

EPPING FOREST LOCAL PLAN EVIDENCE BASE DOCUMENTS

COMMENTS ON:

GARDEN TOWN GUIDANCE NOTE (EB1416) (ED33)

GARDEN TOWN STRATEGIC VIABILITY ASSESSMENT (EB1417) (ED 35) &

GARDEN TOWN IDP (EB1418) (ED 34)

**ON BEHALF OF MARTIN GRANT HOMES, PERSIMMON HOMES &
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Appendix 1: Copy of comments submitted to EFDC on 5 October 2018

Appendix 2: Copy of comments submitted to EFDC on 12 March 2019

1. Introduction

- 1.1 During the EIP Session 'Matter 14 – infrastructure and Delivery' the Inspector acknowledged the limited opportunity afforded to comment on EFDC's evidence regarding the Infrastructure Delivery Plan (IDP), Viability Assessment and Guidance Note pertaining to the Garden Town and afforded a period for parties to comment.
- 1.2 These comments on the following evidence base documents are prepared by Pegasus Group on behalf of Martin Grant Homes, Persimmon Homes and Taylor Wimpey, who are promoting land at West of Katherines within the Water Lane Area Allocation. The recently published evidence base documents are:
- Garden Town Guidance Note - "How to' Guide for Planning Obligations, Land Value Capture and Development Viability'(EB1416) (ED 33)
 - Garden Town Strategic Viability Assessment (EB1417) (ED 35)
 - Harlow & Gilston Garden Town IDP (EB1418) (ED34)
- 1.3 The West Katherines Development Consortium has been consulted at two stages of the production of the Garden Town Strategic Viability Assessment as well as the Garden Town Infrastructure Delivery Plan (GT-IDP) (ED34). For ease of reference, the previously submitted comments are attached in Appendix 1. However, we have outstanding comments on the finalised published documents which we submit for consideration.
- 1.4 We have reviewed the comments submitted to the Inspector in relation to Matter 14 on behalf of CEG and Hallam Land Management Ltd dated 10 April 2019 and concur with their concerns and comments. We raised our concerns regarding the Council's desire to apply paragraph 57 of the NPPF (2019) at the Examination Hearing on Matter 8 Garden Communities.
- 1.5 Whilst it is acknowledged that it is appropriate to consider infrastructure requirements and viability matters through the Examination, such consideration should be 'high-level' at this stage, allowing a more detailed assessment at the planning application stage and for this to reflect the updates to the Infrastructure Delivery Plan (GT-IDP) (ED34) including funding secured from external sources. As would be expected, this more detailed assessment would include an analysis of discounted cash flow, which will facilitate a more refined evaluation of

development viability, than which is possible at this time. Any assessment of viability at the plan-making stage should not be viewed as a substitute for the more detailed analysis which will occur at the planning application stage.

1.6 It is important that Local Plan policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. This is in line with para 173 of NPPF (2012) 'ensuring viability and deliverability'. The Council's Viability Assessment (EB1417) (ED 35) shows how the Benchmark Land Value (BLV) can be obtained at Water Lane – West Katherines and the other constituent parts of the Garden Town. The Council's own Strategic Viability Assessment demonstrates this by:

(a) Flexing the quantum and or tenure of affordable housing* and / or;

(* ref: EB1417, para 10.48 -10.49 & table 10.10)

(b) Varying the level of developer contribution towards infrastructure on a site basis (ref: EB1417, para 10.44 -10.47 & table 10.5);

(c) Varying infrastructure timing (ref: EB1417, para 10.29-10.36 & table 10.6); or

(d) Varying affordable housing & varied developer contributions (ref: EB1417, para 10.51-10.54 & tables 10.11a-c).

1.7 Whilst it is agreed that the planned growth and infrastructure package should not render the development unviable, in line with the Council's assessment this would rely on the adoption of one or more of the above measure(s) (A-D) as assessed within the Strategic Viability Assessment (ref: EB1417) to ensure deliverability.

1.8 Overall, the viability Garden Town Viability Assessment (EB1417) (ED 35) demonstrates that the Garden Town as a whole can support significant levels of infrastructure funding when measured against the totality of infrastructure costs whilst making a significant contribution to meeting the needs for affordable housing.

