

CIL Revenue and Gap Funding – Supporting Evidence Paper

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1. Introduction

The purpose of this paper is to provide additional background on the potential for CIL income that might be generated in Breckland to provide for infrastructure. This paper seeks to summarise the level of any infrastructure funding gap and how this might be able to be closed through the implementation of CIL in Breckland.

The starting point for the preparation of a Charging Schedule is for Local Authorities to demonstrate there is an aggregate infrastructure funding gap.

This paper does not seek to duplicate information contained within the Council's CIL viability evidence which includes advice on development costs, residual land values and the approach instalments. This paper seeks to point to the existing source documents, but does bring together a summary of identified infrastructure needs.

This report does not seek to prioritise any existing infrastructure requirements. The Breckland Integrated Delivery Document (BIDD) has undertaken an initial prioritisation of a range of infrastructure projects in consultation with a range of partner organisations (such as the HCA, Norfolk County Council, NHS and Anglian Water Services) to develop a targeted list of projects for delivery in the short, medium and longer term. The BIDD is due to be updated by mid 2013.

2. Scale of Development and the Spatial Strategy

The scale of development within the Breckland District is established within the Spatial Strategy of the Core Strategy and Development and Control Policies Development Plan Document which was adopted in 2009.

The Spatial Strategy identifies a development hierarchy for the scale of development with Thetford being the key focus for growth within the District with the largest quantum of housing, employment and retail provision. The market town of Attleborough will see substantial growth, predominantly in housing and the employment sector due to its strategic position along the A11 corridor. The market towns of Dereham, Swaffham and Watton are well located to provide a good range of services to surrounding hinterlands, however, despite the towns service offer there are a number of constraints which limit the level of housing, employment or retail growth, independently. A number of Local Service Centre villages were identified which contain adequate services and facilities to meet the day to day requirements of existing residents. Of these Service Centre Villages, Harling, Narborough, Shipdham and Swanton Morley were identified to see a positive housing allocation. Snetterton Heath Employment Area is considered a key employment location along the A11 corridor. Many rural settlements and the wider countryside which fall outside of classifications that are specifically set out in the development hierarchy will therefore will be protected from inappropriate development.

Core Strategy Policies identify housing, employment and retail provision within the District. Overall provision is made for the development of at least 19,100 new homes between 2001 and 2026, 6,000 new jobs including up to 85 ha of employment land and retail provision of up to 20,750 sqm (net) comparison floorspace and 7,250 sqm (net) convenience floorspace between 2008 and 2018. These figures have to be balanced against subsequent adoption of Development Plan Document including updating of evidence base to support these documents. In particular, retail provision within the adopted Core Strategy was based upon the 2007 Retail and Town Centre Study and was subsequently updated in 2010 to reflect changes in market conditions within the district. The 2010 Retail and Town Centre Study indicated a range of

lower capacity figures compared to that of 2007, and recommended up to 11,600 sqm (net) comparison goods and 4,000 sqm (net) convenience goods be rolled forward to 2021 in subsequent Development Plan Documents.

The Site Specifics Policies and Proposals Development Plan Document (adopted Jan 2012) identifies land for an additional 1,264 new homes up to 2026 in the towns of Dereham, Swaffham, Watton, Narborough, Shipdham and Swanton Morley (beyond that which had already been permitted as of the 31st March 2010).

The Thetford Area Action Plan (TAAP) (adopted July 2012) confirms the delivery of an urban extension of 5,000 dwellings, allocation of 22ha of employment land. A planning application for an Urban Extension was submitted to the Local Authority in 2011 prior to the adoption of the TAAP, but has yet to be determined. Overall, the planning application proposes housing, employment and retail development consistent with that proposed within the TAAP. Due to the sensitivity of the surrounding environment of Thetford, the housing numbers were reduced from 6,500 as identified in the adopted Core Strategy to 5,000 as adopted through the TAAP.

Growth in Attleborough is anticipated to be delivered through an extension of the town, of 4,000 new homes, 10 ha of employment land in Attleborough and up to 20 ha in Snetterton Heath, in accordance with the requirements of the Core Strategy. Retail development of approximately 1,200 sqm for comparison and convenience goods was identified up to 2012.

