

CIL

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SUMMARISED:

Sandra Hutchings

From: Robert Head
Sent: 03 December 2011 11:02
To: DPD
Subject: Community Infrastructure Levy- CIL Consultation 5th December 2011

Dear Sirs

I am writing on behalf of Amber Real Estates Investments Limited(a subsidiary of Boparan Ventures). Amber is the owner of the former Devoncrest Poultry Processing unit site located at Blundells Road, Tiverton. The site is included within allocation AL/ TIV/ 09.

The site can be classified as a Brownfield site, with a former use which is totally inappropriate and unacceptable in a built-up area and within the settlement boundary of the major town within the district. The site should not be brought back into use for the previous use again.

However to re-develop a site of this nature presents many challenges and issues which are abnormal in nature when compared with a Greenfield site. For example the Demolition(and Asbestos removal) of a large number of buildings on the site. The site is also predominantly covered in concrete foundations and hard standing, which will be broken up, crushed and either re-used or removed off-site.

There is also the point of extensive ground investigations to determine the extent and scale of contamination. This will result in remediation strategies(required under current legislation) to remove contamination and substances harmful to human health prior to any residential occupation on the site in question. In addition air quality issues will be investigated and resolved to the satisfaction of the Councils Environmental Health Officer.

All of the above abnormal issues related to the re-development of the Brownfield site are over and above standard build costs. Therefore land values and Developer profit margins are compressed and much lower than that of Greenfield development. The additional cost burden of CIL charges could result in the potential re-development for a change of use to be unviable.

This could result in the former use of the site being brought back into operation.

Therefore we would request that CIL Charges are adjusted or removed to enable a Brownfield site re-development to proceed in conjunction with a Commercial viability assessment to be submitted by the applicant (owner) for validation by the Council.

We note the Councils proposed policy in respect of applying CIL Charges against non-residential uses and support the proposed policy of applying CIL charges on major food retail(supermarkets) only.

It is our opinion that any key gateway/ strategically important/ landmark sites(s) underpinning the councils strategic development plan must be considered in isolation and on its own merit in respect of the application of CIL Charges linked with any forthcoming planning permission. It is our view that Viability must be considered as a test at the appropriate stage during the planning application process.

I do hope our comments will be considered by the Council as part of the on-going consultation process in respect of the proposed Community Infrastructure Levy.

I look forward to hearing from you.

Regards

Rob
Rob Head
On behalf of Amber Real Estates Investments Limited.

05/12/2011