2. Harlow & Gilston Garden Town 'How to' Guide for: Planning Obligations, Land Capture and Development Viability (EB1416) (ED33)

- 2.1 The above 'How To' Guide (EB1416) was published on the Examination website in April 2019. We have the following comments in relation to the content and conclusions of this document.
- 2.2 It is clearly stated in the 'How To' guide (EB1416) at paragraph 4.1 (iii) that the Viability Assessment states that "*the growth and infrastructure package required is deliverable.*" As detailed in the preceding section, there will need to be the adoption of one or more of the measures as assessed within the Strategic Viability Assessment (ref: EB1417) to ensure viability and deliverability.
- 2.3 The Garden Town IDP (EB1418) (ED34) recognises that there is a funding gap. The 'How to' Guide highlights the potential funding from additional external sources which may be available (paragraph 4.2). We have previously highlighted in our comments that any potential external funding has not been accounted for in the viability modelling at this stage. It is recognised that the Councils are working jointly and pro-actively to secure external funding to assist in delivering the planned growth. Furthermore, that the Garden Town IDP will be periodically updated to reflect; external funding & more refined understanding of infrastructure costs which at present contain significant risk allowances & contingency.
- 2.4 Paragraph 4.2 of the 'How To' Guide discuss a '*rolling infrastructure fund*' which may be used to deliver the next piece of prioritised infrastructure rather than individual funding streams. This is supported.
- 2.5 It is stated that that an additional document relating to infrastructure for the Garden Towns will be produced post EiP. Paragraph 5.7 refers to a joint SPD on Planning Obligations for the Garden Town. It will be necessary that stakeholders have an opportunity to comment on this document. Furthermore, the level of developer contributions sought by the SPD should be informed by the findings of the Strategic Viability Assessment (EB1417) and allow the delivery of the sites to be viable.
- 2.6 Policy H2 Parts D and E of the submission draft Local Plan contain the ability to flex affordable housing to achieve viability where necessary.

- 2.7 Paragraph 6.3 (iii) (EB1416) states that at application stage it will be necessary for the applicant to produce a 'Statement of Delivery' in relation to viability and deliverability to support an application. EFDC's 'Homework Note 12' (Matter 5: Site Section and Viability) (ED56-HW12) sets out proposed amendments to paragraph 3.14 in the supporting text to Policy H2 (Affordable Housing) which reflects this. We welcome the further clarification this wording brings.

3. Garden Town Strategic Viability Assessment (EB1417) (ED 35)

3.1 The above Evidence Base document was published on the Examination website in April 2019. We have the following comments in relation to the content and conclusions of this document.

3.2 This evidence base document (EB1417) does not include the potential SANGS costs in relation to Epping Forest, which are expected to be in the region of £2,500,000. It should therefore be recognised that the impact of SANG on the Garden Town allocations in relation to costs and developable area could influence future Viability Assessments.

3.3 Whilst the Viability Assessment (EB1417) assesses the impact of;

(a) flexing the quantum and or tenure of affordable housing* and / or;

(b) varying the level of developer contribution towards infrastructure on a site basis

(c) Varying infrastructure timing;

(d) Varying affordable housing & varied developer contributions

It falls short of provide definitive conclusions in relation to the preferred measure or combination of measures. As does the 'How to' Guide (EB1416).

3.4 The LPA has issued Homework Note 12 to the Examination (May 2019) which provides clarification of the proposed future application of Paragraph 57 of the NPPF (2019) when determining planning applications.

3.5 Paragraph 57 of NPPF (2019) states that;

“Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into

force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available."

- 3.6 The PPG states that at the plan-making stage, levels of affordable housing and infrastructure should be set to provide certainty at the decision-making stage and makes clear that different levels can be used (paragraph 001 reference ID: 10-001-20180724 & paragraph 002 Reference ID:10-002-20180724).
- 3.7 The Strategic Viability Assessment (EB1417) does not come to any conclusions on the appropriate level of developer contributions / affordable housing. Whilst it tests a number of scenarios it does not go onto identify which of those scenarios is favoured. The inference from EFDC's Guidance Note (EB1416) and Homework Note 12 (Matter 5: Site Selection and Viability) (ED56-HW12) suggested amendment to Policy H2 (Affordable Housing) in that infrastructure will be prioritised and affordable housing flexed. The IDP (ED34) and Guidance Note (EB1416) should make it more explicit that the quantum and / or tenure of affordable housing may need to be flexed in order to ensure growth is delivered alongside the infrastructure package sought by the IDP (ED34).

