

Report of Consultation

Community Infrastructure Levy Preliminary Draft Charging Schedule



1. Introduction

- 1.1 The consultation of the Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule (PDCS) commenced on 26th June 2015 and ended on 7th August 2015. The Council received responses from 9 representors which raised approximately 90 separate individual representations. Several of the representors were written on behalf of wider consortiums, for example, Savills on behalf of a developer consortium comprising of Barratt Homes, Llanmoor Homes, Persimmon Homes and Taylor Wimpey. The representations and the Council responses can be viewed in Appendix 1.

2. Consultation Process

- 2.1 In accordance with Regulation 15 of the CIL Regulations 2010 (as amended), the Council published its PDCS and evidence base for consultation. Copies of the consultation documents were made available, along with the details of the consultation period, on the Council's website and were available for inspection at the Council's Information Station and all Newport Libraries. The consultation documents were sent to the consultation bodies in accordance with Regulation 15 and comments were invited. A list of consultation bodies consulted appears in Appendix 2. The consultation form sent out to consultees can be viewed in Appendix 3.
- 2.2 A statutory notice was placed in the South Wales Argus newspaper on 26th June 2015 to publicise the consultation.
- 2.3 The Council has complied with the consultation requirements as set out in Regulation 15 of the CIL Regulations.

3. The Responses

- 3.1 As noted above, responses from 9 representors were received within the consultation timeframe. The representations received and the Council responses can be viewed in Appendix 1. In addition to the consultation, Council officers and the Council's CIL consultants met with Savills who were representing the developer consortium of Barratt Homes, Llanmoor Homes, Persimmons Homes and Taylor Wimpey. This meeting was held on 23rd October 2015 and was a chance to engage further with key stakeholders and to understand representations in more detail and to address points where possible.

APPENDIX 1

Preliminary Draft Charging Schedule (PDCS) Consultation Responses

Representor	Comments	Council Response
<p>Afon Lwyd Greenway Working Group on behalf of Ponthir Community Council and Caerleon Tourism Forum</p>	<p>AFON LWYD GREENWAY CAERLEON VIA PONTHIR TO CWMBRAN BOATING LAKE</p> <p>This response to the above consultation has been compiled on behalf of the Afon Lwyd Greenway Working Group strongly supported by the Caerleon Tourism Forum and Ponthir Community Council.</p> <p>This is a proposal for a shared use off road cycleway through a green corridor of the Afon Lwyd valley from Caerleon via Ponthir to Cwmbran.</p> <p>We believe the Afon Lwyd Greenway project to be a key infrastructure project to be supported by the CIL and the Newport Growth Strategy and new City Region. It should form part of a strategic walking and cycling route and as part of the National Cycle Network to connect Caerleon to Cwmbran and as an extension of the NCN Route 88 (Caerleon to Newport and Cardiff). It appears on Sustrans Cymru’s Missing Links map submitted to Welsh Government, in the approved Newport LDP and we anticipate it will form part of Newport and Torfaen’s Active Travel Map and Local Transport Plans.</p> <p>We understand there is similar support being given to the project within Torfaen CBC.</p>	<ul style="list-style-type: none"> Agreed (included in the Infrastructure Development Plan)
	<p>Objectives</p> <ol style="list-style-type: none"> To extend the recently upgraded and completed 4Km Afon Lwyd Greenway from Chapel Lane to Cwmbran Boating lake southwards via Ponthir to Caerleon to connect with other similar off road National Cycle Routes in Newport and Torfaen. 	<p>The objectives are noted.</p> <p>Objective 8 is not applicable because it is not located within the Newport boundary.</p>

	<ol style="list-style-type: none"> 2. To provide a safe, attractive and predominantly level surfaced route suitable for walkers, cyclists, and wheelchair users to avoid the busy B4236 with its sub standard pavements and no provision for cyclists 3. To ensure a safe route to school for pupils attending Charles Williams Endowed School and Caerleon Comprehensive School from Ponthir, Forge Close Caerleon and other settlements adjoining the B4246. 4. To design the route as part of a linear open space improvement and local nature reserve improvement project incorporating the best practices of woodland management and nature conservation 5. To provide a route with connections from Cwmbran Central Park to Llantarnam, Ponthir and Caerleon and to adjoining settlements 6. To ensure safe connections to new Barrett housing estate, Llantarnam Road, Llantarnam School, Llantarnam village, Biscuit Factory, Llanfrechfa, Ponthir, Penrhos and Star Villas, Star Trading Estate, Forge Close, Caerleon, and The Hawthorns, Usk Road, Caerleon (<i>to join NCN 88 Newport route complete to City Centre</i>). 7. To assist the development of linked circular walks using the new route with existing public rights of way in both Torfaen CBC and the City of Newport. 8. To complement the completed Safe Routes in Communities project for Ponthir and Llantarnam/Oakfield. 9. To incorporate provision for horseriders wherever possible. 10. To meet the requirements of the Active Travel (Wales) Act 2013 	
	<p>General</p> <ol style="list-style-type: none"> 1. The Afon Lwyd route corridor options as a whole meet with many theoretical planning, countryside, environmental, health and lifestyle objectives of both City of Newport and Torfaen CBC and Welsh Government. 2. The main issues to be overcome with route selection are to minimise costs associated with development of the route largely in a flood plain and any road, river and railway crossings. 3. Levels and type of use of different sections would vary e.g Ponthir to Cwmbran route could have particularly strong workplace, safe route to 	<p>The General Comments are noted.</p> <p>General comments 9 and 10 are not applicable because they are not located within the Newport boundary</p>

	<p>town centre and rail station users.</p> <ol style="list-style-type: none"> 4. The whole route would have primary, secondary and University educational use and recreational amenity use. 5. The Forge Close – Usk Road section could form part of a circuit linked to the recently completed C2 Newport-Caerleon project serving the University of Newport Caerleon Campus and a large population in the Lodge Hill Newport estate area with links to Newport City centre. 6. The Ponthir Sewage Works amenity area link to the Star Industrial Estate would be popular for local users. 7. The whole route should form a key part of the National Cycle Network linking Cwmbran to Caerleon with connections to adjoining communities. 8. The Critical Care Centre planned for Llanfrechfa Grange is now planned by Welsh Government for completion in 2020 will generate considerable extra traffic on B4236 and this Greenway scheme will provide an attractive alternative walking and cycling route. 9. Any route via Llantarnam Abbey grounds needs to be dealt with great sensitivity. 10. The two existing level crossings for public rights of way at Tram Lane, Llanfrechfa and at Ponthir are both potential hazards to walkers and cyclists – that at Tram Lane requires an advance Whistle warning from train drivers approaching from the north. Network Rail has a national policy 1 to seek closure to public use wherever possible. An expensive overbridge at Tram Lane would be difficult to justify but an easy option for walkers and cyclists for the Ponthir crossing would be the formation of links to the field rail underpass at the rear of Hafod Road nearby. 11. The section of route between Usk Road Caerleon and Forge Close and to the Star trading Estate within Newport is considered to be easily deliverable with landowner agreements already agreed in principle. 12. The sections of route following existing public rights of way should also be easily deliverable together with the use of the Welsh Water access roads and tracks subject to landowner agreements. 13. The route is well placed for interpretation of the natural and industrial heritage – nature conservation along the banks of the Afon Lwyd and various woodland areas and grassland habitats plus the 18th century 	
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	<p>Ponthir Tinplate Works remains, old tramways and leats.</p> <p>14. Maintenance liabilities: route development and design should aim to keep these to the minimum.</p> <p>15. On going discussions are taking place with Network Rail.</p>	
	<p>Progress to Date</p> <p>A Torfaen CBC Section</p> <ol style="list-style-type: none"> 1. 4Km section of Afon Lwyd Greenway completed from Chapel Lane to Cwmbran Boating lake via Llanyrafon Shopping area 2. Llanyrafon Manor Restoration Project: Now complete - this should be a focal point for the Afon Lwyd Greenway with its interpretation, cafe and community facilities (cycle parking may be required). 3. Network Rail has recently upgraded the level crossings at Tram Lane and Ponthir making them safer for walkers and cyclists with a level board walk. However NR has a policy to seek closure to public use wherever possible. 1 - see footnote below 	Not Applicable
	<p>B. Newport City Section</p> <ol style="list-style-type: none"> 1. Ponthir – Caerleon Section – route from Usk Road – Forge Close included in approved Newport Local Development Plan. First 1Km within Newport Old Boys Rugby Club recently resurfaced with stone. 2. Newport Active Travel Network shows the route described in 1 above. 3. Project fully supported by Caerleon Tourism Forum and Caerleon and running clubs. 	Noted
	<p>C. Opportunities and Future Justification of the Route Development</p> <ol style="list-style-type: none"> 1. Whilst there are inevitably difficulties in getting Welsh Government funding at the present time with present cutbacks and the limitations of the Local Transport Fund, the route development and/or feasibility study clearly meets the new City Region and key settlement 	4.The St Cadocs site has not been allocated for housing within the LDP. It is a large brownfield site within the settlement boundary which may come forward for development in the future but there are no plans known at present.

	<p>policies.</p> <ol style="list-style-type: none"> 2. The advent of the Critical Care Centre (CCC) at Llanfrechfa Grange due for 2020 will put huge pressure on the B 4236 corridor between Cwmbran and Caerleon. This road is entirely unsuitable for cyclists and has substandard footways for much of its length. Apart from within the village of Ponthir there are no alternative routes on minor roads. Whilst it is understood that planning gain funding from the CCC scheme may have already been allocated there should be a good case for a contribution towards this project. 3. The University of South Wales Campus at Caerleon attracts students and staff who need to use this travel corridor. Although this campus is due to close shortly any new institutional, commercial or residential use could be expected to generate similar levels of traffic. 4. A large part of the St Cadocs hospital site has been included in the LDP for housing which provides another opportunity for CIL funding towards the scheme. The scheme will provide opportunities for sustainable travel as the housing development will exacerbate existing traffic problems. 5. There is a large employment base at the Star Industrial Estate and along the Ponthir Road Caerleon where the workforce would greatly benefit from a safe route 6. Further housing development is taking place adjacent to the Spa Supermarket and Boxer Trading Estate which might include a planning gain element. 7. School journeys make up a considerable part of the traffic flow between Ponthir and Caerleon and the Travel Plan for Caerleon Comprehensive School clearly sets out the need to provide a Safe Route to Ponthir. The newly merged Infant and Junior School to form the new Charles Williams Church in Wales Primary School in 	<ol style="list-style-type: none"> 6. There is an extant planning permission for housing development at the McReadys site. There will not be an opportunity to seek CIL contributions from this development. 8. Not applicable because it is not located within the Newport boundary.
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	<p>Caerleon, is still expected to generate a huge amount of traffic in this B4236 corridor and new School Travel Plans need to be formulated. Moreover the proposed stricter rules to be applied for school transport from September 2013 – two miles for primary school pupils and 3 miles for secondary school pupils – will further justify the need for such plans and safe walking and cycling routes to school.</p> <p>8. Torfaen has advanced plans to rebuild Croesyceliog School. This should again be an opportunity to review the School Travel Plan and catchment issues.</p> <p>9. Reopening of Caerleon Rail Station as part of the Valleys Metro proposals would stimulate the need for safe links to the catchment area which would undoubtedly include Ponthir</p> <p>10. Tourism and Visitor Use: The route would be an undoubted attraction to visitors to the area particularly because of the links it creates to historic Caerleon, industrial and natural heritage sites particularly the Brecon Beacons National Park and Blaenafon World Heritage Site. It would greatly benefit local businesses and traders and encourage cycle hire. Caerleon Tourism Forum strongly support the concept as part of the development of Caerleon as a Cycle Tourism hub. See ANNEX1.</p> <p>11. Local Transport Plans 2015 – 2020: There is a new requirement for local authorities in Wales to prepare Local Transport Plans (LTP's) by the end of March 2015. These can be written individually or as joint plans with neighbours. The cross border Afon Lwyd Greenway as described in this Briefing Note would be an ideal project for inclusion by both the City of Newport and Torfaen CBC.</p>	
	<p>PHASING</p> <p>1. An incremental approach to development of the route as whole is most likely to be successful in grant applications and to gain</p>	Noted

