

**Table 1 Summary of representations received on the Draft Charging Schedule Consultation (Regulation 17)**

Ref	Respondent	Summary of Representation	SBC Response
1.	LB Richmond upon Thames	No comments	
2.	Runnymede BC	Suggest clarification of residential uses to which the charge applies.	Agreed. Add footnote to draft Charging Schedule and publish as minor modification.
3.	Natural England	No comment	
4.	Sport England	Raise concerns that the Infrastructure Delivery Plan (February 2014) does not fully reflect the need and demand for sport and recreation provision in the Borough. Sport England identify potential shortcomings in the Council's adopted Playing Pitch Strategy (July 2013) and the Leisure and Culture Strategy which have informed the IDP. It is recommended that the Council make it a priority to undertake a needs and opportunity assessment along with amending its playing Pitch Strategy to make it robust.	The IDP was drafted at a time when the Playing Pitch Strategy and the Leisure Pitch Strategy were being prepared. Whilst the Playing Pitch Strategy has identified future requirements it is accepted that some further work may be required to confirm locations and precise timescales. The identification of any additional sport and recreation facilities to support future growth will inevitably increase the overall size of the funding gap.
5.	Highways Agency	No comment	
6.	Morrisons	The proposed charges for retail will put undue additional risk and financial burden on proposals for new large scale retail development. The evidence base is unsatisfactory in some areas and missing in some assumptions. Some further work and revisions are required to explore the robustness of the CIL rate for convenience retail.	The Council considers that the key differentiation in respect of retail lies in the development use type, with a floor area descriptor simply adding clarity as a secondary measure. Consideration has been given to comparison based town centre retail and other potential forms of new retail development such as larger and small convenience stores and retail

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			<p>warehousing. In terms of the convenience sector, the Sunday Trading provision provides a clear point of reference for differentiation as set out in the viability work. The approach taken with regard to size of units is considered to be suitable and robust in terms of providing appropriate evidence and consistent with established practice.</p> <p>Whilst it is recognised that alternative assumptions may be suggested, particularly at a site specific level, in terms of particular characteristics, it is considered that the range of assumptions selected and in particular, the overall level of cost assumptions, are suitably representative. This is particularly the case when considered as part of the collective assumptions, including key areas such as rental yield.</p> <p>The Council remains satisfied that the supporting evidence and the proposed charging rate is appropriate.</p>
7.	Surrey Police	The IDP has not taken account of the infrastructure requirements of the Surrey Police and as a consequence the funding gap is inaccurate.	It is agreed that some policing requirements could involve infrastructure which would be suitable for CIL funding and that such requirements would tend to increase the size of the funding gap over and above that currently identified. However, at present there are no specific infrastructure projects identified or proposed for inclusion in the IDP which would enable or support the growth and development of the area.

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			The Council will still have the option to review and update the IDP and Reg 123 list to take account of any changed circumstances or the identification of specific infrastructure projects as may be identified through the Policing Plan for the Borough once it has been published.
8.	British Airways plc	Support the proposed Draft Charging Schedule and the nil rate for B1 and B8 uses. BA would encourage the priority for Highways and Transport schemes which improve connectivity to Heathrow airport and consider these should be regarded as “essential” rather than “desirable”.	Noted
9.	The Jockey Club	The Jockey Club and its development partner are at an early stage of bringing forward proposals for the residential development of part of Kempton Park. This major scheme would require considerable investment in supporting highway infrastructure, particularly at Sunbury Cross Roundabout. Consider that Kempton Park should be included in a separate charging zone in any future review of the Charging Schedule so that the levy rate could reflect the likely considerable potential Section 106 obligations.	<p>The representation appears to be directed to a future review of the charging schedule rather than the current draft charging schedule.</p> <p>The Council is aware that the proposals for part of the Kempton Park site are at an early stage of formulation. Nevertheless, this site is situated wholly within the Green Belt and as such any large scale residential scheme would be contrary to the current adopted development plan.</p> <p>It is recognised that a differential approach for strategic scale development is not unusual and has been applied elsewhere. However, given the current Green Belt status of this site and the speculative nature of the proposals for residential development it would be inappropriate at this stage, in the context of</p>