4. Conclusions

- 4.1 We continue to have concerns that Epping Forest District Council (EFDC) is seeking to apply the provisions of the NPPF (2019) paragraph 57 in a manner that is procedurally inconsistent with the Examination of the Plan.

- 4.2 Whilst we support the production of the Garden Town Infrastructure Delivery Plan (IDP) and consider that the key infrastructure necessary to achieve the Garden Town growth is deliverable, the '*Planning Obligations, Land Capture and Development Viability*' (EB1416) should make it more explicit as to the flexibility needed to affordable housing to ensure development viability as identified in the Council's Strategic Viability Assessment (EB1417).

APPENDIX 1

Copy of Comments submitted to EFDC on 5 October 2018

WEST KATHERINES: RESPONSE TO INFRASTRUCTURE ASSUMPTIONS, OCTOBER 2018

Part 1 – Corrections to table within ‘Consultation Notes – Strategic Viability Assessment – Sept 2018’ (ARUP)

As highlighted at our meeting on 26th September 2018, there appears to be a number of factual errors within the table on page 61 of the draft report ‘Consultation Notes – Strategic Viability Assessment – Sept 2018’ (ARUP) which contains a summary of the West Katherines site. Detailed below are our corrections;

Site Area (net and gross)

The below figures relate to the land north of Water Lane Allocation (excluding the land south of Water Lane);

Total area = 69.6ha

Gross Residential Development Area = 35.2ha

Local Centre = 1.1ha

Primary School = 2.2ha

Travellers Site = 0.5ha

Resultant Open Space (*including woodland/existing vegetation/SuDS and highways infrastructure) = 30.6ha

Number of planned units - The 3rd section; the submission version of the EFDC Local Plan details that the whole of the Water Lane Allocation will include 0.5ha Traveller Site. We note that the viability assessment includes 0.5ha on W Katherines (p61) and 0.5 ha on West Sumners (p63). This exceeds the requirement of the EFDC Local Plan. We understand that West Sumners emerging Masterplan makes provision for 0.5ha Traveller Site. We therefore question its inclusion within W Katherines (p61).

Any known infrastructure requirements and costs;

- It is not evident where the reference to 10ha of ‘additional strategic open space’ is derived from and the justification for this. This needs clarifying. We understand from recent discussions that W Katherine’s has been identified as a potential SANGS to mitigate impacts on Epping Forest from planned development within Epping Forest District. This needs clarifying.
- The development will include a local centre. The ability to secure a GP or Dentist Practice will depend on the NHS plans and model of delivery in this area. We understand that the NHS generally operate a hub and spoke model, with the spokes generally located in local population centres.

Known abnormal constraints and / or costs;

- Demolition and site clearance – a proportion of the site comprises glasshouses and associated hardstanding
- On-site remediation arising from former horticultural uses (i.e. hydrocarbons, asbestos etc)
-

Constraints that may reduce the amount of development;

The masterplanning work undertaken to date has demonstrated that the quantum of development proposed (inc 1,149 units) can be accommodated with the known constraints (including; limited area within flood zone 3, part of the site is within a Conservation Area, the site includes protected woodland etc).

PART 2 – Response to specific questions within ‘Harlow and Gilston Garden Town IDP – Developer Engagement Briefing Note’

TABLE 1. - INFRASTRUCTURE INTERVENTIONS				
Response to Q1 of the Specific Questions within ‘Harlow and Gilston Garden Town IDP – Developer Engagement Briefing Note’				
INFRASTRUCTURE ITEMS DERIVED FROM EPPING FOREST IDP – INFRASTRUCTURE	What needs to be delivered as part of the scheme? Q.1(a)	Delivered on site? Q.1(b)	Delivered off site? Q.1(b)	Which intervention support the delivery of Multiple Sites Q.1(C)

