

**TO: EXECUTIVE
24 JUNE 2014**

**COMMUNITY INFRASTRUCTURE LEVY – AMENDED DRAFT CHARGING SCHEDULE
AND DRAFT PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT
Director of Environment, Culture and Communities**

1 PURPOSE OF REPORT

1.1 The purpose of this report is to:

- inform the Executive of the results of the consultation on the Community Infrastructure Levy (CIL) Draft Charging Schedule;
- summarise the findings of further viability work;
- summarise the legal advice received;
- seek approval for the publication and submission of an amended Draft Charging Schedule and,
- seek approval to consult on a draft Planning Obligations Supplementary Planning Document.

1.2 The report also seeks approval for a draft list of infrastructure projects for which CIL will be collected (the 'Regulation 123' List). The latest version reflects the changes made to the Draft Charging Schedule and legal advice.

2 RECOMMENDATIONS

2.1 That the Executive:

- (i) **approves the amended Draft Charging Schedule at Appendix A for publication and consultation;**
- (ii) **approves the amended Draft 'Regulation 123' List of Infrastructure Projects for which CIL will be charged at Appendix B, and the Draft Instalment Policy at Appendix C, for the purpose of consultation;**
- (iii) **authorises the Director of Environment, Culture and Communities, in consultation with the Executive Member for Planning and Transport, to:-**
 - (a) **approve the Draft Charging Schedule for submission to the Secretary of State;**
 - (b) **agree minor modifications to the Draft Charging Schedule as appropriate following public consultation; and,**
 - (c) **approve the statements referred to in regulations 16 and 19 of the Community Infrastructure Regulations 2010; and,**
- (iv) **approves the Draft Planning Obligations Supplementary Planning Document at Appendix J for the purpose of consultation.**

3 REASONS FOR RECOMMENDATIONS

3.1 The Community Infrastructure Levy (CIL) will become an important mechanism by which the Council will secure money to create new and improve existing infrastructure to support growth in the Development Plan. The publication and submission and examination of a Draft Charging Schedule and carrying out consultation on it are legal requirements for the introduction of CIL.

4 ALTERNATIVE OPTIONS CONSIDERED

4.1 The proposed approach is to amend the draft schedule, consult on the changes, submit the amended draft for examination and then move as quickly as possible to adopt the schedule and commence charging. There are two alternative options to the recommended approach as follows:

- Submit the schedule as it stands and proceed to examination and introduction of CIL as early as possible; or,
- Abandon CIL

4.2 The advantages and disadvantages of these options are set out in the following table:

Option	Pros	Cons	Conclusion
Option 1 Submit the previous version of the schedule and proceed to examination and introduction of CIL	Quickest way to get CIL in place. Some rates are higher than in amended schedule	Proposed rates are not supported by most up to date evidence. Some rates are lower than in amended schedule Risk that examiner will significantly lower rates	On balance this option is not supported as it would undermine the Council's credibility at examination.
Option 2 Abandon CIL	Avoids abortive work if CIL is abandoned by government following 2015 elections.	Risk of significant loss of infrastructure funding after April 2015 if CIL is not abandoned	While CIL may be abandoned by government in future, the consequences if it is not abandoned are too serious for this approach to be supported at present.

Option	Pros	Cons	Conclusion
<p>Option 3</p> <p>Amend the draft schedule, consult on, and then submit, the amended draft for examination and then move as quickly as possible to adopt the schedule and commence charging (proposed option)</p>	<p>Would have properly justified draft schedule at examination, more likely to be supported by the examiner.</p>	<p>Would need Executive approval and further consultation on changed rates and zones before submission.</p>	<p>Robust approach for examination with most rapid introduction of charging following examination.</p> <p>Preferred option.</p>

5 SUPPORTING INFORMATION

Background to CIL

- 5.1 CIL was introduced in the Planning Act 2008 and further measures relating to its operation are contained in the Localism Act and in Regulations. It is basically a standardised tariff system for collecting contributions towards infrastructure provision from developers. CIL payments will be calculated by applying tariff rates to the net increase in floor area resulting from a development.
- 5.2 Developing the CIL is an Executive function, and has been informed by input from an Overview and Scrutiny Working Group, an Officer Steering Group and public consultation.