	<p>momentum for implementing the whole scheme over a number of years.</p> <ol style="list-style-type: none"> 2. Quick wins for low cost easily deliverable and key sections of route provided land negotiations are successful would be for the Ponthir Hafod Road rail under pass link to the Welsh Water Access Road avoiding the level crossing AND the Caerleon Forge Close – Usk Road link. 3. Local member support should be sought in conjunction with the scheme as a whole and land owner negotiations. 4. Early discussions needed with Network Rail (Ponthir Community Council to help) Welsh Water, Star Industrial Estate Star Industrial Estate ,and Newport Old Boys Rugby Club 5. Land negotiation and purchase/ leasing /licences costs should be built into grant applications 6. Assistance of Ponthir Community Council with land owner negotiations would be greatly advantageous. 	
	<p>3. Resourcing of Further Work on the Scheme: Further discussions needed with prospective partners - Torfaen CBC support the need for a feasibility study on the scheme subject to availability of grants. Scheme features in draft Active Travel Network Newport City proposals subject to final assessment of priorities. Capita prepared to put in staff time to be set against future successful grant applications. Help in kind or possibly financial to be discussed with Ponthir Community Council .Some Sustrans Cymru Staff and Volunteer Ranger work can be expected to continue on the project.</p>	Noted
	<p>4. Possible Funding and deadlines for submissions</p> <ul style="list-style-type: none"> ➤ Wales Government – ESDD Small Scale Project Funding Applications 2015-16 pending ➤ Welsh Water – crucial partner for route either side of Ponthir. ➤ Natural Resources Wales – Further advice needed from Countryside Officers Torfaen and Newport Contact needed. Joint schemes between neighbouring authorities likely to meet recent policy objectives. Scheme 	Noted

	<p>to feature in ROWIPs.</p> <ul style="list-style-type: none"> ➤ Environment Agency Wales – Flood plain issues, Japanese knotweed and Himalayan balsam eradication along route. ➤ Network Rail – May be willing to fund some works in association with closure of level crossings and alternative routes and related matters. ➤ Reopening of Caerleon Rail Station as part of the Valleys Metro and City Region proposals would stimulate the need for safe walking and cycling links to the catchment which would undoubtedly include Ponthir and give further justification for this proposal. 	
	<p>Background: These notes build on proposals contained in the Ponthir Community Access Plan 2009 and relevant economic development, tourism, transport, planning, environmental, health and countryside policies and plans for the City of Newport and Torfaen CBC.</p>	Noted
<p>Lynne Richards (NCC Tourism Officer) on behalf of Caerleon Tourism Forum</p>	<p>AFON LWYD GREENWAY CWMBRAN BOATING LAKE VIA PONTHIR TO CAERLEON</p> <p>This response to the above consultation has been compiled on behalf of the Afon Lwyd Greenway Working Group strongly supported by the Caerleon Tourism Forum and Ponthir Community Council.</p> <p>We believe the Afon Lwd Greenway project to be a key infrastructure project to be supported by the CIL and the Newport Growth Strategy. It should form part of a strategic walking and cycling route and as part of the National Cycle Network to connect Caerleon to Cwmbran and as an extension of the NCN Route 88 (Caerleon to Newport and Cardiff). It appears on Sustrans Cymru’s Missing Links map submitted to Welsh Government, in the approved Newport LDP and we anticipate it will form part of Newport and Torfaen’s Active Travel Map and Local Transport Plans.</p> <p>We understand there is similar support being given to the project within Torfaen CBC.</p>	<ul style="list-style-type: none"> • Agreed (included in the Infrastructure Development Plan)

	<p>Objectives</p> <ol style="list-style-type: none"> 1. To extend the recently upgraded and completed 4Km Afon Lwyd Greenway from Chapel Lane to Cwmbran Boating lake southwards via Ponthir to Caerleon to connect with other similar off road National Cycle Routes in Newport and Torfaen. 2. To provide a safe, attractive and predominantly level surfaced route suitable for walkers, cyclists, and wheelchair users to avoid the busy B4236 with its sub standard pavements and no provision for cyclists 3. To ensure a safe route to school for pupils attending Charles Williams Endowed School and Caerleon Comprehensive School from Ponthir, Forge Close Caerleon and other settlements adjoining the B4246. 4. To design the route as part of a linear open space improvement and local nature reserve improvement project incorporating the best practices of woodland management and nature conservation 5. To provide a route with connections from Cwmbran Central Park to Llantarnam, Ponthir and Caerleon and to adjoining settlements 6. To ensure safe connections to new Barrett housing estate, Llantarnam Road, Llantarnam School, Llantarnam village, Biscuit Factory, Llanfrechfa, Ponthir, Penrhos and Star Villas, Star Trading Estate, Forge Close, Caerleon, and The Hawthorns, Usk Road, Caerleon (<i>to join NCN 88 Newport route complete to City Centre</i>). 7. To assist the development of linked circular walks using the new route with existing public rights of way in both Torfaen CBC and the City of Newport. 8. To complement the completed Safe Routes in Communities project for Ponthir and Llantarnam/Oakfield. 9. To incorporate provision for horseriders wherever possible. 10. To meet the requirements of the Active Travel (Wales) Act 2013 	<ul style="list-style-type: none"> • The objectives are noted. • Objective 8 is not applicable because it is not located within the Newport boundary.
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	<p>C . Opportunities and Future Justification of the Route Development</p> <ol style="list-style-type: none"> 1. Whilst there are inevitably difficulties in getting Welsh Government funding at the present time with present cutbacks and the limitations of the Local Transport Fund, the route development and/or feasibility study clearly meets the new City Region and key settlement policies. 2. The advent of the Critical Care Centre (CCC) at Llanfrechfa Grange due for 2020 will put huge pressure on the B 4236 corridor between Cwmbran and Caerleon. This road is entirely unsuitable for cyclists and has substandard footways for much of its length. Apart from within the village of Ponthir there are no alternative routes on minor roads. Whilst it is understood that planning gain funding from the CCC scheme may have already been allocated there should be a good case for a contribution towards this project.. 3. The University of South Wales Campus at Caerleon attracts students and staff who need to use this travel corridor. Although this campus is due to close shortly any new institutional , commercial or residential use could be expected to generate similar levels of traffic. 4. There is a large employment base at the Star Industrial Estate and along the Ponthir Road Caerleon where the workforce would greatly benefit from a safe route 5. Further housing development is taking place adjacent to the Spa Supermarket and Boxer Trading Estate which might include a planning gain element. 6. School journeys make up a considerable part of the traffic flow between Ponthir and Caerleon and the Travel Plan for Caerleon Comprehensive School clearly sets out the need to provide a Safe Route to Ponthir. The newly merged Infant and Junior School to form the new Charles Williams Church in Wales Primary School in 	<p>5. There is an extant planning permission for housing development at the McReadys site. There will not be an opportunity to seek CIL contributions from this development.</p>
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	<p>Background : These notes build on proposals contained in the Ponthir Community Access Plan 2009 and relevant economic development, tourism, transport, planning, environmental, health and countryside policies and plans for the City of Newport and Torfaen CBC.</p>	Noted								
Peter Hitchings	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td data-bbox="488 708 1178 975"> <i>The proposed PDCS is based on the findings of the Newport CIL Viability Report. Do you agree that the assumptions and methodology set out in this report are robust and that it represents an appropriate basis for determining the level of CIL that would be viable in the city council administrative area?:</i> </td> <td data-bbox="1178 708 1509 975">Yes</td> </tr> <tr> <td data-bbox="488 975 1178 1129"> <i>Do you agree with the CIL rates proposed for residential development as set out in paragraph 1.15 on page 5 of the PDCS? :</i> </td> <td data-bbox="1178 975 1509 1129">Yes</td> </tr> <tr> <td data-bbox="488 1129 1178 1284"> <i>Do you agree with how the geographical charging zones have been defined for residential development?:</i> </td> <td data-bbox="1178 1129 1509 1284">Yes</td> </tr> <tr> <td data-bbox="488 1284 1178 1366"> <i>Do you agree with the proposal to apply a single CIL rate across the city council administrative area for</i> </td> <td data-bbox="1178 1284 1509 1366">Yes</td> </tr> </table>	<i>The proposed PDCS is based on the findings of the Newport CIL Viability Report. Do you agree that the assumptions and methodology set out in this report are robust and that it represents an appropriate basis for determining the level of CIL that would be viable in the city council administrative area?:</i>	Yes	<i>Do you agree with the CIL rates proposed for residential development as set out in paragraph 1.15 on page 5 of the PDCS? :</i>	Yes	<i>Do you agree with how the geographical charging zones have been defined for residential development?:</i>	Yes	<i>Do you agree with the proposal to apply a single CIL rate across the city council administrative area for</i>	Yes	Noted
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<i>Do you agree with the proposal to apply a single CIL rate across the city council administrative area for</i>	Yes									

	A1-A3 retail uses?:		
	Do you agree with the proposal to apply a zero CIL rate to all other uses?:	Yes	
	Do you agree that the proposed CIL rates strike an appropriate balance between the desirability of funding necessary infrastructure and the potential effects of the levy on the economic viability of development across Newport?:	Yes	
	Please select one of the following::	I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector	
WYG on behalf of Sainsburys Supermarkets Ltd	<p>On behalf of our clients Sainsbury's Supermarkets Ltd (SSL) we have been instructed to submit the following representations in response to the current public consultation on the Newport Preliminary Draft CIL Charging Schedule (PDCS).</p> <p>SSL is a key land owner, employer and retail operator within the Newport authority area. As such, SSL is aware of the dynamics of the retail market in the context of the local Welsh economy and the potential impact a CIL charge could have on the future viability of various forms of new retail development. SSL are committed to continue its investment in the local economy and its existing portfolio of stores, thus securing jobs and increasing consumer choice.</p>		Noted
	<p>CIL threshold The PDCS proposes a flat rate of £100 per sqm for Class A1-A3 (retail) with no</p>		Sainsbury's has offered no evidence to justify a differential scale threshold for