DELIVERY SCHEDULE (PART B, ARUP DEC 2017)				
WLA1 – WASTE WATER UPGRADES	YES – albeit we do not presently have a detailed assessment	Both - Strategic via off-site and some local on-site re-enforcement	Both - Strategic via off-site and some local on-site re-enforcement	YES
WLA2 UTILITIES (overhead lines)	YES	YES	NO	NO
WLA3 BRIDLEWAY UPGRADES	YES – we have one on-site	YES	Some	Yes
WLA4 HIGHWAYS	YES – Council modelling has identified a number of interventions, albeit, to address the totality of planned growth	Mainly Off-site	Mainly Off-site	YES
Wla5 PUBLIC TRANSPORT	YES We understand the Council's emerging proposals for enhancing public transport.	Combination – a transport corridor is proposed to link through site and into Pinnacles. Off-site enhancements form part of the Council's emerging vision.	Combination - Link through site via direct delivery by developers where in ownership / control. Some off-site to be delivered by Council (may need to use CPO powers to create links over 3 rd party land)	YES. Public transport interventions are to support wider planned growth + benefits existing residents.
WLA6 PUBLIC TRANSPORT	YES	Combination – a transport corridor is proposed to link through site and into Pinnacles. Off-site enhancements form part of the Council's emerging vision.	Combination – a transport corridor is proposed to link through site and into Pinnacles. Off-site enhancements form part of the Council's emerging vision.	YES
WLA7 EDUCATION – EARLY YEARS	YES	ON SITE (2fe Primary and early years proposed on-site)	NO	NO
WLA8 – EDUCATION - PRIMARY	YES	ON-SITE (2fe Primary and early years proposed on-site)	NO	NO
WLA9 – HEALTH - dentist	No	Likely off-site - given NHS preferred nature of delivery. [Note that the proposals for the site includes a local centre which could accommodate such a facility]	Likely off-site - given NHS preferred nature of delivery. [Note that the proposals for the site includes a local centre which could accommodate such a facility]	YES
WLA10 – OPEN SPACE (Public parks)	Yes – Direct. [Masterplan supplied to EFDC demonstrates scope for sizable areas of open space].	ON-SITE	NO [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	NO
WLA11 – OPEN SPACE (amenity greenspace)	Direct [Masterplan supplied to EFDC demonstrates scope for sizable areas of open space].	ON-SITE [Masterplan supplied to EFDC demonstrates scope for sizable areas of open space].	NO [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	NO
WLA12 – OPEN SPACE – (Children & Young)	Direct [Masterplan supplied to EFDC demonstrates scope for sizable areas of open space].	ON-SITE [Masterplan supplied to EFDC demonstrates scope for sizable areas of open space].	NO [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	NO
WLA13 – OPEN SPACE – (Allotments)	Direct [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	ON-SITE [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	NO [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	NO
WLA14 – COMMUNITY FACILITIES	Direct [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	ON-SITE in local centre	NO [the site would meet its own needs as demonstrated by Draft Masterplan supplied to EFDC]	NO

TABLE 2 - Response to Q2 of the Specific Questions within 'Harlow and Gilston Garden Town IDP – Developer Engagement Briefing Note'
Are there any interventions that the Council's have identified as being required to support your site that you disagree with / do not believe are required?

Sangs	This intervention may be required to support the plan as a whole. However, at this stage it remains unclear what the Council are seeking. Therefore, we cannot currently assess if it is compatible with the planned development as a whole. We are keen to have a discussion about what the Council are seeking.
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	Notwithstanding this, it needs to be borne in mind that this intervention is not required to mitigate the impact of the planned development at West Katherines as the site lies outside of the Zone of influence for Epping Forest. Based on recent discussions, it is understood that EFDC may wish to see the open space on-site form mitigation for wider growth planned within the Zone of Influence. This intervention would support other sites within EFDC. It is likely to be a cost to the development.			
Location of sustainable transport corridor through Pinnacles to the north	Whilst a route can be delivered within the West Katherines site, to create a link through to Pinnacles requires 3 rd Party Land outside of our ownership / control. Whilst we do not have an in-principal objection to this link, it will require the Council to acquire 3 rd party land to do so. We understand from discussions with ECC that there are alternative options for sustainable transport corridors which utilise and upgrade current transport / movement corridors. Such an option could deliver similar benefits but reduce the cost and complexity of delivery.			
TABLE 3 - Response to Q3 of the Specific Questions within ‘Harlow and Gilston Garden Town IDP – Developer Engagement Briefing Note’ Are there any infrastructure interventions that the Council’s have not identified as being required that you think would be required to support the delivery of your site?				
OTHER INFRASTRUCTURE (NOT INCLUDED IN THE EPPING FOREST IDP – INFRASTRUCTURE DELIVERY SCHEDULE (PART B, ARUP DEC 2017))	What needs to be delivered as part of the scheme? Q.1(a)	Delivered on site? Q.1(b)	Delivered off site? Q.1(b)	Which intervention support the delivery of Multiple Sites Q.1(C)
Bus interchange	YES – site has been identified as a location for a bus interchange	ON-SITE	NO	Yes – West Sumners would benefit
Local Centre	YES – development would include a local centre	ON SITE	NO	NO
Secondary Education	YES -	OFF-SITE	YES	YES
Primary Health care provision	TBC	OFF-SITE	YES	