Table 1 summarises the adopted Core Strategy requirements against the detailed allocations in the adopted Site Specifics DPD, and proposed through the adopted TAAP and proposed growth at Attleborough remaining from the Core Strategy.

	No. of dwellings		Employment (ha)		Retail Provision Core Strategy (sqm)		Retail provision adopted DPD's and anticipated Growth (sqm)	
	Adopted Core Strategy	Adopted DPD's and anticipated growth	Adopted Core Strategy	Adopted DPD's and anticipated growth	Retail Comparison 2007-2018	Retail Convenience 2007-2018	Retail Comparison 2010-2021	Retail Convenience 2010-2021
Thetford	6,500	5,000	30-40	22 including 18 at the TEP	7,000-7,500	2,000 -2,2500	3,800	1,000
Attleborough	4,000	4,000	10	10	2,250-2,750	1,750-2,250	1,200	1,200
Dereham	600	600	5-10	6.2	7,750-8,8500	2,000 -2,500	4,900	1,800
Swaffham	250	250	Minimum of 5	8.8	1,000-1,500	0	0	0
Watton	214	300	n/a		250-300	0	0	0
Harling	50	0	n/a		n/a		n/a	
Narborough	50	50	n/a		n/a		n/a	
Shipdham	100	100	n/a		n/a		n/a	
Swanton Morley	50	50	n/a		n/a		n/a	
Snetterton	n/a	n/a	20		n/a		n/a	
Comments	<p>Housing figures for Thetford were reduced as a result of the potential effects of growth on European sites.</p> <p>Growth in Watton was reduced to account for 'early' planning approvals granted outside of the settlement boundary under national approach to proposals where LPA cannot demonstrate a 5 year land supply.</p>		<p>There is broad conformity with anticipated growth adopted DPD's and to the adopted Core Strategy.</p>		<p>Evidence base reflects updated Retail and Town Centre Study (2010) to reflect changes in market conditions.</p>		<p>A positive retail allocation was not provided for Swaffham and Watton within the Site Specifics DPD due to extant permissions.</p> <p>The retail requirements set out within the TAAP have been informed by the latest Retail and Town Centre Study (2010), produced after the adoption of the Core Strategy. The study indicates a range of lower capacity figures which have reduced the requirements for comparison and convenience floorspace to 2021.</p>	

	<p>Harling did not include a housing allocation within the Site Specifics DPD , due to 'early' planning applications which have met the full extent of Harling's housing requirements as set out within the Core Strategy.</p>			
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Table 1 – Summary of growth proposals

3. Evidence Base

Breckland Council has developed a range of evidence base sources that set out the need for infrastructure in the District. The key evidence documents are:

- Breckland Growth Infrastructure Study (2009) – EDAW/ AECOM
- Water Cycle Study – Stage 2 (2010) – Scott-Wilson
- Breckland Integrated Delivery Document incorporating a local Investment Plan (2010) – Capita Symonds Ltd.

Key evidence relates to the District-wide Growth Infrastructure Study and the Breckland IDD, which seeks to locally prioritise infrastructure requirements.

4. Infrastructure Requirements and Costs

The funds generated by CIL are to be spent on infrastructure. The definition of Infrastructure for the purposes of CIL is set out at Section 216(2) of the Planning Act (2008) as amended. This is as follows:

Section 216: Application

(1) Subject to section 219(5), CIL regulations must require the authority that charges CIL to apply it, or cause it to be applied, to funding infrastructure.

(2) In subsection (1) “infrastructure” includes—

- roads and other transport facilities,
- flood defences,
- schools and other educational facilities,
- medical facilities,
- sporting and recreational facilities,
- open spaces, and
- affordable housing (being social housing within the meaning of Part 2 of the Housing and Regeneration Act 2008 (c. 17) and such other housing as CIL regulations may specify).

Regulation 59 of CIL Regulations (2010) as amended, allows for a Charging Authority to apply to CIL to funding of improvements, replacement, operation or maintenance of infrastructure to support the development of its area.

5. Summary of Infrastructure Costs and Funding Gap

Table 2 provides a summary of identified infrastructure needs across Breckland to deliver the scale of growth planned for in the Council’s current adopted Planning framework. The table includes proposed funding mechanisms.