	<p>imposition of a minimum threshold. SSL raise concern that this approach may adversely affect SSL's ability to adapt and develop its existing supermarkets to account for changing customer needs and market conditions. Imposing such a rate without specifying a lower level threshold would result in the CIL rate applying to any development over 100sqm. No exemption or reduction of the burden of CIL would be offered to smaller (often ancillary) retail development which will undoubtedly impact the viability of existing stores to adapt by means of extensions or alterations (e.g. the erection of complementary concessions such as 'Click and Collect' facilities or on-line deliveries). The proposed flat rate CIL charge will also impact SSL's capacity to invest in smaller scale Sainsbury's Local convenience stores throughout the authority area which will undoubtedly have a detrimental impact on the local economy and access to services in Newport. Indeed, given the cooling off in retail activity, it could impact on future retail development generally.</p>	<p>retail rates</p>
	<p>It should further be acknowledged that a flat rate approach with no lower threshold could effectively undermine the retail function of local and town centres that rely on small scale extensions (which may be marginally over 100sqm) to modernise and compete.</p>	<p>No evidence to support this statement</p>
	<p>Taking into account SSLs understanding of viability of convenience operations in the Newport context, it is considered a 1,000 sqm CIL contribution threshold for new retail development would be an appropriate before the full £100/sqm rate applied.</p>	<p>No evidence to support this statement</p>
	<p>The Land and Property Value Appraisal Study prepared by heb Chartered Surveyors (March 2015) states that commercial evidence informing the study was generally limited due to a 'lack of new build activity in the commercial market' (p17). The study also lacks a robust approach to its analysis as retail based scenarios assess only supermarkets/food retail outlets of 3,000 sqm (within a 1ha site) and other retail stores (Class A1-A3) of 300 sqm. The evidence base provides no consideration of extensions to existing facilities, nor does it consider a range of different scales of retail stores and formats. Evidence is gathered from far afield (including the A55 corridor in north Wales) and over a considerable period. Such an evidence base is not considered to be</p>	<p>It is considered that extensions would be viable which would then increase business capacity and building value but cost no more in terms of land acquisition</p>

	<p>sufficiently relevant to the current Newport context and does not, therefore, provide a sufficiently robust basis upon which to base a charging schedule. Furthermore, the 'general retail' category simply groups Class A1, A2 and A3 uses together. The viability characteristics of these three uses (and, indeed, different uses within a single use class) is highly variable rendering an exercise carried out in this way as almost meaningless.</p>	
	<p>No viability analysis has been prepared that gives any evidence to examine the potential need for a threshold (to remove/reduce the CIL burden from smaller ancillary extensions) and in the absence of adequate evidence, the lack of threshold cannot be justified. If such scenarios were to be examined it would be clear that there was no material difference between Existing Use Value and Gross Residual Value of a retail store with and without minor ancillary development (e.g. a click and collect facility) and therefore no margin from which to make a viable CIL payment.</p>	<p>We will undertake additional Viability Testing at different scales if required</p>
	<p>Notwithstanding the above, minor development which does generate a margin to support a small CIL contribution would struggle to viably make such a payment at the point of development being carried out (i.e. before the occupier benefits from the value of the development). This is particularly important given the findings of the PDCS & CIL Viability Assessment (NCS, June 2015) which confirms that developer led commercial development is largely not viable in Newport and that commercial development is reliant on occupier led development with the occupier reducing/removing any profit margin in order to pay CIL (para 6.4). The omission of such scenarios and considerations potentially gives a false picture of development viability in Newport.</p>	<p>This does not apply to retail development</p>
	<p>Contribution to Infrastructure Funding The PDCS & CIL Viability Assessment, June 2015, makes clear that because it is uncertain how much retail development may be exempt from CIL, no allowance has been made for potentially chargeable retail floorspace in the CIL revenue projections (para 6.13).</p>	<p>Noted</p>
		<p>Noted</p>

	Section 205 (2) of the Planning Act 2008 requires that: “In making the regulations the Secretary of State shall aim to ensure that the overall purpose of CIL is to ensure that costs incurred in providing infrastructure to support the development of an area can be funded (wholly or partly) by owners or developers of land.”	
	Furthermore, Part 3 Section 14 (1) of the CIL Regulations 2010 states that: “In setting rates (including differential rates) in a charging schedule, a charging authority must aim to strike what appears to the charging authority to be an appropriate balance between – (a) the desirability of funding from CIL (in whole or in part) and 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 b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area.”	Noted
	The charging authority in this instance has clearly not struck an appropriate balance between CIL funding from retail development and the cost of infrastructure as it has taken no account of CIL funding from retail development at all. Furthermore, the charging authority clearly has not appropriately taken account of the potential effects of the imposition of CIL on the economic viability of development across its area given that it is, in effect, needlessly attributing a CIL charge to retail development with no assessment of the likely benefit of doing so.	Noted but disagree
	It is clear that retail has not been appropriately considered as a source of funding within the PDCS & CIL Viability Assessment and therefore cannot be evidenced and/or considered as an appropriate source as it stands.	Noted but disagree
Savills on behalf of developer consortium comprising Barratt Homes, Llanmoor	We have reviewed the documentation forming the Council's evidence base in setting the proposed residential CIL rates which are as set out in the table below. Proposed Newport City Council Residential CIL	Noted

Homes, Persimmon Homes, Redrow Homes and Taylor Wimpey (the Consortium)	<table border="1"> <thead> <tr> <th>Location</th> <th>Proposed CIL Rate</th> <th>Affordable Housing</th> </tr> </thead> <tbody> <tr> <td>Apartments</td> <td>0</td> <td></td> </tr> <tr> <td>Malpas and Bettws – Zone 1</td> <td>£60 per sq m</td> <td>10%</td> </tr> <tr> <td>Newport East – Zone 1</td> <td>£60 per sq m</td> <td>20%</td> </tr> <tr> <td>Rogerstone/Newport West – Zone 2</td> <td>£25 per sq m</td> <td>30%</td> </tr> <tr> <td>Caerleon/Rural Newport – Zone 1</td> <td>£60 per sq m</td> <td>40%</td> </tr> </tbody> </table>	Location	Proposed CIL Rate	Affordable Housing	Apartments	0		Malpas and Bettws – Zone 1	£60 per sq m	10%	Newport East – Zone 1	£60 per sq m	20%	Rogerstone/Newport West – Zone 2	£25 per sq m	30%	Caerleon/Rural Newport – Zone 1	£60 per sq m	40%	
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<p>The Consortium wish to record their concern in relation to a number of specific points which are considered in further details below.</p>																				
<p>1. Are the tested typologies appropriate? 1.1 The evidence base confirms that the development strategy of the Council should be considered in setting CIL Rates and that the Local Development Plan (LDP) envisages that a substantial proportion of new development over the plan period will emerge from brownfield sites. It goes further, and confirms that all allocated residential development in all of the areas tested except for Caerleon/Rural Newport will be on previously developed sites.</p>		Noted																		
<p>1.2 This continues the trend whereby previously developed land has contributed over 80% of the five year supply on large sites between 2011-2014.¹ Similarly, over the same period, completions on brownfield sites has been above 85% of the large site supply in each year; in 2011 and 2014, all large site completions were on previously developed land.</p>		Noted																		
<p>1.3 The table below, which is reproduced from the Council's PDCS & CIL</p>		Noted																		

¹ Newport City Council Joint Housing Land Availability Study; study date 1 April 2014, Published March 2015.

Viability Assessment document dated June 2015 and prepared by Nationwide CIL Service (the CIL Assessment) identifies the houses (not flats) that will be developed in Newport on both brownfield and greenfield land during the plan period. This includes windfall sites and identifies that over 83% of all housing in Newport will be developed on brownfield land.

Newport Residential Unit Delivery			
Malpas & Bettws	Greenfield	Brownfield	Total
	76	434	510
Newport East	Greenfield	Brownfield	Total
	76	591	667
Rogarstone/Newport West	Greenfield	Brownfield	Total
	76	1005	1145
Caerleon/Rural	Greenfield	Brownfield	Total
	276	434	710

1.4 Based on this evidence, we consider that in setting the CIL rates, much greater weight should be placed upon the outcomes of the appraisals for brownfield sites rather than greenfield sites as this is much more typical of the development that will take place in Newport over the plan period.

Agreed – This study has been undertaken

1.5 Averaging the outcomes of both the greenfield and brownfield typologies, skew the results and creates the potential for rates to be set at levels which make significant levels of development unviable.

Disagree

1.6 The table below is reproduced from the CIL Assessment. It is clear from this that there are significant differences in the maximum amounts potentially available for CIL between greenfield and brownfield sites.

Noted

Maximum Residential CIL Rates Reproduced from the CIL Assessment

Maximum Residential CIL Rates per sqm					
Affordable Housing Zone & Base Land Value	Mixed Residential Development	Medium-Scale Mixed Development	Intermediate Mixed Development	Small Housing Development	Town Centre Apartments
Melpas & Bettws					
Greenfield	£147	£166	£165	£182	-£185
Brownfield	£114	£132	£131	£149	-£201
Newport East					
Greenfield	£105	£126	£123	£145	-£256
Brownfield	£73	£89	£87	£117	-£266
Bag/Newport West					
Greenfield	£86	£86	£75	£106	-£116
Brownfield	£30	£46	£40	£58	-£234
Caerleon/Rural					
Greenfield	£84	£87	£91	£124	-£278
Brownfield	£49	£61	£57	£88	-£295

1.7 The CIL Assessment tests five different scenarios for both brownfield and greenfield sites. The highest capacity tested is a 100 unit development and the lowest a 2 unit apartment scheme. When this is compared with the allocations within the LDP, it is clear that the LDP is predicated on a much wider range of sites. As such, there are concerns that the typologies tested are not wholly representative of the typologies that are proposed in the LDP and this has the potential to distort the viability results. It is particularly important that the impact of CIL on larger strategic sites is examined as these sites are subject to large up-front costs including promotion and infrastructure costs.

The typologies have been revised to acknowledge the apartments are unlikely to come forward as part of mixed housing schemes in the plan period. In addition more scale tests have been undertaken to consider the CIL potential of larger sites up to 1000 units.