Setting the Level of CIL

- 5.4 In setting its CIL rates the Council must strike an appropriate balance between -
- (a) the desirability of funding from CIL (in whole or in part) 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.
- 5.5 There are therefore two key elements to the setting of CIL:
- Demonstrating the need for new infrastructure and that there is a gap in the funding available for its provision that should be met by CIL; and,
 - Setting CIL rates that strike an appropriate balance between the desirability of funding development from the levy and the potential impact upon the economic viability of development across the Borough.
- 5.6 The following sections cover how these two aspects have been addressed in the preparation of Bracknell Forest's CIL Preliminary Draft Charging Schedule.

Infrastructure Funding

- 5.7 The Council's Site Allocations Local Plan (SALP) identifies the proposed sites to be allocated to meet the need for new homes in the Borough between 2006 and 2026. The SALP was adopted by the Council in July 2013.
- 5.8 One of the supporting documents for the SALP is the Infrastructure Delivery Plan (IDP). This identifies the items of new or improved infrastructure that will need to be provided to support growth and mitigate the impacts of the planned development. For the purposes of CIL the costs of infrastructure outlined in the IDP have been refined and updated to include up to date costs for those items of infrastructure which could be best funded by CIL. The updated CIL information includes other elements which can be paid for from CIL such as some of the costs of operating and maintaining infrastructure.
- 5.9 The summary table below lists the estimated costs for various types of infrastructure needed to support growth that have been identified as requiring CIL to help fill the gap in available funding.

Table 1 – Infrastructure Costs

Infrastructure	Estimated cost
Local Road Network	£16,917,000
Footpaths and Cycleways	£3,890,000
Public Transport	£5,950,000
Primary Education	£36,517,000
Secondary Education	£48,187,000
Special Educational Needs	£3,490,000
Community Facilities	£8,270,000
Built Sports	£4,275,000
Police	£560,000
Open Space	£4,075,000
SPA Avoidance & Mitigation	£2,790,000
Biodiversity	£74,000
Public Rights of Way	£532,000
Total	£135,647,000

- 5.10 The table above does not include the costs of administering CIL for which the Council can use a percentage of CIL receipts. Neither does it include the significant proportion of CIL receipts that the Council must pass on to Town and Parish Councils within whose areas development takes place. The requirement is that 15% of CIL received should be passed to the Town and Parish Councils, rising to 25% if and when they adopt a Neighbourhood Development Plan. More detail on infrastructure requirements is contained in the Infrastructure Delivery Plan approved by Council as part of the Site Allocations documentation in November 2011. The document can be found on this link: <http://consult.bracknell-forest.gov.uk/file/2042423>
- 5.11 CIL is intended to reduce the gap between the cost of providing, operating and maintaining the infrastructure needed to support planned development and the amount of money available from other sources. To establish the funding gap an

estimate was made of the likely contribution from other funding sources. The evidence used in this assessment includes:

- Long term strategic delivery plans, such as the Local Transport Plan;
- Financial forward plans of delivery agencies; and,
- Specific evidence provided by delivery agencies on spending plans.

5.12 The estimated cost of funding infrastructure to support planned growth in the Borough is approximately £135.65 million. The anticipated funding from other already identified sources (this will include capital spending already in the budget and S106 agreements) is £55.15 million, which leaves a funding gap of some £80.5 million. The estimated CIL income based on the planned developments in the Borough to 2026 is around £72.72 million (this is gross income from which deductions will be made for payments to Town and Parish Councils and administration costs. To meet the full anticipated cost of all infrastructure elements a minimum of approximately £7.8 million will also need to be allocated from other sources including central government funding. The period being planned for extends to 2026 and it is not possible to provide certainty on what funding streams will be available over this period. Any significant change in market conditions over this period could also result in a change to the CIL rate and hence the size of the funding gap. Further information on the figures is provided in the Infrastructure Funding Gap document at Appendix G.