Location	Infrastructure Type	Total cost	Committed Public Funding	Lead Agency	CIL or S106	Gap
Attleborough	Education	£33,457,008	-	NCC	S106	£33,457,008
	Transport	£14,000,000 ¹	-	NCC/Highways Agency	S106 and CIL	£14,000,000
	Healthcare	£3,000,000	-	NHS Norfolk	S106	£3,000,000
	Open Space & Play	£11,482,660	-	BDC/TC	S106	£11,482,660
	Utilities	£12,050,000	£10,000,000	Anglian Water	-	£2,050,000
Attleborough Total		£73,989,668	£10,000,000			£63,989,668
Dereham	Transport	£1,333,333	-	NCC	S106	£1,333,333
	Open Space & Play	£1,738,720	-	BDC/TC	S106	£1,738,720
	Utilities	£1,543,023	£1,000,000	Anglian Water	S106	£543,023
	Healthcare	£450,000		NHS Norfolk	CIL	£450,000
Dereham Total		£5,065,076	£1,000,000			£4,065,076
Swaffham	Healthcare	£450,000		NHS Norfolk	CIL	£450,000
	Utilities	£500,000	£500,000	Anglian Water	-	-
Swaffham Total		£950,000	£500,000			£450,000
Thetford	Education	£38,443,260	-	NCC	S106	£38,443,260
	Healthcare	£4,464,000	-	NHS Norfolk	S106	£4,464,000
	Open Space & Play	£11,866,660	£105,000	BDC/TC	S106	£11,761,660
	Indoor Sport	£2,326,395	-	BDC	S106	£2,326,395
	Transport	£61,367,425 ²	£3,525,000	NCC/Highways Agency	S106 and CIL	£57,842,425
	Utilities	£12,462,000	-	EDF Energy	S106	£12,462,000
Thetford Total		£130,929,740	£3,630,000			£127,299,740
	Land for High School expansion. ³		-	NCC	S106	

¹ The transport cost is taken from the EDAA study. The Attleborough transport studies when complete will update these costs.

² Includes an estimate for a new bridge over the railway of £15m.

	Healthcare	£450,000	-	NHS Norfolk	CIL	£450,000
	Open Space	£510,960	-	BDC/TC	S106	£510,960
	Utilities	£88,000	£88,000	Anglian Water	-	-
Watton Total		£1,048,960	£88,000			£960,960
Narborough	Open Space	£30,000	-	BDC/PC	S106	£30,000
Shipdham	Open Space	£160,000	-	BDC/PC	S106	£160,000
	Transport	£14,500	-	NCC	S278	£14,500
Swanton Morley	Open Space	£30,000	-	BDC/PC	S106	£30,000
	Transport	£200,000	-	NCC	S106	£200,000
LSC Total		£434,500				£434,500
Rest of District	Community Facilities	£291,017	-	NCC	CIL	£291,017
	Education	£7,550,000	-	NCC	CIL	£7,550,000
	Healthcare	£8,600,000	-	NHS Norfolk	CIL	£8,600,000
	Indoor Sport	£1,500,000	-	BDC	CIL	£1,500,000
	Transport	£3,000,000	-	NCC	CIL	£3,000,000
Rest of District Total		£20,941,017				£20,941,017
Breckland Total		£233,358,961	£15,218,000			£218,140,961

Table 2 - Summary of infrastructure needs across Breckland

³ Cost unknown.

6. Methodology

The emerging CIL viability evidence report (produced by Capita Symonds 2013) suggests potential CIL rates for differing forms of development. Table 3 sets out a summary of the proposed rates.

Development Class	Draft CIL Rate (£ per m2)	
Residential (C3)	Residential Zone 1 – Attleborough, Dereham and rural parishes (excluding those to the south west of the District.	Residential Zone 2 – Market towns (excluding Attleborough and Dereham) and other rural parishes
	£60	£0
Employment (B1, B1s, B2 and B8)	£0	
Retail (A1) (outside defined town centres, as contained on the adopted policies map)	£150	
Out of centre Retail Warehouses (A1) – where subject to a planning condition or legal agreement restricting use to bulky goods.	£100	
Retail (A3,A4 and A5)	£0	
Hotel	£140	
Tourist Accommodation	£30	
Residential Care Homes	£90	
All other development	£0	

Table 3 – Draft CIL rates summary

In order to provide further detail as to the amount of CIL that might be generated by the scale of development identified for the district appraisals of schemes have been carried out (included in section 9). The schemes that have been appraised to inform this paper relate to those allocated within the high value zone, and particularly are contained within the Site Specifics or windfall sites in the rural parishes. In order to establish a comparator value, (using information provided by Norfolk County Council for average planning obligation costs) a s106 rate has been calculated using a standardised charge of £6,563 per market dwelling.