1.8 From the table at 1.5 above, viability appears to improve, the smaller the scale of development and conversely worsens, the larger the site. In all scenarios, the mixed residential development typology (100 dwellings) is the worst in terms of viability. Based on this pattern, viability for development sites larger than 100 units (which represents 50% of all allocations in the LDP), is likely to be less viable than those identified in the above table, whereas this is not factored into the proposed residential CIL rates and may be considered as misleading. In our view, further typologies should be tested for schemes of 250,

In the original testing, the reason that the larger scale test appears worse in terms of viability is that it contains apartments – not because it is larger scale.

The revised testing for mixed housing of various scales confirms that larger residential sites have similar CIL

	500, 1,000 and 4,000 dwellings, which would represent the mix of allocated housing supply.	potential
	1.9 It's therefore important that an appropriate range of site typologies, reflective of the development land supply, is tested. It is also necessary to strike an appropriate balance between the desirability of funding CIL (in whole or in part) and potential effects of CIL on the economic viability of development across the area. This is important, as a "three way trade off" occurs between affordable housing, CIL and Section 106.	Please see above comments
	<p>2. Strategic Sites</p> <p>2.1 It is noted in the Infrastructure Development Plan (IDP) that where a site is of a sufficient size to generate the need for an on-site new school, it is likely that direct provision by the developer would be sought through a Section 106 Agreement. The typologies do not assess sites of any real scale, and particularly not the scenario where significant infrastructure or site mitigation S106 works (such as a new school provision) are required. As a result, it is totally unclear from the evidence base whether larger or strategic sites are capable of delivering the proposed CIL charge and the Consortium question whether it would be appropriate to treat strategic sites differently.</p>	It is understood that large scale infrastructure (such as provision of a new school) is unlikely in connection with any CIL affected large scale site in the plan period
	2.2 The viability assessment does not test any site in excess of 100 units. Sites of significant scale will have much higher infrastructure requirements and/or enabling/opening up costs. They are much more likely to require significant costs in terms of site specific Section 106.	The revised testing cover sites of 200,300, 500 and 1000 units
	2.3 The introduction of CIL as a means of capturing land value uplift to fund infrastructure is considered to be an effective mechanism for smaller developments where there is a limited impact on infrastructure and little or no on-site provision.	Noted
	2.4 The Consortium strongly believes that Section 106 agreements only should be used on any strategic site with a £0 per sq m residential CIL rate applied. Such an approach would provide clarity in terms of the infrastructure delivery	Needs specific viability evidence to support such an approach

	<p>mechanism and also ensure its delivery in a timely manner through bespoke Section 106 agreements. The risk of ‘double dipping’ could be removed through a clear demarcation between CIL and Section 106. This is an approach that has been adopted by other local authorities in the UK.</p>	
	<p>3. The Viability Inputs</p> <p>3.1 Build costs – As part of the evidence base, Gleeds have produced a construction cost study which identifies a median construction cost of £879 per sq m for standard residential to Code Level 3. In addition, they apply an additional £20 per sq m for the extra credit which is required in Wales. It appears from the “Residential Viability Appraisal’s” appended to the CIL Assessment that this additional cost is not allowed for in the appraisal. As such, the construction cost in each appraisal should be amended to take account of this additional cost. Including the additional £20 per sq m places the build cost at a very similar level to the median BCIS cost rebased for Newport (£896 per sq m), which is an accepted source of build cost data.</p>	<p>The £20per sqm has been added to construction costs in the revised testing. The proposed CIL rates have been adjusted in accordance with the revised results</p>
	<p>3.2 Interest Rates – A finance rate of 5% is targeted in the viability appraisal. The Consortium considers this to be too low. The RICS in their April 2015 research publication “<i>Financing Viability Appraisal in Planning Decisions: Theory and Practice</i>” confirms that the rate used appears non contentious with 7% adopted in four out of five cases where it is mentioned. It is therefore considered that the interest rate should be increased to 7%.</p>	<p>Disagree – construction finance is becoming more competitive and we also include 1% arrangement fees</p>
	<p>3.3 Development Periods – In all appraisals, it appears that a 12 month development period is applied, which is considered totally inadequate. For a brownfield development of circa 100 units, we would estimate a construction period of at least 24 months (and longer where site preparation is required) and a similar period for sales (3-3.5 sales a month), commencing approximately 6 months after construction commences. This provides a total development period of at least 30 months (2.5 years).</p>	<p>The development period is intended to reflect how long costs are ‘carried’ and therefore attract interest. The 18 month ‘cycle’ in the appraisals is considered reasonable,</p> <p>Where periods are longer interest costs will be off-set by sales income after 9-12 months</p>

	<p>3.4 Abnormal & Opening Up Costs – The CIL Assessment acknowledges that most development will involve some degree of exceptional or “abnormal” construction cost yet the appraisals make no allowance for “abnormal” or “opening up” costs. Instead, NCS recommend that CIL rates are set within identified viability margins by applying a “reasonable buffer” (between the maximum available for CIL and the proposed CIL rate) to allow for additional site specific abnormal costs. We comment in more detail on this point in Section 5.</p>	<p>Noted (please see Section 5)</p>
	<p>3.5 Garages – The unit sizes for each dwelling type adopted within the CIL Appraisal are considered reflective of the Net Sales Area (NSA) for new housing product delivered in the region. However, garages are not included within the definition of NSA. CIL is calculated on the Gross Internal Area (GIA) of the private dwellings, which will include garages. Assessing the residual for CIL based on the NSA is therefore an incorrect approach and garages should be allowed for when calculating the amount available for CIL as this will decrease the amount actually available. We do not believe that the CIL Viability Assessment adequately accounts for this.</p>	<p>The additional value generated by garages is considered to be broadly offset by the additional costs so this is not considered to be an issue</p>
	<p>3.6 Section 106/278 Costs – The CIL Assessment includes an allowance of £1,000 per dwelling to reflect future planning obligations. It is not clear how this figure has been derived and we are concerned that it is too low, when read alongside the IDP list of types of infrastructure likely to be sought either in part or whole by either CIL or Section 106.</p>	<p>£1,000 is considered sufficient to cover S106 and S278 costs</p>
	<p>The Viability Appraisal also makes no specific allowance for Section 278 contributions but assumes any costs will be covered in the £1,000 per dwelling Section 106 cost. Section 278 contributions typically cover traffic calming measures, provision and improvement of junctions and improvement of facilities for pedestrians and cyclists.</p>	<p>£1,000 is considered sufficient to cover S106 and S278 costs</p>
	<p>With regard to larger strategic sites, this cost will be significant. The Viability Appraisal report has therefore not adequately assessed the impact Section 278 contributions will have on viability</p>	<p>£1,000 is considered sufficient to cover S106 and S278 costs</p>

	<p>4. Benchmarking threshold land value</p> <p>4.1 In principle, we are in agreement with the basis of establishing threshold land values for benchmarking purposes, particularly in relation to the checks made against market sales comparisons. However, it must be remembered that the comparable land sales data will have already allowed for the cost of current S106 obligations and as such, there is the potential for an element of double counting (or underestimating the threshold land value) as a result of this, and for this reason we believe that the landowner share in uplift when comparing it with comparable land sales should be higher than 50% of the gain to cater for this element of double counting.</p>	<p>Disagree: Market comparable rates are not used to establish CIL rates in the study – only the greenfield and brownfield benchmarks, so this is not relevant</p>
	<p>4.3 Including apartments within the housing mix has an additional impact on the residual for CIL. This is because the floor area for apartments are not included in the assessment (as the study already concludes that it is unviable to develop apartments and pay a CIL charge), and therefore, the residual for CIL is inflated, whereas if these units were changed for houses, they would be included in the CIL calculation and would have the effect of reducing the maximum amount available for CIL (and other development costs).</p>	<p>Disagree: Actually it's the other way round. Apartments have been removed from the revised mixed housing tests and CIL viability increases</p>
	<p>4.4 We consider therefore that the mix should be adjusted to remove the apartments to provide a more realistic development mix, enabling a more equitable assessment of the residual for CIL.</p>	<p>Revised tests have been undertaken</p>
	<p>4.5 To demonstrate this, we have taken the example of a 100 unit housing scheme (no apartments) on a greenfield site in the Malpas & Bettws zone. Based on standard densities of 37 dwellings per net hectare (15 dwellings per acre), a 100 unit scheme would require a site of 2.7 hectares (6.6 acres). Adopting the land values in the NCS report, we estimate a land value in the order of £1.8m as opposed to the £1.67m adopted in the appraisal. The corresponding impact would be a reduction in the amount potentially available for CIL (and other development costs) of approximately 13%, with all other matters being equal.</p>	<p>Need to see the evidence but the land value increase would be more than off-set by the reduction in apartment build costs and enhanced housing values</p>

	<p>5. Do the proposed CIL rates provide a sufficient buffer?</p> <p>5.1 It is clear from the table set out at 1.5 above that three of the brownfield typologies at Caerleon/Rural are unable to support the proposed CIL rate of £60 per sq m whilst at the same time providing any buffer.</p> <p>5.2 It is also clear from the table that viability improves as sites get smaller, meaning that sites of more than 100 units are likely to be more impacted by CIL. The LDP is predicated on a brownfield strategy and the CIL results are worst for brownfield sites. It is therefore unlikely that based on this pattern and other comments within this report, brownfield sites in excess of 100 units will be able to support the proposed CIL rate of £60 per sq m in any zone, with the possible exception of most development scenarios tested in Malpas & Bettws (the lower affordable housing zone), whilst providing a suitable buffer to cater for any abnormal development costs</p>	<p>It is understood that all significant development in this zone is anticipated to be greenfield</p> <p>The results do not reflect this – only the presence of non-viable apartments in the original mixed use tests</p>
	<p>5.3 Not only are the maximum residential CIL rates identified in the table at 1.5 available for funding CIL but as confirmed in the Viability Assessment it is also required to fund any abnormal development costs. The CIL Assessment acknowledges that most development will involve some degree of exceptional or “abnormal” construction cost. The Gleeds assessment identifies that “typical” abnormal costs (excluding demolition) average £200,000 per hectare, although there is no evidence provided to support this view. The consortium contend that based on their experience of development in South Wales, this is much lower than is the case in practice. At Appendix 1 [<i>appendices are set out below</i>], we have provided further evidence from ARUP and Integral Geotechnique, both well respected companies who have a wealth of experience in remediating sites for residential development across South Wales, which supports this view</p>	<p>The Gleeds report provides a schedule of costs in the event that site specific tests are undertaken in the study where abnormal cost constraints are identified. This was not done in the Newport Study</p> <p>These are not intended to be applied as a ‘matter of course’</p> <p>The examples provided are ‘site specific’ and do not appear to represent any specific sites being promoted in Newport. It would be wrong to make generalised assumptions about abnormal costs as a means of depressing CIL rates. Generally where abnormal costs are identified that are required to bring land up to a ‘developable’ state, they are deducted from the land value in any event</p>