QUESTION 4 - TECHNICAL WORK ON INFRASTRUCTURE

WSP have undertaken initial investigations with regard to existing utilities infrastructure on or near to the site and has had some response regarding the need for capacity upgrades. This was undertaken on the basis of 1,000 dwellings, plus an allowance for a primary school, employment and mixed use areas. A summary of the main services is provided as follows:

- **Water – supplied by Affinity Water**

Existing clean water assets are present on all sides of the development site. These are assumed to be domestic supplies to the residential, commercial and retail properties in the vicinity. There are 2 No 450 DI mains that run parallel with the site to the west and cut across the south west corner of the site. Some local reinforment is expected to be required to supply the site, this will require further consultation with Affinity Water.

- **Waste Water – supplied by Thames Water**

Existing waste water assets are present on all sides of the development site. These are assumed to be domestic supplies to the residential, commercial and retail properties in the vicinity. There are various 150mm and 300mm diameter sewers present within the site boundary to the south and south west. Strategic improvements to Waste Water treatment for the area will be required (common to all Harlow development) and local network enhancements will be required, this will require further consultation with Thames Water.

- **Gas – supplied by National Grid Gas**

Existing LP and MP gas networks are present to the north and to the east of the proposed development site. These existing networks currently feed residential, commercial and retail areas. National Grid has stated that the Medium Pressure main, located approx. 150m from the development site, could be a possible option for the new Connection Charging Point. However, this main has insufficient capacity for the required demand and would require some upstream m reinforcement. This option would need further detailed analysis of the local network with more accurate loading information and further consultation with National Grid to determine and confirm the outage / connectivity feasibility and location.

- **Electric – supplied by UK Power Networks**

There are a number of existing HV and LV networks surrounding the development site. These are assumed to be supplies to the residential, commercial and retail areas. There are also a number of overhead LV assets located within the development site, these are assumed to be domestic supplies to agricultural properties. There are some HV Assets located to the north of the development site. The current preferred solution, stated by UK Power Networks, is as follows:

- New Connection point at Harlow West Grid
- 2 No circuit breakers at Harlow West Grid substation
- 2 No 11kV cables from Harlow West to site
- 4 panel switchboard on site - building to be supplied by customer
- Approx. cost £2.3m

- **Telecoms – supplied by various**

There are various, existing overhead and underground assets present adjacent to the development site and present within the development site boundary. Further consultation would be required with Openreach BT and / or Virgin Media in order to determine connectivity feasibility and location

In summary, access to the major utilities is available in the local area but capacity is not currently available for the whole completed development within the existing networks. Upgrades and reinforcement will be required as would be expected with a development of this size. It is possible that some development could commence in advance of upgrade works. Further engagement will be required with statutory authorities to ascertain the scale and cost of upgrade works, however no fundamental obstacles to development have been found.

QUESTION 5 - ENGAGEMENT WITH STAKEHOLDERS

As listed above, the utility companies have been approached regarding plant locations and capacity for future development. this will be an ongoing process with design studies required in some instances to establish appropriate solutions to supplying the site.

In addition, a transport assessment scoping meeting has been held with Essex County Council to agree the approach to transport assessment for the site.