7. Meaningful Proportion to Communities

The CIL regulations include the requirement for a meaningful proportion of the income from CIL to be retained by the Town and Parish Council for the area where the development has occurred. The Department for Communities and Local Government announced on 10th January 2013 the percentage of CIL as the 'meaningful proportion' which Towns or Parish Councils would receive. In areas where there is an adopted Neighbourhood Plan, the Town or Parish Council will retain 25% of the total CIL receipts. In areas where there is no adopted Neighbourhood Plan, the Town or Parish council would be entitled to 15% of the CIL receipts. In this case the amount from CIL would be capped at a maximum of £100 per existing household. There is no maximum cap for areas with a Neighbourhood Plan.

Currently within Breckland there has not, at the time of producing this paper, been any formal request from a Town or Parish council to commence the development of a Neighbourhood Plan. As such, the following rates set out the level of meaningful proportion which would be applicable for the Town or Parish Council at 15% up to a maximum of £100 per existing dwelling.

8. Residential Income

Using the proposed CIL rate as set out within the viability assessment, it is possible to consider potential revenue from the CIL charge for developments in the higher value zone. The proposed CIL rate as set out within the viability assessment is £60 per sqm. Developments such as the proposed urban extension within Attleborough have not been included as the developer contribution is likely to be in the form of a s106 agreement. This approach is in accordance within Regulation 55 of the CIL Regulations 2010, which allows for an exemption from CIL on viability grounds, subject to the applicant entering into a s106 agreement where the value of a planning obligation is greater than the amount that would be liable to be paid as a result of CIL. Furthermore the cost of complying with the s106 agreement must be greater than the chargeable CIL rate. These developments are likely to have specific infrastructure costs associated with the site which are likely to be borne in isolation.

9. Potential CIL Income – Worked Examples

The following section compares some specific examples and establishes (at a very broad level), what the amount of CIL income would be if those proposals were to come forward after the Council implemented CIL at the current draft rate. The calculations have been carried out using average dwelling sizes and housing mixes as set out within Breckland's Strategic Housing Market Assessment. The potential CIL rate for these examples has been calculated to take account of the full affordable housing requirements, as set out within Policy DC4 Affordable Housing Principles of the Core Strategy.

SH1: Shipdham - 85 houses

Using the SHMA mix for house sizes the total size of the development for market housing would be **3,694 sqm**. Therefore based on £60 per m², the total CIL income would be **£221,640**. By comparison, Norfolk County Council currently seek to negotiate s106 agreements at an approximate rate of £6,563 per market dwelling, which would create a total obligation of £331,714.

Shipdham does not currently have a Neighbourhood Plan. The 'meaningful proportion' of the CIL income which would be available for Shipdham Parish Council based on the above would be £33,246. If the Parish had produced a Neighbourhood Plan, the amount available to them as a proportion of the CIL charge would be £55,410.

NAR1: Narborough and SM1: Swanton Morley 50 houses

Both sites NAR1 in Narborough and SM1 in Swanton Morley have been allocated for 50 dwellings through the Site Specifics Policies and Proposals DPD. The total size of the market dwellings on these sites, using the standard dwelling mix and size, would be **2,730 sqm**. Therefore the potential CIL income would be **£163,800** for each of the development sites. This is compared to an equivalent scheme entering into a s106 obligation of £196,890.

The 'meaningful proportion' of CIL which would be available to either Narborough or Swanton Morley parish councils would be 15% of the total CIL rate (capped at a maximum of £100 per existing dwelling), as neither parish has a neighbourhood plan. The meaningful proportion that would be generated by these developments for the parishes equates to £24,570.

Rural Windfall Housing Schemes

Analysis has been carried out considering the level of rural windfall development since 2001. This analysis considered the number of dwellings which had been completed on sites of less than five dwellings. This level was used as affordable housing contributions start on sites of five or more dwellings. As such, these sites would not normally have a s106 agreement.