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			CIL, to consider any special designation of this, or any other future large scale speculative development, in determining current charging rates or zones.
10.	Environment Agency	Support the references in the Reg 123 list to “strategic flood defence measures”	Support noted and that the Lower Thames Flood Relief Scheme is now called the River Thames Scheme (Datchet to Teddington)
11.	Mercer Real Estate Partners (Seniats Ltd)	Support the proposed three charging zones and the proposed rates for sites of fewer than 15 dwellings where no affordable housing is required.  Question some of the assumptions used in the viability appraisal for residential and commercial development.	Noted  It is considered that the various assumptions used in the viability appraisals appropriately reflect relevance to the plan and the type and size of development commonly coming forward within the Borough. Although it would be possible to run a multitude of wider scenarios reflecting potential variant site by site negotiations and outcomes it is considered that the scope of viability work has been appropriate to the level of detail required to establish suitable and robust evidence.
12.	Surrey County Council	No comments, but note the collaboration which has taken place with the county council in the preparation of the IDP particularly for highways and education.	Noted
13.	Universities Superannuation Scheme	Have assets in the form of three commercial sites, two of which are in Charging Zone 2 and one in Zone 1. Welcome the zero charge for commercial and the split charging rate for residential development which acknowledges the impact of providing affordable	The proposed residential charging rates reflect the viability evidence and no detailed evidence to the contrary has been provided. Whilst the lower value areas in the north of the Borough are considered currently to provide no scope for a CIL charge where

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		housing. Consider that proposed rates would still have a negative impact on smaller schemes and that a zero rate should be set for schemes to which Policy HO3 Affordable Housing applies across the whole district.	affordable housing is required this is not the case in the higher value areas in the south of the Borough. The council consider these differences are properly reflected in the proposed charging approach. It is not agreed that a zero rate across the Borough would be appropriate on sites of 15 or more dwellings.
14.	East Street Homes	Consider that the proposed higher residential charging rate in Zone 3 is being used as a tax against market housing schemes. Agree with the proposed £60 charge for larger schemes (15 or more dwellings to which Policy HO3 applies) but considers that this should also be the charge for smaller schemes where Policy HO3 does not apply within Zone 3.	The Council's charging proposals reflect the viability evidence which has followed good practice and published guidance. The evidence shows a distinct viability differentiation between sites below the affordable housing threshold compared with those above it. The policy requirement to provide affordable housing has a significant viability impact, which does not affect smaller schemes of fewer than 15 dwellings. The proposed residential charging rates reflect the viability evidence and no detailed evidence to the contrary has been provided.

## CIL Draft Charging Schedule Consultation – 12 March - 10 April 2014

**Table 2 List of Respondents**

Response No	Respondent	Organisation	Representing	Response Type	Date of response	Request to be heard at Examination
1.	Andrea Kitzberger	LB Richmond upon Thames	LB Richmond upon Thames	No comments	24/03/14	No
2.	Cheryl Brunton	Runnymede BC	Runnymede BC	Clarification	27/03/14	No
3.	John Lister	Natural England	Natural England	No comments	31/03/14	No
4.	Heidi Clarke	Sport England	Sport England	IDP comments	07/04/14	No
5.	Paul Martin	Highways Agency	Highways Agency	No comments	08/04/14	No
6.	Kie Farrell	Peacock and Smith	Morrisons	Retail objection	08/04/14	Yes
7.	Samantha Prior	Surrey and Sussex Police	Surrey Police	IDP objection	08/04/14	No
8.	Dennis Pope	NLP Planning	British Airways plc	Support DCS	08/04/14	No
9.	David Keene	David Lock Associates	The Jockey Club	Charging zone objection	10/04/14	Yes
10.	Brian Conlon	Environment Agency	Environment Agency	Support IDP and Reg123 list	10/04/14	No
11.	Andy Leahy	Bespoke Property Consultants	Mercer Real Estate Partners (Seniats Ltd)	Viability Assessment – evidence base comments	10/04/14	No
12.	Kath Harrison	Surrey County Council	Surrey County Council	No comments	10/04/14	No
13.	Mike Bottomley	Deloitte	Universities Superannuation Scheme	Residential Rates too high	10/04/14	No
14.	Kieron Gregson	Carter Jonas	East Street Homes	Residential rates in Zone 3 too high	10/04/14	No