Viability

- 5.13 It is important that CIL rates do not prevent development from going ahead and should therefore be based on up to date information on local development economics. In order to provide this information the Council commissioned consultants to assess the viability of development in the Borough and provide up to date evidence of development costs and values. This assessment is contained in the Community Infrastructure Levy – Viability Study prepared by BNP Paribas at Appendix D. This work has been updated to reflect changes in development values and costs. The updated viability analysis is at Appendix I
- 5.14 It is not necessary to demonstrate that all development in the Borough will be viable with CIL but rather that the Council has struck the appropriate balance between securing funding and the impact of CIL on the economic viability of development such that the strategy for planned development will not be significantly affected. It is also clear from CIL examinations already held that it is acceptable for the imposition of CIL to have an effect on land values. The study methodology compared the residual land values of a range of generic developments to a range of benchmark land values. Where a development incorporating a given level of CIL generated a higher value than the benchmark land value, then it was judged that the proposed level of CIL will be viable.
- 5.15 The study uses the residual land value method of calculating the value of each type of development. This involves calculating the value of the completed scheme and deducting development costs (construction, fees, finance and CIL) and developer's profit. The residual amount is the sum left after these costs have been deducted from the value of the development. This method is widely used by developers in determining their offer price for a site.
- 5.16 The housing and commercial property markets are inherently cyclical and the Council is testing its proposed rates of CIL at a time when values have fallen below their peak. This has been allowed for by running a sensitivity analysis which inflates sales

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values by 10% and build costs by 5%. This analysis is indicative and only provides an indication of the levels of CIL that are viable in today's terms and the impact of market changes on viability. The study also tested a fall in sales values of 5%, to show the impact of any adverse movements in sales values in the short term.

- 5.17 The results of the study reflect current market conditions which may improve over the medium term. It is therefore important that the viability situation is kept under review so that levels of CIL can be adjusted to reflect any future changes. CIL charge setting is not a one-off exercise and will be reviewed and revised at intervals and in response to changes in development viability. The Overview and Scrutiny Working Group has recommended a review of CIL rates after 12 to 18 months of operation. This is considered appropriate in order to assess its impact on the level of planning and development activity in the Borough and whether any of the rates or zones should be adjusted.
- 5.18 The proposed schedule uses the findings of the Viability Study and the updated viability assessment to recommend setting different levels of charge for different land uses (residential, business, retail etc.) and for different geographic areas. These rates, and the proposed variations within them, have been set at a level at which the available evidence shows most development is viable. The proposed variations between rates for different uses and geographic areas are based on evidence of quantifiable differences in their viability.
- 5.19 In response to comments made on the Preliminary Draft Charging Schedule, the Council commissioned further viability work focussed specifically on the six strategic urban extension sites proposed for allocation in the SADPD. The promoters of these sites were invited to provide financial information to assist this work and some information was received as a result. A report of the findings of the site-specific assessment work is at Appendix E.
- 5.20 The latest viability assessment reflects recent uplifts in development values, though the effect of these on overall viability has been reduced by an accompanying increase in construction costs. A change introduced in the 2014 CIL Regulations has enabled the Council to introduce different rates for residential development for different numbers of dwellings. The viability evidence indicates a marked change in viability in most areas above and below the affordable housing threshold and this supports different rates in these areas above and below the threshold.
- 5.21 The changes made to produce the amended draft charging schedule can be summarised as follows:
- Changes to the rates for strategic sites based on updated infrastructure cost and development value information and changes to the Council's instalments policy;
 - Separate rates in Outer Bracknell, Northern Parishes, Sandhurst and Crowthorne for residential developments falling below the affordable housing threshold (this has increased the maximum rate of CIL from £220 per square metre to £350);
 - Changes to the rates for residential care homes in light of updated viability information;
 - Change to the definition of the type of retail development for which CIL will be levied in light of updated viability advice; and,
 - The deletion of the CIL charge for hotels in light of recent information on the viability of hotel schemes.