	<p>5.4 As already acknowledged, previously developed land has historically played an important role in housing land supply within Newport and will continue to represent an important source of supply going forward. The redevelopment of previously developed land is more likely to be burdened by explicit and known additional non-standard development costs, particularly in relation to demolition and decontamination.</p>	<p>Noted</p>
	<p>5.5 The buffer therefore between the maximum amount of CIL and the proposed rate needs to provide for these additional development costs. It is evident from page 8 of the Gleeds report that they are basing their costs on one net hectare being able to deliver 35 dwellings. At 1.18 of the CIL Assessment, an average dwelling size of 90 sq m is adopted. Using these assumptions, we estimate that average abnormal costs amount to £63.49 per sq m of Net Sales Area.</p> <div data-bbox="618 652 1368 959" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>35 units x 90 sq m (ave) = 3,150 sq m per hectare</p> <p>Average abnormal cost = £200,000 per hectare</p> <p>3,150 sq m</p> <p>Average Abnormal Cost = £63.49 per sq m</p> </div>	<p>The Gleeds report does not identify an 'average abnormal cost'. It identifies a series of abnormal cost allowances per Ha in the event that a specific abnormal cost constraint is identified in site specific assessments</p> <p>The calculation is therefore incorrect as a general assumption</p>
	<p>The table below demonstrates the impact on the residual for CIL after the average allowance for abnormal development costs (as identified by Gleeds) is deducted from the maximum amount available for CIL.</p>	<p>As above</p>

	Mixed Residential Development	Medium Sized Mixed Development	Intermediate Mixed Development	Small Housing Development
Maipas & Bettws				
Greenfield	£83	£97	£95	£112
Brownfield	£48	£63	£62	£80
Newport East				
Greenfield	£35	£48	£45	£66
Brownfield	£3	£12	£9	£34
Rog/Newport West				
Greenfield	-£21	-£7	-£12	£18
Brownfield	-£39	-£43	-£46	-£19
Caerleon/Rural				
Greenfield	-£15	-£3	-£8	£27
Brownfield	-£53	-£39	-£44	-£10

5.7 This demonstrates that in most cases the buffer, based on the proposed CIL levels is insufficient to cater for any additional development costs. The Council acknowledge that most development will involve some degree of exceptional or “abnormal” construction cost and this should be reflected in setting the proposed CIL rate.

Incorrect assumption

6. Effective operation of CIL

6.1 Despite the narrow scope of the examination, we urge the Council to make clear at the earliest opportunity, the supporting documentation needed to operate CIL and to make it available for consultation. Practically, this needs to be done as soon as possible, so that participants and stakeholders are able to comment on the effective operation of CIL. Whilst this support and information is not tested at examination, this information is critical to allow for successful implementation of CIL and to demonstrate that the CIL has been prepared positively and supports sustainable development.

Not Examination Issues, but support information to be provided

6.2 The documentation should include:

- guidance on how to calculate the relevant chargeable development/level of CIL;
- guidance on liability to pay CIL/appeals process;
- policy for payment by instalments;
- approach to payments in kind;

Not Examination Issues, but support information to be provided

	<p>· guidance on relief from CIL and the policy on exceptional circumstances for relief from CIL.</p>	
	<p>6.3 With regard to Discretionary Relief and Exceptional Circumstances Relief, Savills does not consider there to be any detriment arising from the Council making available such reliefs as part of its are strict tests surrounding the availability and applicability of Exceptional Circumstances Relief. It would therefore only be applicable to those schemes that can justify the need for it and meet those strict tests.</p>	<p>Not Examination Issues</p>
	<p>6.4 Our clients therefore consider it imperative that the Council make both Discretionary and Exceptional Circumstances Relief available from the adoption of CIL. We would therefore ask that relief is included in the Charging Schedule and that the intended approach for doing so is outlined at the DCS consultation stage.</p>	<p>Not Examination Issues</p>
	<p>6.5 Our client is concerned that the Council have not published an instalments policy. It is important that the timing of delivering development is considered to ensure that the CIL does not put any unnecessary pressure on cashflow and viability.</p>	<p>Not Examination Issues</p>
	<p>6.6 We believe that there should be an overriding mechanism which, in certain situations, should the CIL payments threatens the viability, and thus the deliverability of the scheme proposed, can be negotiated and agreed on a one to one basis. This is in line with the PPG which states: <i>“An instalment policy can assist the viability and delivery of development by taking account of financial restrictions, for example in areas such as development of homes within the Buy-to-Let sector. Few, if any developments generate value until they are complete, either in whole or in phases.”</i>²</p> <p>6.7 The CIL Regulations now allow for Payment in Kind through the provision of infrastructure. However, there remain notable deficiencies in the operation of CIL, caused primarily by the CIL Regulations, which places the Council and the</p>	<p>Not Examination Issues</p>

² Paragraph 055 reference ID – 25-055-20140612, Planning Practice Guidance, Revision Date 12 June 2014

	<p>development industry in a difficult position.</p> <p>6.8 The scope to reduce the CIL liability via utilisation of Payment in Kind is therefore restricted to those items of infrastructure which are not required to mitigate the impact of a development, which for strategic sites would exclude most (if not all) site-specific and ‘scheme mitigation’ infrastructure.</p> <p>6.9 Payment in Kind is therefore not a credible option, which further emphasises the need to ensure that the Regulation 123 List does not include any items of infrastructure intended to be delivered through Section 106 agreements on strategic sites.</p>	
	<p>6.10 The CIL Guidance states that charging authorities ‘<i>must keep their Charging Schedules under review</i>’³ to ensure that CIL is fulfilling its aim and responds to market conditions. The Consortium therefore requests that regular monitoring is undertaken by the Council to ensure that any detrimental impact of CIL on housing delivery is noticed promptly and remedied. A review period of between 2-3 years from adoption, or sooner if there is a substantive change in market conditions or Central Government policy, should be publicly committed to by the authorities.</p>	Not Examination Issues

³ Ibid. Paragraph 044, Reference ID 24-044020140612, CIL Guidance (2014)

	<p>Conclusion</p> <p>Based on this representation, the Consortium urges the Council to review the viability evidence and CIL Charging Schedule. Once the viability work has been reappraised we believe there are grounds to amend the Charging Schedule and our principle areas of concern requiring consideration are summarised below:</p> <ul style="list-style-type: none"> • Given the Brownfield strategy of the Council, CIL rates should be set based on the results of the greenfield typology testing; • Additional typologies which represent the allocated housing supply of the city should be tested; • Consideration should be given to applying a £0 CIL rate to strategic sites; • A number of the viability inputs should be reviewed; • CIL is calculated on GIA, and as such, garages should be accounted for when calculation the residual for CIL; • The benchmark land value should be reviewed; • A sufficient buffer should be allowed in setting CIL rates to account for “average” abnormal costs; • Clarity on how the Council will deal with instalments, Discretionary and Exceptional Circumstances Relief would be helpful. <p>We would welcome the opportunity to meet further with the Council and its CIL advisors in order to review the evidence and address the concerns raised as soon as appropriate.</p>	<p>No evidence submitted to support this and please see above comments</p>
<p>Gwent Wildlife Trust</p>	<p>Gwent Wildlife Trust welcomes the inclusion of Green Infrastructure within the Draft Infrastructure Plan, and the recognition that <i>‘Investment in green infrastructure is necessary to mitigate the potential impacts of growth’</i>. Green infrastructure is a reservoir for biodiversity, which provides numerous ecosystem services such as opportunities for recreation and education, clean air and water, noise and dust suppression and many more.</p>	<p>Noted</p>

	<p>We support the investment of CIL income on provision and enhancement of green infrastructure, and welcome consideration of the wide range of projects and schemes that will benefit green infrastructure and biodiversity. These represent a significant step in fulfilling the council's 'biodiversity duty' under the NERC Act (2006) and under consideration within the Environment (Wales) Bill.</p> <p>We also welcome clarification that developers are still expected to provide public open space within new developments. It may also be helpful to clarify that developers will still have biodiversity obligations required by local and national policy, such as the requirement to deliver net biodiversity gain. Developers should view these as complementary, and we expect the council to provide developers with guidance as to how their on-site provision can complement strategic plans for Green Infrastructure.</p>	
	<p>We are disappointed therefore, that all of the Green Infrastructure projects are considered to be 'Third Priority' – something beneficial but not necessary. This is at odds with the statement earlier in the document, and shows a lack of commitment to delivery of projects. Given that the NERC duty is likely to be strengthened through the Environment Bill, the council needs to be aware that paying lip service to biodiversity is not adequate.</p>	Noted
	<p>Firstly, many of the projects suggested are not discrete and many are continuous processes, rather than one-off projects. Some, such as land management, are already taking place, albeit not to the scale that is needed to maintain and enhance the Green Infrastructure network. It is likely that the council can obtain part funding for some, through grants and partnership working, so the deficit can be reduced. We look to CIL to provide important match funding to enable the council to access certain funding streams.</p>	Noted
	<p>We would therefore like to make the following recommendations for the Draft Infrastructure Plan and CIL spending.</p> <ul style="list-style-type: none"> • A standard percentage of CIL, with a set minimum budget, to be allocated to Green Infrastructure. This will enable planning of departmental work, and provide match funding for grants. • Green Infrastructure projects to be given higher priority within the Draft 	Noted but CIL spending prioritisation will be directly related to the delivery of the LDP

	<p>Infrastructure Plan, and ranked priority within themselves.</p> <ul style="list-style-type: none"> As CIL is unlikely to fund all of the projects, more work is needed investigate the opportunities for income from other sources – grants, business sponsorship, and cross-departmental working and partnership working with other organisations. <p>Thank you for consulting Gwent Wildlife Trust. If you have any queries or require further information, please let us know.</p>	
Savills on behalf of St Modwens Developments Ltd	<p>Savills provides planning advice to St. Modwen Developments Limited ('SMDL'), on its Glan Llyn scheme in East Newport. We have been asked to review the Draft Charging Schedule and Infrastructure Plan for Newport's CIL and make comments.</p> <p>The Council will be familiar with the commitment that SMDL has made to the City at Glan Llyn and the progress that has been (and is being) made there. Its importance as a source of new homes and as a major economic development project is understood and recognised. The whole scheme has outline planning permission already and it is highly unlikely that it will come into contact with the CIL regime if it is pursued to adoption in Newport. For a number of reasons though we need to ensure that the impact of CIL as proposed on the site and the scheme is properly considered, just in case the planning position changes.</p>	Noted
	<p>Building on the continuous review of scheme performance, it is clear that the Glan Llyn project could not afford any CIL payments. The reasons are obvious. It is a very large project on one of Wales' largest previously developed sites. Substantial physical and social infrastructure has to be provided (at no public cost), together with significant up front work to prepare the site for redevelopment. As we know, this does not mean that transformational and sustainable redevelopment cannot take place (it clearly can), but it does mean that care needs to be taken with respect to development viability. The current work we are doing on the scheme underscores this point.</p>	Noted
	<p>On this basis, and as a contingency against potential future interaction with CIL, we propose that the Glan Llyn site is excluded from the CIL charging</p>	There is no evidence to support a differential rate for this site and therefore

