

CIL Draft Charging Schedule: Summary of Submissions on Modified Draft Charging Schedule Nov-Dec 2013

No & Submitter	Topic	Representation	LBL Response
01-MDCS Highways Agency	Have reviewed the consultation and do not have any comment at this time (<i>no previous submission</i>)		Submission noted. No action or response required. Raises no issues for examination.
02-MDCS Marine Management Organisation	No comments to submit in relation to this consultation (<i>no previous submission</i>)		Submission noted. No action or response required. Raises no issues for examination.
03-MDCS Turley Associates on behalf of Sainsbury (previous submission no. 014)	Retail CIL	Concern at proposed CIL charge for larger retail units. The change in definition in the charging schedule from ' <i>Retail (in excess of 2,500 square metres)</i> ' to ' <i>Large Retail Development (*)</i> ' with the proposed CIL charge remaining unchanged does not address their concerns that larger retail units should not be subject to CIL.	The original Lambeth viability study undertaken by the Councils Technical Advisors, BNP Paribas Real Estate, identified differences between smaller and larger retail units in levels of profitability and thus capacity to pay CIL. The charge on retail warehouses and superstores/ supermarkets (as defined in the modified draft charging schedule) is therefore intended to remain unchanged. LBL CIL Topic Paper 3 – Retail rates further amplifies the Councils position on this matter.
04-MDCS Natural England	Nothing further to add to response of 9th November 2012.	View CIL as playing an important role in meeting NPPF requirement to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Concerned that infrastructure provision be undertaken in strategic manner and that	Points noted. No action or response required. Raises no additional issues for examination.

		infrastructure to meet statutory obligations covering environmental considerations is provided.	
05-MDCS Quod on behalf of Braeburn (Shell Centre) (previous submission no. 024)	Points made in the previous submission dated 12 Aug 2013 stand.	General repeat of concerns on site specific issues and viability issues, as it applies to Shell centre Scheme.	Further analysis of the viability of the proposed redevelopment of the Shell Centre has not justified any departure from the proposed CIL rate. The Council's principles for setting the CIL rate intended to apply to the site are set out in, and amplified in LBL CIL Topic Paper 1 Waterloo and Vauxhall Residential Rates – Valuation Considerations.
06-MDCS Turley Associates on behalf of Travelodge (previous submission no. 008)	Hotel development costs and CIL evidence base	This submission reiterates the points made in the original submission, but provides some additional data in support of these.	Using these inputs in the modelling does not change overall viability, and thus the proposed CIL rates do not change. It is noted that in using the Travelodge Vauxhall development as a model for testing development viability, the proposed CIL rate is set at only 28% of the rate the CIL viability study demonstrated as what would be the maximum rate considered viable. Running the modelling using the figures supplied by Turleys makes almost no difference to the viable level of CIL, which, with these figures, remains well above the proposed CIL. The proposed hotel CIL will therefore not change. The Council's principles in respect of the proposed hotel CIL are set out and amplified in LBL CIL Topic Paper 2: Hotel

			Rate Considerations/.
07-MDCS Deloitte on behalf of Kings College London (previous submission no. 011)	Affordable student housing	Propose that as in previous representation that Affordable Student Housing should be exempt from CIL in all eventualities.	The Council consider that either Charitable relief, Discretionary Relief for exceptional circumstances could be applied for student accommodation schemes which provide subsidised rent. Rather than through a separate affordable student rate in the charging schedule. LBL CIL Topic Paper 5: Student Accommodation Considerations discusses the relevant issues.
	Proposed CIL rate for market student housing too high to be viable.	Claim that proposed CIL rate is based on inappropriate input amounts/percentages: <ul style="list-style-type: none"> - Purchaser's costs not included in modelling - Disposal costs now deleted - Interest rates increased from previous modelling - Build costs reduced from original study – not justified in Lambeth, and inconsistent with figures BNPP has used in other London boroughs. <p>These all improve apparent viability and thus wrongly increase the claimed viable level of CIL.</p>	The Council's CIL technical advisors BNP Paribas Real Estate, have assessed the appropriateness of using these assumptions in modelling CIL viability for student housing, and found that some of them are not justified. Running the model again using the appropriate suggested inputs does not change the viable level of CIL on student housing. LBL CIL Topic Paper 5: Student Accommodation Considerations discusses the relevant cost assumptions.