements.	Cabinet Member for Finance	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	
Cabinet	1 Sep 2014	Extension and re-tender recommendations for Insurance contracts 2015 This report seeks approval to extend five of seven contract lots for insurance for two years in accordance with the contractual terms at last procurement in 2012. These allow the Council, at its sole discretion, to extend the contract terms by a period of up to two years until 31st March 2017. This report seeks approval to re-procure two of seven contract lots for insurance to improve service delivery and assurance. PART OPEN PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.	Cabinet Member for Finance	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	

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Cabinet	1 Sep 2014	Proposed Outsourcing of Commercial Property Management Function Lot 1 of New Property Contract. PART OPEN PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.	Cabinet Member for Finance	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	
Cabinet	1 Sep 2014	2013-14 Revenue Outturn Report This report presents the revenue monitor as at 2013-14 financial year end.	Leader of the Council	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Affects 2 or more wards		Ward(s): All Wards	
Cabinet	1 Sep 2014	Proposed revocation of decision to enlarge New King's School and discontinue Sulivan School To consider the outcome of consultation which closed on 12 August 2014	Cabinet Member for Children and Education	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Affects 2 or more wards		Ward(s): Parsons Green and Walham; Sands End; Town	

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October				
Cabinet	6 Oct 2014 Reason: Affects 2 or more wards	Draft Hammersmith and Fulham Local Plan – Approval of consultation document The Core Strategy and Development Management Local Plan are being revised in order to include new policies for the part of the Old Oak area that is within H&F. The opportunity is being taken to combine the 2 separate documents into one document but many existing policies remain largely unchanged.	Cabinet Member for Environment, Transport & Residents Services Ward(s): All Wards Contact officer: Pat Cox Tel: 020 8753 5773 pat.cox@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	6 Oct 2014 Reason: Expenditure more than £100,000	CPZ J Match Day Parking Consultation Report A consultation of residents and businesses in CPZ J asking whether they want match day parking controls introduced in response to the parking pressures that events at Loftus Road stadium caused on the surrounding streets.	Cabinet Member for Environment, Transport & Residents Services Ward(s): Shepherds Bush Green Contact officer: Naveed Ahmed Tel: 020 8753 1418 Naveed.Ahmed@lbhf.gov.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
Cabinet	6 Oct 2014 Reason: Expenditure more than £100,000	Contract for the supply of temporary agency workers H&F's contract with Pertemps for the supply of temporary agency workers will expire on 1st October 2015 without the possibility of an extension. Given the importance of maintaining flexibility in resourcing, the overall contract value and the time scale for a tendering process, we are seeking decisions on the objectives, options and timescale for procuring a new contract. PART OPEN PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the	Leader of the Council Ward(s): All Wards Contact officer: Debbie Morris, George Lepine Tel: 0208 753 4975 debbie.morris@lbhf.gov.uk, george.lepine@HFHomes.org.uk	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.

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		<p>authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>		
Cabinet	<p>6 Oct 2014</p> <hr/> <p>Reason: Expenditure more than £100,000</p>	<p>Health Trainer Service Contract Award Decision</p> <p>th health trainer service has been retendered on a triborough basis to achieve efficiencies and a standard quality of service. A decision is required about contract award by each Council.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	<p>Cabinet Member for Health and Adult Social Care</p> <hr/> <p>Ward(s): All Wards</p> <hr/> <p>Contact officer: Christine Mead Tel: 020 7641 4662 cmead@westminster.gov.uk</p>	<p>A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.</p>
Cabinet	<p>6 Oct 2014</p> <hr/> <p>Reason: Expenditure more than £100,000</p>	<p>TfL funded annual integrated transport investment programme 2015/16</p> <p>This report refines and details the integrated transport programme which forms part of the councils approved transport plan (LIP2). This report is seeking approval for the design, consultation and implementation of various elements of the programme and delegation of approval for construction of the capital programme to the Cabinet Member for Environment, Transport and Residents Services.</p>	<p>Cabinet Member for Environment, Transport & Residents Services</p> <hr/> <p>Ward(s): All Wards</p> <hr/> <p>Contact officer: Nick Boyle Tel: 020 8753 3069 nick.boyle@lbhf.gov.uk</p>	<p>A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.</p>

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Cabinet	6 Oct 2014	<p>Permission to tender for bi-borough printing, scanning and payment processing contracts for Parking Services</p> <p>A bi-borough Parking Service was established in April 2014. Linked to the procurement of a shared Parking IT system scheduled for implementation in mid 2015, the boroughs will need to separately retender for services covering the printing of statutory documentation and the scanning and processing of incoming post and payments.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	Cabinet Member for Environment, Transport & Residents Services	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000		Ward(s): All Wards	
December				
Cabinet	1 Dec 2014	<p>Contract Award for a Bi-Borough Parking Management Information System</p> <p>Award of a Bi-borough contract for a Parking Management Information System for processing of Penalty Charge Notices, Permits and Suspensions.</p> <p>Note the approval on 7th April to go out to tender included delegation of the Contract award to the lead Cabinet Member in each borough.</p> <p>PART OPEN</p> <p>PART PRIVATE</p>	Cabinet Member for Environment, Transport & Residents Services	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
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January

Cabinet	5 Jan 2015	ASC Information and Signposting Website - People First	Cabinet Member for Health and Adult Social Care	A detailed report for this item will be available at least five working days before the date of the meeting and will include details of any supporting documentation and / or background papers to be considered.
	Reason: Expenditure more than £100,000	<p>Discussions and decision around rolling out the People First ASC information and signposting website to LBHF. Currently operational in RBKC and WCC.</p> <p>PART OPEN</p> <p>PART PRIVATE Part of this report is exempt from disclosure on the grounds that it contains information relating to the financial or business affairs of a particular person (including the authority holding that information) under paragraph 3 of Schedule 12A of the Local Government Act 1972, and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	<p>Ward(s): All Wards</p> <p>Contact officer: Mark Hill mark.hill2@lbhf.gov.uk</p>	