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From: Rachel Morrison
Sent: 27 April 2015 10:55
To: CIL Consultation
Subject: CIL: Draft Charging Schedule Consultation - East Cullompton Strategic Site
Attachments: BRS.5955 MDDC FT 24.04.2015.pdf

Please find attached a letter regarding the above.

Regards

Rachel Morrison

Secretary

Pegasus Group

Planning | Environmental | Retail | Urban Design | Energy | Landscape Design | Graphic Design | Consultation | Sustainability



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FT/BRS.5955

24 April 2015

CIL Consultation
Forward Planning
Mid Devon District Council
Phoenix House
Tiverton
EX16 6PP

Dear Sir/Madam,

Community Infrastructure Levy: Draft Charging Schedule Consultation
Lightwood Land
East Cullompton Strategic Site

Pegasus Group has been instructed by Lightwood Land in their capacity as developers of the strategic site at East Cullompton, to submit representation to the Draft Charging Schedule (DCS).

We support the Council's decision to reconsider the appropriate charge under the Community Infrastructure Levy (CIL) in light of the Local Plan Review, and the emerging development strategy. In particular, the identification of a number of large strategic sites in the emerging Local Plan highlights the importance of re-visiting the DCS from that examined in February 2013.

In line with the PPG's position that "*focus should be in particular on strategic sites on which the relevant Plan relies*" (paragraph 019, Section 25), we support the Council's identification of the strategic sites, including East Cullompton, within separate viability analysis.

The evidence clearly supports the Council's position that the CIL rate for strategic sites should be set at a nil-rate.

The infrastructure costs associated with strategic sites is significant, and the scale of onsite delivery renders the use of a Section 106 Legal Agreement more appropriate to secure the associated infrastructure.

The assumptions used within the Viability Assessment (2014) in respect to site delivery; eg number, density and developable area are supported, and whilst there are some small variations, given the proposals for the strategic site are constantly evolving, these will not materially impact upon the viability appraisals contained upon p78 of the Assessment.

East Cullompton covers a 160ha site, which as detailed in the submitted Viability Assessment (2014) could deliver circa 3,000 homes over its development. Alongside housing, the site will deliver circa 32,000m² commercial development. The

infrastructure associated with this development will be substantial, those already identified include:

- At least 40ha green infrastructure;
- New 2-form primary school;
- M5 Motorway access improvements;
- Town Centre Relief Road;
- Public open space;
- Leisure and recreation facilities;
- Local centre;
- Community facilities;
- Contributions to secondary education, library facilities and other offsite community facilities;
- Improvements to wider strategic road network; and
- Ecological mitigation.

The assumption within the Viability Assessment (2014) that Section 106 cost per unit will be £10,000 is supported, and reflective of the current understanding of likely costs associated with development of this site.

Furthermore, it is noted that the Viability Assessment (2014) considers at paragraph 3.3.23 that there are inherent viability concerns in respect to the site. Whilst it is accepted that viability will be a challenge on the site, it is not recognised that viability issues would prevent the site's development. Consideration of appropriate phasing and infrastructure delivery will overcome short-term viability issues to ensure that the site is deliverable over the longer term. This adds impetus to the position that the site's delivery should be managed through a Section 106 Agreement rather than through CIL, as it allows for the flexibility required when delivering development at this scale.

In summary, we feel that the evidence contained within the Viability Assessment (2014) supports the Council's DCS. However, we remain committed to supporting the Council in the delivery of East Cullompton, and should additional site specific viability evidence be requested to support the Council's CIL Examination, then we would be happy to discuss this.

We would like to be kept informed of the progress of the DCS, and request that we are identified as potential participants in the future Examination.

Yours faithfully,

Dan Weaver
Director