	<p>schedule (or given a zero rate). This reflects the intelligence we have on the site and which we are discussing (but which remains confidential at this time). It follows practice and experience on other strategic sites around the UK as well (which is in itself a response to the very blunt tool that CIL is). Importantly it also matches the Draft Infrastructure List which includes no items (to be funded by CIL) which are triggered by or associated with the Glan Llyn scheme.</p> <p>Indeed Glan Llyn is making its own provision for primary and secondary education (which together add up to nearly 90% of the funding identified in the draft Infrastructure List).</p>	no justification under the CIL Regs
	<p>On this basis alone there is no case to charge CIL on Glan Llyn. This applies especially to residential development which is the key value generator – but also to the commercial (retail) development that is proposed as part of the local centre. It is clear that this will have a different priority and different performance to the retail space anticipated in the charging schedule – and will need to be attracted to the site. Charging CIL on it could therefore have a potentially significant and unanticipated (and unintended) impact.</p>	There is no evidence to support a differential rate for this site and therefore no justification under the CIL Regs
	<p>Others will investigate the science (or maths) behind the charging schedule. Our review reinforces the need to avoid the standardisation of development performance that CIL applies (or implies). The values deployed require special attention as both quantum and methods or stages of payment need to be factored into the development economics of large schemes. Equally the costs allowed for typical abnormal costs look alarmingly low (in our experience). Both have a major impact on CIL expectation and impact.</p> <p>As we say, we do not expect that Glan Llyn will be touched by the CIL regime if it progresses, but we do please ask that for the reasons set out in this short submission it is expressly excluded from the charging schedule.</p> <p>I trust this is clear and I look forward to receiving confirmation that our comments have been received in due course.</p>	Anecdotal with no evidence to justify an alternative approach
Savills on behalf of	Savills are instructed to make representations on the above Retail	Noted

<p>Axa Real Estate Management and Otium Real Estate</p>	<p>developers/landowners within the City. This letter expands upon, and should be read in conjunction with, the comments form.</p> <p>Our comments on the CIL draft schedule are related to the following:</p> <ol style="list-style-type: none"> 1. Objection to the £100 per square metre CIL charge for all forms of retail development 2. General comments on the need for clarity on CIL infrastructure and the instalments policy 	
	<p><u>Objection to the setting of a rate for retail development</u></p> <p>Retail development is recognised by PPW under Chapter 7 as being a form of economic development. Paragraph 7.1.1 states that development that generates wealth, jobs and income is considered as economic development, specifically including retail.</p> <p>At 7.1.2 it goes on to state that it is essential that the planning system considers, and makes provision for, the needs of the entire economy and not just those uses defined in parts B1 to B8 of the Use Classes Order. Paragraph 7.1.3 states that the planning system should support economic development and employment growth alongside social and environmental considerations within the context of sustainable development. To this end, the <i>planning system</i>, including planning policies should aim to ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses. Wherever possible, LPAs are encouraged to seek to guide and control economic development (including retail therefore) to facilitate regeneration and promote social and environmental sustainability.</p> <p>The concern is that the setting of the CIL rate proposed for retail could damage the potential for a key form of physical regeneration and employment opportunities within the City.</p>	<p>No evidence provided</p>
	<p>In parallel to this, there is no evidence presented to demonstrate why retail</p>	<p>Based on viability assessment evidence</p>

	<p>uses should contribute the same level of CIL payment towards infrastructure as residential uses.</p>	<p>and the potential viability margins demonstrated</p>
	<p>The need for infrastructure in relation to homes is, broadly speaking, far greater than that related to retail development. Whilst large scale retail developments will have impacts upon the highways network, they typically provide for upgrades to local highways infrastructure through S106 payments. Whilst it is understood that strategic highways contributions will be replaced by CIL, impacts upon the local highways network will continue to be paid for through S106.</p> <p>Retail developments do not generate need to provide education, public open space, libraries, healthcare and social facilities or other forms of infrastructure outlined within the background documents.</p> <p>In short, the impacts of retail developments tend to be more localised and relate to highways infrastructure that would ordinarily (and in many case continue to be) funded through S106 payments.</p>	<p>This misunderstands how CIL works – it is ability of the development category to contribute to infrastructure requirements as a whole not the need for infrastructure resulting from the category of development</p>
	<p>To levy a charge against retail development to cover other infrastructure is not therefore considered equitable.</p> <p>Therefore, on the basis that:</p> <ul style="list-style-type: none"> • there is a risk that the CIL charge would make an important form of economic development unviable and, • that the CIL charge is not justified in relation to the impacts of retail development <p>it is our view that the CIL charge for retail should be revised.</p>	<p>As above</p>
	<p>It is our view that it forms such an important form of economic development that it should be treated on par with B1, B2 and B8 uses, i.e. that a zero charge should be levied. Localised impacts in terms of the highways network can</p>	<p>Viability assessment evidence demonstrates evidence of ability to pay CIL sum</p>

	continue to be levied through any necessary S106 payments.			
	<p><u>Other comments</u></p> <p>The consultation makes no reference to an instalments policy. An instalments policy will be essential in allowing developers to manage development viability and 'cash flow' and should be introduced and consulted upon.</p>	Not an Examination Issue		
	<p><u>Summary</u></p> <p>Savills have been asked to make representations on the draft charging schedule by landowners and developers with an interest in Newport. In summary, the following comments are made:</p> <ul style="list-style-type: none"> • There is concern that the imposition of a levy of £100 per square metre for retail development will be harmful to investment and job creation, contrary to National Policy. Retail development is recognised in PPW as economic development that generates employment. In the current economic climate, retail development is a key driver for economic growth, and therefore, obstacles such as the proposed levy should not be imposed. 	Please see above comments		
	<ul style="list-style-type: none"> • Concern is raised over the current lack of an instalments policy. <p>We would welcome the opportunity for further dialogue on the draft CIL throughout the consultation process either formally through the consultation process, or informally if further clarification of our observations are required.</p>	Please see above comments		
Daniel Mason on behalf of William Graham AM	<table border="1"> <tr> <td><i>The proposed PDCS is based on the findings of the Newport CIL Viability Report. Do you agree that the assumptions and methodology set out in this report are robust and that it represents an appropriate</i></td> <td>Yes</td> </tr> </table>	<i>The proposed PDCS is based on the findings of the Newport CIL Viability Report. Do you agree that the assumptions and methodology set out in this report are robust and that it represents an appropriate</i>	Yes	Noted
<i>The proposed PDCS is based on the findings of the Newport CIL Viability Report. Do you agree that the assumptions and methodology set out in this report are robust and that it represents an appropriate</i>	Yes			

	<p><i>basis for determining the level of CIL that would be viable in the city council administrative area?:</i></p>		
	<p><i>Do you agree with the CIL rates proposed for residential development as set out in paragraph 1.15 on page 5 of the PDCS? :</i></p>	<p>Yes</p>	
	<p><i>Do you agree with how the geographical charging zones have been defined for residential development?:</i></p>	<p>Yes</p>	
	<p><i>Do you agree with the proposal to apply a single CIL rate across the city council administrative area for A1-A3 retail uses?:</i></p>	<p>Yes</p>	
	<p><i>Do you agree with the proposal to apply a zero CIL rate to all other uses?:</i></p>	<p>Yes</p>	
	<p><i>Do you agree that the proposed CIL rates strike an appropriate balance between the desirability of funding necessary infrastructure and the potential effects of the levy on the economic viability of development across Newport?:</i></p>	<p>Yes</p>	
	<p><i>Please select one of the following::</i></p>	<p>I do not want to speak at a hearing session and am happy for my written comments to be considered by the</p>	

	<table border="1"><tr><td data-bbox="472 193 1173 280"></td><td data-bbox="1173 193 1529 280">Inspector</td></tr></table>		Inspector	
	Inspector			

**PROPOSAL TO DEVELOP CAERLEON AS A CYCLE TOURISM DESTINATION
SCOPING DOCUMENT FOR DISCUSSION**

<p>Lead organisations for the proposal</p>	<p>Caerleon Tourism Forum, Sustrans Wales Cymru Newport City Council</p> <p>Contacts:</p> <p>Lynne Richards, Newport City Council John Palmer, Sustrans Cymru Advisory Board Peter Hitchings, Caerleon Tourism Forum, Pendragon B&B, Caerleon</p>
<p>Project title and location</p>	<p>Caerleon Cycle Tourism Destination Package</p>

	<p>Location and area of interest:</p> <p>Caerleon, Newport, South Wales and the surrounding countryside</p> <p>The project would be centred on Caerleon village with links to existing and developing sustainable transport and cycling links and facilities. These facilities include:</p> <ul style="list-style-type: none"> • Connect2 cycle route between Newport City centre and Caerleon • Proposed Afon Lwyd route between Caerleon and Cwmbran linking the wider network into the Brecon Beacons • Celtic Trail Cycle Route • Wales Coastal Path • Quiet lanes within Usk valley • Proposals to improve walking and cycle connectivity and accessibility around Caerleon and its hinterland
<p>Description of the project</p>	<p>This report provides further justification and details of the actions required within the Caerleon Destination Action plan 2013 -2015, (updated March 2014) prepared by Caerleon Tourism Forum to promote Caerleon as a cycle tourism destination.</p> <p>The project would consist of a combination of hard and soft measures which would complement and enhance</p>

existing facilities.

Existing Infrastructure

- Existing Network of good off road shared use routes.(See especially 3rd Edition Newport Cycle Map 2013 - notably C2 Route to Newport City Centre, Heritage and Riverside circuits
- Mountain biking in Wentwood (some routes subject to timber extraction)
- Quiet lane network of routes connecting to Usk Valley, Wentwood and Wye Valley
- Cycle Parking – Outside Sainsbury's Local
- Celtic Manor cycling facilities etc The Celtic Manor has a wide range of leisure cycling routes within the Resort estate. It also promotes mountain biking at Cwmcarn Forrest Drive and Afon Forest Park (Port Talbot)

Accommodation, Cafes, pubs and restaurants and University of South East Wales Caerleon has a long history of the hospitality trade as a former coaching stop and market town. However, this industry has shown a significant shrinkage over recent years with the closure of a number of historic inns and accommodation providers.