House type	Average dwelling size (m2)
1 bedroom	52
2 bedroom	75
3 bedroom	95
4+ bedroom	115

Table 4: Average dwelling size

Using the average dwelling size (m2) listed in Table 4 above for these dwellings (which has been informed by Breckland's SHMA) and considering the average number of dwellings completed each year within the CIL charging zone, **£769,910** could be raised each year. The average level of CIL was calculated to allow for changing market conditions and the impact this has on housing delivery. If we extrapolate the average level of completions forward for the remainder of the plan period this could raise **£10,008,830** for infrastructure provision. Taking into account the 15% for parish councils (assuming they do not have a neighbourhood plan adopted) this reduces to **£8,507,505**.

Without the adoption of CIL in the District, the majority of rural windfall sites fall below existing S106 thresholds and as such, would not be able to contribute to infrastructure provision through such agreements. Therefore, as can be seen above, with a relatively modest CIL rate there will still be an additional level of funding that can be secured for infrastructure provision under CIL that would not have been captured otherwise.

10. Potential Income from Commercial Development

The Viability Assessment demonstrates that there is no surplus available for CIL on B-Class Developments (as defined within the Use Class Order) and therefore Breckland is unable to charge CIL on commercial developments. This scenario is not uncommon given the current economic climate. However, the scale of development that could have sought CIL for commercial funding equates to a total of 42,796 sqm when considering permissions granted for net new commercial floorspace (combined B1, B2 & B8) since the 1st January 2009. This figure does not include the 39,960sqm at Snetterton Heath for the erection of a hotel, conference facilities, offices, engineering/light industrial units for racing as this was submitted as an outline application.

In terms of future existing undeveloped employment land (which includes allocations through the Site Specific Policies and Proposals DPD, TAAP (including the Thetford Enterprise Park) and approximate allocations within Attleborough) there is 101 ha available/proposed employment land to be taken up over the remainder of the plan period, to 2026. As a working example, taking the 22 ha of employment land proposed in the Thetford SUE, when applying a ratio of 0.4⁴ as an approximate figure, Thetford will not be charging CIL for 8.8ha of future employing land.

11. Retail

The preliminary draft charging schedule incorporates a CIL rate of £150 per sqm on A1 use classes in out of centre locations. In town centre locations the preliminary draft charging schedule sets a CIL rate of £0 per sqm. The Retail and Town Centre Study (2010) recommended up to 11,600 sqm (net) comparison goods and 4,000 sqm (net) convenience goods floorspace to 2026, which gives a total of 15,600m². Therefore, utilising a CIL rate for retail development of £150 per sqm could yield a potential CIL income of £2,340,000, if the sites come forward outside of the designated town centres. The table below quantifies the CIL rate and potential yield in relation to each market town.

Town	Additional Retail Sales Floor Space sq m (net)				Total Floor Area sq m (net)	CIL rate (based on £150m ²)
	Comparison		Convenience			
	2010-2016	2016-2021	2010-2016	2016-2021		
Thetford	-	3,800	300	700	4,800	£720,000
Dereham	1,700	3,200	1,700	100	6,700	£1,005,000
Attleborough	600	600	1,100	100	2,400	£360,000
Swaffham	300	400	-	-	700	£105,000
Watton	500	500	-	-	1000	£150,000
Total	3,100	8,500	3,100	900	15,600	£2,340,000

Table 5 – Summary of Retail Floorspace Proposals

It is worth noting that the National Planning Policy Framework contains a town centre first approach. The NPPF requires a requirement for a sequential test to be applied to planning applications for town centre uses that are not located within the designated town centre.

Turning to other 'A Class' Uses (A2 - A5), the viability appraisals do not demonstrate sufficient viability to support CIL, and as such, a rate of £0 should be applied to these uses.

12. Hotel Accommodation

In terms of hotel accommodation, Breckland District does not generate a significant number of hotel developments, however there have been two large schemes approved in the District since 2006. The viability appraisals reveal that hotel type development could support a CIL rate of between £140 to £270 per sqm based on a

⁴ Greater Norwich Development Partnership - Greater Norwich Employment Growth and Sites & Premises Study, 2008 (plot ratios will vary in practice according to the spatial distribution and context of development, however, this is to provide an example/estimate of what the area could yield)

typical "chain hotel" example. The total size of the development to provide a restaurant and hotel accommodation along the A11 corridor near Snetterton equates to 2,800 sq m which would yield a potential CIL income of between £392,000 (based on £140 per m²) and £756,000 (based on £270 per m²) when implemented. The Premier Inn in Thetford which was granted planning permission in 2007 and completed soon thereafter, with a gain of 2,200 sq m and would have yielded a potential CIL income of between £308,000 and £594,000.