Overview and Scrutiny

- 5.22 A Working Group of the Overview and Scrutiny Commission was established following a request by the Executive on 10 January 2012, to undertake a review of the Council's CIL arrangements. The work of the Group took place between February 2012 and January 2013, with a review report published in January 2013. The report summarises the background to the CIL and sets out how the Group established the review, the information and evidence gathered, the conclusions reached and ten recommendations.
- 5.23 The Working Group (WG) undertook the following as part of the Review:
- In February 2012 the WG received a comprehensive introductory briefing from Council officers, including a briefing from the Borough Solicitor on the legal considerations applying to CIL. The WG also met the Borough Treasurer to explore the financial consequences of CIL;
 - In March 2012 the WG met with a Senior Director of BNP Paribas Real Estate (the consultants who undertook a Viability Study of CIL) to learn about the wider picture on CIL developments nationally, and to consider the CIL viability assessment for the Borough;
 - In May 2012 the WG considered a revised Viability Study and also met with the Planning Director of the Home Builders Federation (HBF). This provided an understanding of the of the HBF's perspective on how CIL is viewed by developers, in terms of what would be a viable tariff and suitable CIL arrangements;
 - Other Council's CIL Charging Schedules. The WG reviewed the CIL charging schedules from other authorities and decided to meet members and officers of another Council which was more advanced in its CIL preparations to learn from their experiences;
 - In June 2012, two members of the WG visited Portsmouth City Council where they received a briefing of the experiences and lessons to be learnt;
 - In October 2012, two members of the WG attended a CIL conference at Huntingdon (which was among the first Councils to implement CIL), who drew attention to various learning points;
 - By October 2012 the WG reviewed the responses to the Preliminary Draft Charging Schedule consultation. Officers highlighted that responses showed there was still confusion about CIL and s.106, disagreement about how much money is available from other sources and lack of justification on the requirements/estimated costs. The WG reviewed all the responses to the consultation and draft views of officers on the responses; and,
 - In November 2012, the WG met with the Borough Treasurer to discuss the prioritisation and decision making process for the capital programme and how the CIL-funded projects might be handled.
- 5.24 The recommendations covered a wide range of CIL issues including the approach to setting CIL rates, formulating the list of infrastructure for which CIL will be charged, issues around the administration and spend of CIL and working with Town and Parish Councils on priorities. The Group's conclusions and recommendations were considered by the Executive at its meeting on 12 March 2013 and most of the ten recommendations were adopted in full or in part. It was also noted by the Executive that the Group's work has been very valuable in guiding the introduction of CIL in Bracknell Forest.

The First Draft Charging Schedule

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- 5.25 Following approval by the Executive on 21 May 2013, consultation on the first Draft Charging Schedule (fDCS) took place from 10 June to 23 July 2013. Many detailed comments were received from 21 different respondents. A table summarising all the individual comments, grouped by topic and providing an officer response to each of them is at Appendix F.
- 5.26 Points raised in responses to the consultation included:
- There should be a greater margin of viability between the maximum possible rate and the rate charged;
 - There should be greater clarity on the balance between CIL and continued use of S106 agreements;
 - The Council should offer exceptional relief from CIL payment;
 - Reference should be made to park homes being exempt from CIL;
 - Reference should be made to the proportion of CIL receipts that will be passed to Parish and Town Councils;
 - Rates are generally too high (specific comments on this related to several of the strategic sites);
 - Concerns about the provision of mitigation for impacts on the Special Protection Area (SPA) under the CIL regime;
 - The proposed instalments policy is unduly onerous; and,
 - Challenges to various of the assumptions made in the viability assessment work.
- 5.27 A table summarising all the individual comments, grouped by topic and providing an officer response to each of them is at Appendix F. The following actions were undertaken to address some of the key points raised and inform preparation of the revised Draft Charging Schedule:
- Further viability work was carried out on the general rates proposed and more detailed work on the strategic allocation sites;
 - A revised charging schedule was produced based on a viability buffer of at least 25% between maximum and proposed rates;
 - Legal advice was secured to inform the Regulation 123 list and the securing of SPA mitigation (summarised below);
 - A draft Planning Obligations Supplementary Planning Document has been produced to help clarify the relationship between CIL and S106 funding; and,
 - The instalment policy was reviewed with more generous payment periods introduced.

Draft Regulation 123 List

- 5.28 The 'Regulation 123 List' is a list of the infrastructure projects for which it is intended to charge CIL. It is important because contributions cannot be sought for any item on the list from Section 106 agreements. Consideration has been given to the scale of infrastructure proposed and whether it is appropriate to use CIL funding or seek contributions via S106 agreements. The general principle is that where a project is likely to require contributions from a large number of developments (such as a new secondary school or major highway improvement) it should be funded by CIL. In

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other cases there may be benefits in terms of certainty, cost and timing of delivery in continuing to fund smaller projects via S106.

- 5.29 The Council has sought legal advice on the provisions of Regulation 123 which has influenced the content of the Draft Regulation 123 List.
- 5.30 Recent government guidance published in December 2012 says that charging authorities should provide at the examination a draft Regulation 123 List and set out the known site-specific matters where S106 contributions may continue to be sought. For this purpose a draft Regulation 123 List has been prepared, based on the identified infrastructure requirements arising from planned development in the Borough. A draft Regulation 123 List is attached at Appendix B and will form part of the proposed consultation.