Proposed Infrastructure

1. Cycle Parking: Recommendation: That provision be made and funded to Sustrans recommended standard designs by the relevant attraction and business providers (or grant through the project funding) at Roman Amphitheatre (Cadw), Roman Baths (Cadw), and Legionary Museum (NMW) Quayside Area -Hanbury Arms (Crown Estates/Brains Brewery) Doctors' Surgeries and Health Clinics

Suggested positions for additional new cycle stands:

- *Take out bollards and substitute cycle stands in the area outside the toilets next to the Town Hall*
- *Cricket Pavilion/Amphitheatre area*
- *In square/Cross Street on footway outside the Bull*
- *Within the Ffwrwm*
- *Doctors surgery/Charles Williams Endowed School area– widen footway in area subject to yellow lines between the Co-op pharmacy and Knighton Court*
- *Ponthir Road Spar*
- *Hanbury/Ship/Bell/St Julian's pubs*
- *The Roman Lodge/Stuffed Dormouse (Ponthir Road)*
- *The Greyhound, Llantrisant, The Wheatsheaf Llanhennock, Newbridge-on-Usk*

2. Cycle Hire –Further investigations are needed to checkout with existing operator at 14 locks and Newport City Centre. Potential cycle hire stations are at the Priory Hotel and University Campuses at Newport and Caerleon.

3. Proposed routes in Active Travel Newport draft report now being edited up for final version includes the first stage of the **Afon Lwyd Greenway** link from Usk Road to Forge Close). Recommendation: To ensure this and the extended Afon Lwyd Greenway via Ponthir to Cwmbran is included in relevant programmes with the cooperation of Torfaen CBC.

4. Easy quiet lane link to Wentwood - Upgrading of forest section of existing highway at Coed y Caerau needed (already supported by Forestry Commission Wales)

Recommendation: That application be made to Newport Landfill Tax Fund (via a suitable charitable body) and

other possible funds)

5. Celtic Manor - Recommendation: That discussions take place with the Celtic Manor Resort to connect their cycling facilities with the wider network.

6. Accommodation, Cafes, pubs and restaurants and University of South East Wales Caerleon has a long history of the hospitality trade as a former coaching stop. However, this industry has shown a significant shrinkage over recent years with the closure of a number of historic inns, accommodation providers and shops. It is considered that the development of the village as a cycling tourist destination can act as a catalyst for revitalising this sector and halting further decline.

7. Connections to the rail network – Whilst there is already a safe off-road link to Newport Train Station, the proposals in this report provide further justification for a new Caerleon Station. The completion of the proposed Afon Lwyd link between Caerleon and Cwmbran would provide an attractive, safe, mainly off road link to Cwmbran train station' the Monmouth and Brecon Canal, Blaenavon World Heritage Site and the Brecon Beacons National Park..

Soft Measures

- Dedicated website focussed on Caerleon as a cycle tourism destination with links to Carleon.net, local attractions, accommodation and hospitality providers.
- Niche marketing targeting areas where cycle tourism is already well established - especially some European countries where cycle tourism is well established
- Regular cycle events, linking up with established local events such as the Caerleon Arts Festival
- Arrange regular Sky Rides or similar

	<ul style="list-style-type: none"> • Market cycling/heritage packages • Engage with local schools to assist with cycle training, travel plan promotion and associated activities, such as Sustrans Wildlife Champions, to raise awareness and encourage use of the facilities
Proposed partner organisations	<p>Capital Region Tourism Visit Wales Welsh Government Cycling Wales Sustrans Cymru Cycling Touring Club</p> <p>Adjoining local Authorities:</p> <ul style="list-style-type: none"> • City of Cardiff • Torfaen County Council • Monmouthshire County Council <p>Caerleon and Newport Civic Trusts Caerleon Arts Festival Caerleon Neighbourhood Network</p> <p>Develop good practice network with comparable UK cycle, heritage and green tourism visitor destination towns</p>
Rationale for the project	<p>The time and location is right for Caerleon as a cycle tourism destination with:</p> <ul style="list-style-type: none"> • the completion of the C2 cycle route from Caerleon Bridge to the City Centre of Newport and possibility for this route to serve as a spine for a much wider leisure cycling network • the current development of the Newport Active Travel Network • the opportunity to build on and complement Caerleon's current heritage destination and hospitality activity • a growing market for "green tourism" within the UK and Europe

There is considerable volunteer experience within the Caerleon Forum Group membership to detail up proposals and assist grant applications and implementation.

Caerleon does not have the capacity to cater for a large increase in car based visitors but has the potential to be very well connected in terms of cycling/walking routes and facilities.

Caerleon is already a popular training base for a great number of sport cyclists using rural roads and lanes to Usk, Wentwood and beyond where adjoining county Monmouthshire is hosting The British Cycling Road Race Championships and sportif event in June 2014 and the course will pass Caerleon on local roads. This together with other road race events and events at the Velodrome located at the Newport International Sports Village will provide further opportunities for Caerleon to accommodate sport cycling event participants, supporters and those using local roads and the Velodrome for training. The Velodrome is the headquarters of Welsh Cycling.

Cycle Tourism is one of the most buoyant and growing sectors of the UK tourism industry as evidenced by recent research in Scotland, and the Peak District National Park. A study in 2013 by Sustrans Scotland identified the economic contribution of leisure cycling to the Scottish economy to be between £117.4m to £239.3m per annum. When combined with mountain biking the total value of cycle tourism to the Scottish economy is estimated to be between £241m to £362m per year. A study of the economic value of the Celtic Trail which traverses Newport showed that the trail generated £54m of expenditure by users in 2005.

The European Union have a target to double cycling between the years 2014 and 2020 and spending on cycling across the EU is predicted to be 6 billion Euros during this period. Many other European countries, notably Austria, Denmark, Germany and Switzerland have gained a renowned reputation in cycle tourism. The UK lags behind these countries in the provision of cycle tourism facilities but if the appropriate facilities are developed there is a large potential for attracting existing cycle tourists from these countries.

Cycle tourism helps efforts within Wales to minimise the effects of climate change, helps sustainable development and regeneration and is well suited to reducing the impacts of motor traffic on vulnerable natural and historic areas such as Caerleon and its surrounding countryside where it provides an excellent alternative form of

	<p>transport.</p> <p>Historic Caerleon is an established tourist destination but has suffered extensive shrinkage of the hospitality and retail sectors in recent years. Caerleon would be well suited to the development of an exemplary demonstration cycle tourism hub with the recent completion of the Connect 2 high quality off road route to Newport City centre and related links on low trafficked rural roads with good potential links to Wentwood and the internationally renowned Cwmcarn Forest Drive for mountain biking.</p> <p>The proposals should provide a related opportunity for regeneration and safeguarding existing businesses particularly within the Conservation Area. The proposal would provide the opportunity to review and enhance the public realm, accessibility for all travellers and traffic management of Caerleon village, especially around the one-way system.</p>
<p>Contribution of the project to other activities priorities</p>	<p>The development of Caerleon as a cycle tourism destination could:</p> <ul style="list-style-type: none"> • Provide further infrastructure to help facilitate the review and delivery of School Travel Plans, in particular Charles Williams Endowed and Caerleon Comprehensive. • Address existing and increasing health issues by widening opportunities for exercise • Improve accessibility and walkability and traffic management around Caerleon village, thereby providing a better environment for residents and visitors and potentially boost footfall for visitor attractions and businesses in the village • Encourage non-car based visitors who have been shown to stay longer and spend more money at a destination than those who arrive by car. • Provide the environment to develop a local culture of sustainable travel which could then contribute to the viability of a new railway station
<p>Relevant Strategic</p>	<p>To be considered</p>

Objective(s)	
Alignment with national and local policy	<p>Active Travel Wales Act 2013</p> <p>Newport City Adopted Local Plan ???</p> <p>Inserts needed re any other relevant Economic, Tourism Health and Transport</p>
Anticipated economic benefits	<p>To be determined</p> <p>For further discussion</p>
Impacts of not taking forward project.	<p>To be determined</p> <p>For further discussion</p>
Funding profile and source	<p>To be determined</p> <p>For further discussion</p>
Details on funding and leverage	<p>To be determined</p> <p>For further discussion</p>
Key milestones for implementation, monitoring and evaluation	<p>To be determined</p> <p>For further discussion</p>

Barriers to delivery	None identified to date.
Any other comments	None identified to date.

APPENDIX 1 cont. – House builders consortium

Intégral Géotechnique

Intégral House
7 Boddau Way
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Caerphilly
CF83 2AX
Tel: 029 2060 7001
Fax: 029 2066 2176
mail@integralgeotec.com

VZ/JL

22 October 2012

Planning and Policy Adviser - Wales
Home Builders Federation
PO Box 2512
Cardiff
CF23 0GB

For the attention of Mr Richard Price

Dear Sir,

Brownfield Sites – Remediation/Reclamation Cost Estimates

We have been approached by a number of major house builders in South Wales to write and confirm to you typical costs for the remediation/reclamation works of brownfield sites.

For many years our company has been acting as the Geotechnical and Geoenvironmental Consultant to a great number of house builders for the regeneration and redevelopment of brownfield sites. We have a good track record for dealing with many types of brownfield sites including iron and steelworks, chemical works, scrap yards, shipyards, railway sidings, disused factories, colliery sites, mine spoil heaps, gasworks, landfills, paint and tar works etc.

The typical remediation/reclamation cost per acre depends on the following:

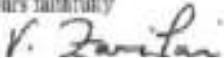
1. The size of site (the smaller the site, the higher the cost per acre).
2. The type/category of the sites historic use.
3. The level of risk that the site poses to the environment (e.g. if the site is adjacent to a river or near to controlled waters, then there is a potentially high risk of environmental impact).

However from our experience, the reclamation/remediation costs, including the demolition of disused buildings, could vary between typically £100k and £250k per acre. In the case of highly and extensively contaminated sites such as oil refineries and tin plants, the remediation costs could be much greater than £250k per acre.

In addition to the above remediation/reclamation costs, many brownfield sites have additional abnormal development costs associated with the need for other requirements such as piled/rocked concrete soil foundations, ground gas protection barriers, importation of clean subsoil/topsoil etc.

We trust that the above is a useful guide. If you should have any queries or require any further information, please do not hesitate to contact us.

Yours faithfully



Evidence from HBF members on the average cost of remediating sites and addressing abnormal constraints

Developer no.1

- Site 1 - A former steelworks - £263k per acre.
- Site 2 – Industrial site without contamination - £130 per acre.
- Site 3 - Site in Aberdare including raising site - £205k per acre.
- Site 4 - Site in the Vale of Glamorgan - approx £400k per acre.
- Average £250k per acre

Developer no.2

Sites are relatively straightforward and some have benefited from prior remediation

- Site 1 - Park Road - £115k per acre
- Site 2 - Bagworth - £134k per acre
- Site 3 - Cleobury Mortimer - £147k per acre
- Site 4 - Yately - £169k per acre
- Site 5 - Humberstone - £227k per acre
- Average - £159 per acre

Developer no.3

- £250k per acre is reasonable

Developer no.4

- Site 1 – Former factory, contaminated site - £439335 per acre
- Site 2 – Sloping site, largely made ground - £192908 per acre
- Site 3 – Sloping greenfield site - £164500 per acre
- Average - £265581 per acre

Your ref
Our ref
File ref

ARUP

By Post & Email

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For the attention of Richard Price

Dear Sir

Brownfield Sites - Remediation/Reclamation Cost Estimates

Along with Integrale Geotechnique we have been approached by a number of major house builders in South Wales to confirm to you typical costs for the remediation/reclamation works on brownfield sites.