13. Tourism Accommodation

The viability analysis reveals that whilst holiday accommodation is viable and could support CIL, this would be at a level that could be considered to be so low (assessment shows £6.71 per sqm) that it may not be appropriate, on the balance of general viability, to charge for this development type. However, if the Council were to propose a rate for holiday accommodation then a figure of between £5 to £40 per sqm could be levied. However, a successful balance could be considered around £30 per sqm.

Breckland commenced monitoring tourism development/holiday accommodation from 2009. For the most part, applications that have gained planning consent are predominantly conversion of, or a change of use to, which would not normally be liable for CIL. However, an application for 22 lodges in Saham Toney for a mixture of 2, 3 and 4 bed units was approved in May 2010. This type of development could yield a CIL rate of the following:

No. of bedrooms	No. of Units	Average size (m ²)	Total (m ²)
2	2	112	224
3	15	144	2,160
4	5	225	1,125

Table 5 – Summary of holiday unit floorspace

Using the average dwelling size (m²) listed in Table 5 above for these holiday units, the total developed floorspace of the units would be **3,509 m²**. Using a proposed CIL rate of £30 per sqm this would result in a CIL income of **£105,270**.

14. Residential care/nursing home developments

The appraisals also reveal that residential care/ nursing home developments could support a CIL rate of around £90 per sqm. Over the last few years a number of care homes and been permitted within the District. A retirement village comprising of a care home and 13 assisted living units was granted planning approval in Swaffham in 2012. The care home itself comprises of a total of 2,028 sq m which would yield a potential CIL income of **£182,520**. Furthermore, an application for the development of eight homes with care units including communal space was approved in Shipdham in 2012. The total quantum of floorspace approximates to 587 sq m which offers the opportunity to yield a potential CIL income of **£17,610**.

15. Administration costs

Regulation 61 of the CIL regulations 2010 allows Charging Authorities to utilise up to 5% of CIL receipts to cover administration costs (based on the income received during previous financial year).

16. Infrastructure Funding Gap

The Stage 1 CIL Evidence Base Report was completed in **2011** and was the first stage in preparing the Breckland CIL. The report concluded that overall cost of infrastructure associated with the planned growth in Breckland was **£209,961,470**. At the time of undertaking the study, some **£16,255,000** was already accounted for through public and utility company funding which left a net infrastructure funding gap of **£193,736,470**. The report advised that **£149,990,470** should continue to be sought under existing S106 agreements as on site infrastructure and the remaining **£59,971,000** could be funded in part through CIL and other mechanisms.

A full review of the Breckland infrastructure needs has been undertaken. This review has taken in to account updates or changes to evidence base, changes in CIL regulations and permitted and/or commenced planning applications. It would appear that that the overall cost of infrastructure associated with the planned growth in Breckland is now **£233,358,961**. Of this figure, some **£15,218,000** is accounted for through public and utility company funding which left a net infrastructure funding gap of **£218,140,961**. The review advises that **£195,849,944** should continue to be sought under existing S106 agreements as on site infrastructure and the remaining **£22,291,017** could be funded in part through CIL and other mechanisms.

The review of the Breckland infrastructure needs has revealed a slight increase in the cost of infrastructure to deliver the planned growth across the District. It is worth noting that these figures could be subject to change, when more detailed information is available from the Attleborough transport studies. The amount of money committed from both public and utilities funding has also marginally increased. The review of the infrastructure requirements shows an increase in the amount of funding which should be sought through S106 agreements, which in effect sees a decrease in the amount being required to be sought through CIL.

17. Conclusions

The proposed CIL rates within the District will go some way to closing the infrastructure funding gap, however the CIL will not entirely close the gap. This paper shows that there is the potential to raise £11.39million through CIL based on the expected levels of growth. Therefore a funding gap of £10.91million remains.

Furthermore, the amount of money raised will also need to take into account the 5% for administrative charge.