QUESTION 6 – ANY FURTHER ISSUES IN TERMS OF INFRASTRUCTURE REQUIREMENTS

WLA4 – WLA4 HIGHWAYS - We have sought clarification as to the costs estimate as the works look very expensive. We were advised from ECC that a significant contingency had been incorporated.

WLA5 – PUBLIC TRANSPORT – We consider that the sum looks reasonable for the two sites (W Katherines + W Sumners) combined.

WLA6 – PUBLIC TRANSPORT - again looks very expensive and no details yet of what it entails. As detailed above, there appear to be less complex and costly means of providing public transport corridors.

APPENDIX 2

Copy of Comments submitted to EFDC on 12 March 2019

Clare Fairweather

From: Gabrielle Rowan
Sent: 12 March 2019 17:08
To: Sarah Pullin; Trudie Baker; David Coleman; Vicky Forgione; Adam Halford; Simon Drummond-Hay (simon@hdhplanning.co.uk); Dan Evans (Dan.Evans@arup.com); 'Anna Richards' (Anna.Richards@arup.com)
Cc: Robert Barber
Subject: RE: Infrastructure and Viability meeting - Response from West Katherines Consortium

Dear All

Further to the recent viability workshop, please find below comments from the West Harlow Consortium in relation to the St Katherines site.

It is important that the Harlow and Gilston Garden Town delivers attractive, balanced and sustainable communities supported by appropriate infrastructure. However, it is also imperative that the cumulative impacts of infrastructure costs and other policies do not threaten development viability and in turn the delivery of much needed housing.

The Strategic Viability Assessment needs to take a holistic view of the Garden Town. The Garden Town IDP / Strategic Viability Assessment should include; summary as to the extent to which the Harlow and Gilston Garden Town as a whole can contribute towards the total infrastructure costs arising without threatening viability. The Strategic Viability Assessment indicates that the Harlow and Gilston Garden Town as a whole can meet a sizable proportion of the projected £823.08m infrastructure costs.

In this regard, the Garden Town IDP should rank infrastructure by way of importance. This would assist in identifying those elements which are essential or key deliverables and those that are deemed to be desirable. It is noted in the SVA (12.137) that levels of strategic infrastructure and mitigation costs tested are at the top of the range normally found – and are twice that anticipated in the Harman Guidance. Ranking would also help prioritise funding and how best to direct / pool contributions towards those matters.

The Strategic Viability Assessment indicates that the component parts of the Harlow and Gilston Garden Town can meet a sizable proportion of the £823.08m infrastructure costs. However, the Strategic Viability Assessment demonstrates that not all sites can viably sustain an equal level of contribution. A more weighted approach to the APPORTIONMENT of costs across the Garden Town should be explored. The current disaggregation of infrastructure costs for the Garden Town should be revisited based on the findings of the Strategic Viability Assessment.

During the previous round of consultation, it was highlighted that Part of Water Lane – West Katherine's is under glasshouses (c19ha) and as such has a higher existing use than agricultural land. This makes the site distinct from parts of the Garden Town which are benchmarked against agricultural values +. Whilst the Residual Value for West Katherine's is broadly comparable with other parts of the Garden Town, the **Benchmark Land Value** reflects the current uses.

The assessment in Table 10.9a (page 119) shows how the BLV can be obtained at Water Lane – West Katherine's via either;

- (a) reducing the quantum of affordable housing or;
- (b) varying the level of developer contribution towards infrastructure.

In terms of (a) above, the assessment does not undertake a sensitivity analysis on the effect of a different tenure mix. Offering greater flexibility on tenure (currently assessed as 81% affordable rent / 19% Intermediate) would have a positive effect on development viability. This should be explored.

In terms of B) above, it would be possible to vary the developer contribution by taking a more weighted approach to the distribution of infrastructure costs across the Garden Town as a whole. It is common in CIL and s106 schedules to have differential rates, albeit these need to be set at a level that does not risk development delivery. In this regard, it would be helpful if the Strategic Viability Assessment set out the 'surplus value' (over BLV) to be 'captured' across the sites.