Arup has been involved in the remediation and redevelopment of many of the brownfield sites in South Wales. We have assisted a number of clients e.g. BP, ABP, Welsh Development Agency, in the investigation and development of remediation strategies for approval by the relevant Authorities; subsequently the detailed design, construction supervision and validation of the remediation works. Many of these sites have been or will be developed for housing such as Rhoose Point, Waterfront, Barry, Coed D'Arcy, Maesteg Washery and Llanild.

We have successfully developed remediation proposals to address various types and quantities of contamination using appropriate methods agreed with the regulatory authorities.

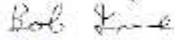
Due to this variation in the nature of the contamination methods used the consequent cost varied from site to site. This cost was also affected by the size of the site (smaller the site, the higher the cost per acre), the historic use of the site and the risk posed to the environment. Reclamation/remediation costs for sites where residential development was proposed were generally higher than for other uses, particularly where domestic gardens were proposed.

As such, from our experience, the reclamation/remediation costs, including demolition of disused buildings varied between typically £100K to £250K per acre. In exceptional circumstances with highly contaminated sites the remediation costs could exceed £250K/acre.

The above costs do not include for special measures to be incorporated by the developer to address the specific ground conditions. Based on an average of 15 units per acre, a typical cost per acre for

If you require further clarification or information please contact us. Hopefully the above provides a reasonable guide.

Yours faithfully


Bob Irvine
Director

Appendix 2 – List of Consultees

Recipient	Email address
Elected Members	Outlook Address Book 'Members' group
Community Council	Bishton - j.idavies@tiscali.co.uk Coedkernew- heather.boswell@btinternet.com; Goldcliff - goldcliffcc@gmail.com; Graig - clerk@graigcc.co.uk; Llanvaches - l.g.morgan01@btinternet.com Llawern - Mike@Llanwern.com Langstone - Heather Jones <clerk@langstonecommunitycouncil.org.uk> Marshfield - Gerald Thomas (marshfieldcommunitycouncil@googlemail.com); Michaelstone Y Fedw - catherine@graigview.co.uk Nash - angelacox@yahoo.co.uk Penhow - morgam1485@tiscali.co.uk Rogerstone - rogerstonecc@gmail.com; Redwick - carol.preece@talktalk.net Wentlooge - wentloogecc@live.co.uk ; cleark@ponthircommunitycouncil.gov.uk
Neighbouring Local Authorities	Cardiff - JClemence@cardiff.gov.uk; Caerphilly - kyter@caerphilly.gov.uk; Torfaen - robert.murray@torfaen.gov.uk; Monmouthshire - markhand@monmouthshire.gov.uk;
Welsh Government	Planning Division - Planning.Division@Wales.GSI.Gov.UK; Candice (SF - Housing&Regen-Planning) Coombs (Candice.Coombs@Wales.GSI.Gov.UK); Property Section - paul.evans4@wales.gsi.gov.uk;
Local Planning Agents	info@afa-architects.co.uk; Mail@asbriplanning.co.uk; dtbdesign@btinternet.com; chrisj@cjprojects.co.uk; Jeff.murray@cfw-architects.co.uk; lc@townplanning.org.uk; chriswaterworth@cwarchitects.co.uk; nigel@designmanagementpartnership.com; derekprosserassoc@gmail.com; c1lbigmore@btinternet.com; info@kwdorrington.co.uk; dtbdesign@btinternet.com; Jo.davies@gvagrimley.co.uk; suehopton@tiscali.co.uk; Lt.architects@btconnect.com; Mike-otton@tiscali.co.uk; crowth@lineone.net; mark@maisondesign.biz; brian@musker-sumner.co.uk; Fred.jones@fairlake.co.uk; Mark.farrar@powelldobson.com; steve@smalimited.co.uk; richard@rpduk.com;

	<p>Steve-groucott@hotmail.com; andrewthraives@btconnect.com; architects@willdig-lammie.co.uk; mlyarch@hotmail.com; tgent@savills.com; <u>nsc@ukcharities.com</u>; Simon Barry (simonbarry@boyerplanning.co.uk); carolyn.jonesplanning@gmail.com; andy.muir@btconnect.com; geraint@gjplanning.co.uk; arfon@mangoplanning.com; cardiff@wyg.com; info@dppukltd.com; <u>ballD@rpsgroup.com</u>; <u>aweeks@savills.com</u> <u>pjwilliams@savills.com</u> <u>hdavies@nlpplanning.com</u></p>
Home Builders Federation	Mark Harris <mark.harris@hbf.co.uk>
Newport Chamber of Commerce	info@newportchamberoftrade.org.uk;
Business Improvement District	Email sent <u>tolaura.smith@themeans.co.uk</u> to send to members of BID
Retailers	<p>Sainsbury's - peter.waldren@wyg.com Tesco - huw.jones@dpp-ltd.com Morrisons - planning@peacockandsmith.co.uk Asda - rpsca@rpsgroup.com Lidl - bridgend.property@lidl.co.uk;</p>
Civic Societies	<p>Newport - nsc@ukcharities.com Caerleon- mike singleton <mike.d.singleton@gmail.com>;</p>
Newport Norse	Donald.Waters@newportnorse.co.uk; Lyndon.Watkins@newportnorse.co.uk;
Utility Companies and Infrastructure Providers	<p>Ofwat - mailbox@ofwat.gsi.gov.uk; Dwr Cymru - rhidian.clement@dwrcymru.com; Mobile - fiona.kadama@monoconsultants.com; Western Power - awood@westernpower.co.uk; National Grid - julian.austin@amec.com Network Rail - townplanningwestern@networkrail.co.uk; Stagecoach - richard.davies@stagecoachbus.com; Sustrans - <u>info@sustrans.org.uk</u>; Newport Transport - <u>chris.blyth@newporttransport.co.uk</u>; Tidal Lagoon Power - <u>Catrin.jones@tidallagoonpower.com</u> BT- ann.beynon@bt.com</p>
NHS	<p><u>general.enquiries@wales.nhs.uk</u>; <u>publichealth.environment@wales.nhs.uk</u>; Andrew.Walker2@wales.nhs.uk; chris.hopper@gwent.wales.nhs.uk;</p>
Environmental Groups	<p>RSPB - mike.webb@rspb.org.uk; GWT- sjones@gwentwildlife.org;</p>
Police	nick.haynes@gwent.pnn.police.uk;
Crown Estate	andrew.nutt@thecrownestate.co.uk;

Federation of Master Builders	IfanGlyn@fmb.org.uk;
Sports Council	planning@sportwales.org.uk ; gordon.clark@scw.org.uk ;
Port	cgreen@abports.co.uk
Community Land Advisory Service	lucie@communitylandadvice.org.uk ;
Commercial Property Agents	oyoung@alderking.com ; tom.rees@hansteen.co.uk ; enquiries@burnettdaviesletting.co.uk ; info@coark.com ; christopher.newport@davisandsons.net ; info@dtz.com ; lorraine.nolan@fletchermorgan.co.uk ; jfuntek@geraldeve.com ; john.townsend@gva.co.uk ; jane@EJHales.co.uk ; info@hmy.co.uk ; info@hutchings-thomas.co.uk ; smatheson@lsh.co.uk ; enquiries@m4pc.co.uk ; jperry@middletonperry.co.uk ; web@nuttallparker.com ; newport@newlandrennie.com ; info@parryscommercial.co.uk ; robert.brophy@bnpparibs.com ; david@emanuel-jones.co.uk ; surveys@williamgrahamandco.co.uk ; kathryn.williams@eu.jll.com ; cardiff@knightfrank.com ; jackie@linnellspc.co.uk ; dave@eizie.net info@centreforbusiness.co.uk ; kscholtz@alderking.com ;
Council Officers	Highways - Carl Jones < Carl.Jones@newport.gov.uk >; Education - Amanda B Davies < AmandaB.Davies@newport.gov.uk >; Leisure - Mike McGow < Mike.Mcgow@newport.gov.uk >; Regeneration - Rob Frowen < Rob.Frowen@newport.gov.uk >; Environmental Health - Michelle Tett < michelle.tett@newport.gov.uk >; Jonathan Keen < Jonathan.Keen@newport.gov.uk >; Drainage and Flood Risk - Matthew Jones < Matthew.Jones@newport.gov.uk >; Housing - Sally Davies < Sally.Davies@newport.gov.uk >; Beverly Owen beverly.owen@newport.gov.uk Libraries & Museums - Mike Lewis mike.lewis@newport.gov.uk DM Planning – Steve Williams StephenJ.Williams@newport.gov.uk Tracey Brooks tracey.brooks@newport.gov.uk Joanne Davidson joanne.davidson@newport.gov.uk Waste – Malcolm Lane Malcolm.lane@newport.gov.uk Green Services – Jo Gossage < joanne.gossage@newport.gov.uk > Tourism - Lynne.richards@newport.gov.uk

P Hitchings B and B owners Caerleon	pendragonbandb@btinternet.com
Caerleon Tourism Forum	Peterhitchings393@btinternet.com jepalmer@vpalmer.freeserve.co.uk davidmprice@tisdcali.co.uk
National Assembly	William.graham@wales.gov.uk Daniel.mason@wales.gov.uk

Appendix 3 – Preliminary Draft Charging Schedule Consultation Form

3. Proposed CIL rates: Commercial Development

3.1 Do you agree with the proposal to apply a single CIL rate across the City Council administrative area for A1-A3 retail uses? (please tick as appropriate)

YES NO

If you have answered no, please provide further explanation and relevant evidence to support your views.

Please continue on a separate sheet if necessary

4. Proposed CIL rates: All other Development

4.1 Do you agree with the proposal to apply a zero CIL rate to all other uses? (please tick as appropriate)

YES NO

If you have answered no, please provide further explanation and relevant evidence to support your views.

Please continue on a separate sheet if necessary

5. Proposed CIL rates: General

5.1 Do you agree that the proposed CIL rates strike an appropriate balance between the desirability of funding necessary infrastructure and the potential effects of the levy on the economic viability of development across Newport?

YES NO

If you have answered no, please provide further explanation and relevant evidence to support your views.

Please continue on a separate sheet if necessary

6. Further Comments

6.1 Do you have any further comments on the PDCS or supporting documents?

Please provide further explanation and where relevant evidence to support your views.

Please continue on a separate sheet if necessary

Do you want your comments to be considered by 'written representations' or do you want to speak at the Public Examination?

Please tick one of the following:

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

I want to speak at the examination.

Signed: _____ Date: _____

The form must be returned by 5pm on Friday 7 August 2015
By post to: Planning Policy, Newport City Council, Newport, South Wales, NP20 4UR
Or email to: plp_consultation@newport.gov.uk