Instalments Policy

- 5.31 The CIL Regulations include provisions for the charging authority to operate an instalments policy to allow staged payments of CIL. This is a means of ensuring that developers are not faced with unreasonably high up-front CIL charges at the commencement of a major development. In line with other charging authorities' policies it is proposed to allow payment by instalments above a threshold amount of CIL with longer periods being allowed the larger the amount of CIL payable. Following the consultation on the draft charging schedule, the proposed instalments policy has been reviewed along with the impact it has on development viability. The updated draft policy is attached at Appendix C to this report.

Exceptional Relief

- 5.32 The Council has the discretion to decide on whether or not to make Relief for Exceptional Circumstances (REC) available for developers. The aim of REC is to help bring schemes forward which would not otherwise have been viable because of the combined costs of the CIL levy and Section 106 requirements.
- 5.33 Charging authorities may offer relief from the levy in exceptional circumstances where a specific scheme cannot afford to pay the levy. If the Council wishes to offer exceptional circumstances relief in its area it must first publish a notice of its intention to do so. A charging authority can then consider claims for relief on chargeable developments from landowners on a case by case basis, provided the conditions set out in Regulation 55 (as amended) are met:
- a section 106 agreement must exist on the planning permission permitting the chargeable development; and,
 - the charging authority must consider that paying the full levy would have an unacceptable impact on the development's economic viability; and,
 - the relief must not constitute a notifiable state aid.
- 5.34 The viability evidence indicates that the proposed rates will not cause the vast majority of sites in the Borough to become unviable for development. It is therefore not proposed to make exceptional relief widely available. The Council will have a presumption against its use, but will retain the ability to introduce it (and then to remove it) when its use is required for a particular site in line with the conditions listed at paragraph 5.32 above.

Section 106 Income

- 5.35 The CIL guidance published in December 2012 suggests that, as background evidence, the charging authority should provide information about the amounts raised in recent years through section 106 agreements and the extent to which affordable housing targets have been met. The table below shows the amounts of money collected in the last 7 years via section 106 obligations.

Table 2 – Annual Income from Section 106

Year	Amount
2007/08	£2,395,290
2008/09	£2,872,580
2009/10	£2,226,570
2010/11	£2,163,500
2011/12	£2,015,000
2012/13	£645,000
2013/14	£2,530,000

- 5.36 The following table shows the level of affordable housing completed in the Borough since 2000. It does not show affordable housing created through means other than new build.

Table 3 – Affordable Housing Completions

Year (1 April – 31 March)	Gross affordable housing completions	Net affordable housing completions
2000/01	58	58
2001/02	133	133
2002/03	49	49
2003/04	86	71
2004/05	62	62
2005/06	57	57
2006/07	29	29
2007/08	193	192
2008/09	197	197
2009/10	153	152
2010/11	113	113
2011/12	49	49
2012/13	66	66
2013/14	115	115

Source: JSPU Planning Commitments for Housing at March 2009: BFBC, data from planning applications

6. Planning Obligations Supplementary Planning Document

- 6.1 In order to provide clarity on the relationship between CIL and the continued use of S106, the Council has prepared a draft Planning Obligations Supplementary Planning Document (POSPD). This will replace the existing Limiting the Impact of Development SPD (LID SPD) and provide updated cost and other information.
- 6.2 The SPD will supplement Policy CS6 in the adopted Core Strategy which requires development to contribute to the delivery of infrastructure and mitigate any adverse impacts it causes. The POSPD explains what infrastructure will be needed to support and mitigate planned development and the legislative and policy framework.
- 6.3 The draft document explains the various means of securing infrastructure provision including planning conditions, planning obligations, section 278 agreements, CIL and other sources of funding. It also explains how development viability will be taken into account in cases where normal infrastructure funding provision makes development unviable.
- 6.4 It sets out the basis on which the Council will seek contributions towards a range of individual infrastructure types including:
- Transport
 - Waste Management
 - Education
 - Affordable Housing
 - Community Facilities
 - Public Realm
 - Retail Facilities
 - Public Art
 - Police Service
 - Primary Health Care
 - Open Space of Public Value
 - Thames Basin Heaths Special Protection Area Avoidance and Mitigation
 - Rights of Way
- 6.5 It is proposed to consult on the draft SPD at the same time as the Draft Charging Schedule so that consultees have comprehensive information on the Council's intentions for CIL and Section 106 funding. Following consultation and the outcome of the examination of CIL it is intended that the final version of the POSPD would be adopted prior to the introduction of CIL and in accordance with the relevant regulations.