Alternatively to (a) and (b) above, set the level of contribution so it does not threaten viability, acknowledging that the total of 16,538 homes planned will go a substantial way in funding the full infrastructure costs for the Garden Town. Whilst this may give rise to a small gap between the total identified funding from development and the full list of infrastructure items, it should be acknowledged that;

- A significant (20%) contingency has been built into the assessment of the majority of infrastructure costs. It is anticipated by Officers that the level of contingency required will come down as the various schemes are designed and come forward. This would clearly assist reducing the overall infrastructure costs and closing any gap.
- No allowance is made for external funding. It is also acknowledged that the various partner organisations are seeking to maximise external funding.
- As acknowledged at para 12.135, revisiting assumptions on infrastructure payments would assist viability.

Inconsistencies with model and report:

1. Number of dwellings assumed:

- i. Allocation is approx. 2,100.
- ii. HD refer to 2,500

2. Report refers to £63,592,002 of total S106 costs but model uses £61,263,336

Phasing adds up to a different number again. Need to clarify.

Water Lane phasing - strategic infr and mitigation costs

2018-2023	£	1,592,443
2023-28	£	43,141,973
2028-2033	£	13,239,794
2033-2038	£	635,863
2038-2043	£	635,863
2043+	£	1,674,439
TOTAL	£	60,920,375

3. Need to resolve land areas.

Report refers to:

- i. Gross of 72.33 Ha based on allocation (presumably north and south). However, our calculations are gross 77.4Ha (north of water lane 69.6 Ha and south of water lane 7.8 Ha).
- ii. Net of 38.03 Ha. This is 1311/35 dph i.e. derived rather than plan based. Our calculations are residential net 37.7 ha (north 35 Ha and south 2.7ha) – other uses include a local centre 1ha and primary school 2.5 ha.

- iii. Gross of 63.38 Ha. This is a “policy compliant” land area i.e. 38.03 grossed up based on 60% net to gross. Therefore 8.95 Ha within allocation boundary not included in modelling.

4. Threshold Land Value / EUV+

1. Need to clarify the threshold land value. The appraisal refers to £525k per Ha blended. However, this does not square with the inputs and methodology.
2. Also, the model refers to £585,552.

	Ha	EUV / Ha	EUV Total	Uplift Rate	Uplift	TOTAL
Glasshouses	19	£ 1,000,000	£ 19,000,000	20%	£ 3,800,000	£ 22,800,000
Agricultural	44.38	£ 22,500	£ 998,550	£ 300,000	£ 13,314,000	£ 14,312,550
	63.38		£ 19,998,550			£ 37,112,550
			£ 315,534			£ 585,556
			Per Gross Ha			Per Gross Ha

5. Construction Costs

1. Our submission was that this should build up as follows
 - i. Base build
 - ii. 15% for externals
 - iii. Uplift for abnormals – demolition, remediation, abnormal foundations
 - iv. Harman type allowance for on-site highways, utilities, drainage, on-site open space
 - v. Plus S106 package – off-site highways, schools etc
2. The model is based on:
 - i. Base build
 - ii. 15% for externals
 - iii. Uplift of 1.5% (£3m) for abnormals – demolition, remediation, abnormal foundations plus 3.25% (£6.5m) contingency
 - iv. No allowance for on-site highways, utilities, drainage other than identified in the IDP
 - v. Plus S106 package
3. Main deficiency is therefore on-site highways, utilities and drainage not identified in the IDP

6. Mix

1. Concerns over mix remain from previous round of consultation
2. Noted that mix in model does not match the mix in the report. However, noted that report refers to mix not being applied rigidly.

Model

Market	Bed No.	%
Flat	1	4.88%
	2	6.01%
House	2	13.02%
	3	50.06%
	4	20.03%
	5	6.01%
		100.00%

Affordable	Bed No.	%
Flat	1	18.05%
	2	14.10%
House	2	21.99%
	3	36.09%
	4	9.77%
	5	0.00%
		100.00%

Report (noting that %s do not add up to 100%)

Market	Bed No.	%
Flat	1	6.80%
	2	1.20%
House	2	24.40%
	3	67.60%
	4	2%
	5	0%
		102.00%

Affordable	Bed No.	%
Flat	1	2.90%
	2	16.10%
House	2	27.60%
	3	41.10%
	4	10.50%
	5	0
		98.20%

We would be grateful if you could take these comments into consideration when finalising the IDP. If you need any further information from the project team, please let me know.

Kind Regards

Gabrielle

Gabrielle Rowan

Associate

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PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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