7. Future Programme

- 7.1 The intention is to have a CIL Charging Schedule approved by January 2015 to enable charging to commence in April 2015. The complexity of the process is such that this is an achievable but challenging timescale. The future stages are set out below:

Key Milestone	Date
Publication of Updated Draft Charging Schedule	Jul 2014
Consultation on Draft Charging Schedule	Jul-Aug 2014
Submission	Sep 2014
Examination (anticipated)	Nov 2014
Council Approve Final Charging Schedule	Jan 2015
Commence CIL Charging	Spring 2015

- 7.2 Work has been undertaken on establishing the regimes for administration, collection and spending of CIL. Software for the calculation of CIL liabilities, the receipt and issue of notices and monitoring of CIL is available as an add-on to the Council's existing planning application system (Uniform). Further work will be required to calibrate the system once the final charging schedule and zones are adopted. The Council will also have a duty to monitor and report annually on the collection and spending of CIL.
- 7.3 Specific procedural changes to implement CIL will be recommended to the Executive at the time of approving the final Charging Schedule in January 2015.

8. ADVICE RECEIVED FROM STATUTORY AND OTHER OFFICERS

Borough Solicitor

- 8.1 The Borough Solicitor's comments are contained in the confidential Annexe to this report.

Borough Treasurer

- 8.2 It is anticipated that CIL will generate a significant amount of income in future years. Having deducted the cost of administering CIL and the amount that must be passed onto Town and Parish Councils, the balance will be used to fund infrastructure to support planned growth in the Borough. However, as set out in the report CIL will not meet all of the Borough's infrastructure requirements. Managing this shortfall will be a key consideration for future capital and revenue budgets.

Equalities Impact Assessment

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- 8.3 A full impact assessment for the introduction of the CIL has been published by CLG (January 2011). This includes an Equalities Impact Assessment, which concludes that the CIL is unlikely to have an adverse impact on any social group. An Equalities Screening Record has been completed for the Draft Planning Obligations Supplementary Planning Document and is attached at Appendix L.

Strategic Risk Management Issues

- 8.4 None as a consequence of this report. However, timely introduction of CIL will reduce the risks associated with lack of adequate funding for necessary infrastructure. There are strategic risks associated with CIL, particularly around the level of CIL receipts and the potential non-delivery of housing if CIL is set too high (with consequential impacts on the New Homes Bonus).

Consultation

- 8.5 The Regulations specify a range of bodies that must be consulted on the Draft Charging Schedule and the Draft POSPD, including local businesses and Town and Parish Councils. It is proposed to publicise the consultations in the local press and contact all developers, planning agents and landowners on the Council's Local Development Framework database.
- 8.6 It is proposed to run the consultations for a period of 6 weeks from 4 July to 15 August 2014. The consultation documents and a questionnaire will be available online and hard copies will be made available at the Borough Council Offices, at public libraries and at Town and Parish Council offices.
- 8.7 The results of the consultation on the draft Charging Schedule will be reported to the examiner undertaking the examination into the Draft Charging Schedule prior to its adoption, and the outcomes of the consultation and the examination will be reported to Executive when the charging schedule is put forward for adoption. The results of the consultation on the draft POSPD will be reported, along with any recommended changes, when it is put before the Executive for adoption.

Background Papers

- APPENDIX A Bracknell Forest Council Draft Charging Schedule
- APPENDIX B Draft Regulation 123 List
- APPENDIX C Proposed Instalments Policy
- APPENDIX D Viability Study May 2012
- APPENDIX E Further Site Specific Viability Study
- APPENDIX F Summary of Comments received on the first Draft Charging Schedule and Officers' Responses
- APPENDIX G Infrastructure Funding Gap
- APPENDIX H There is no Appendix H
- APPENDIX I Updated Viability Assessment May 2014
- APPENDIX J Draft Planning Obligations Supplementary Planning Document
- APPENDIX K Draft Planning Obligations SPD – Sustainability Appraisal / Strategic Environmental Assessment (to follow)

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APPENDIX L Draft Planning Obligations Supplementary Planning Document – Equalities
Impact – Equalities Screening Record (to follow)

CONFIDENTIAL ANNEX – Legal Advice

Contact for further information

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