

Developer Contributions SPD; Overview of consultation responses

Ref	Name	Organisation	Section	Summary of comment received	Council response to comment
1	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 1, para 1.4	It is noted the review of the SPD deals with more than the CIL Regulations	Changes have also been made to improve the clarity and operation of the document, which are based upon two years experience of using the SPD
2	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 4, para 6.7	This paragraph contains the statement that “Other service providers, such as Surrey County Council (responsible for transport and education improvements) will be consulted on individual planning applications likely to carry developer contribution liability.” It should be made clear that UCA will also be one of the other service providers that will be consulted.	The Council will routinely consult those service providers who are responsible for spending those developer contributions included in the tariffs.
3	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 7	This page sets out, for each infrastructure element, the contribution to be made, exemptions etc. a. For the avoidance of doubt, education and student housing should be shown as being exempt from all these elements, in accordance with national guidance. b. Please also see Annex A for further information.	Students will have an impact on some infrastructure provision and purpose built student accommodation therefore should attract infrastructure charges towards these.
4	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 19, para 8.7	“Student housing is not permanent housing and is only provided to individuals who are members of specified educational institutions.” a. This part of the document should make it clear that purpose-built, or purpose-adapted, student housing schemes will not be expected to make a contribution to affordable housing. b. Student housing is permanent. While any one year’s intake of students is, by definition, not permanent, the need for that institution to have student residential accommodation to offer to its students is permanent. In that respect, it is important to note that there are a number of	The Council does not require affordable housing contributions from purpose built student accommodation. Modify para 8.7 in the following way: ‘Student housing does not fall within the adopted Core Strategy definition of ‘affordable housing’. It is not permanent housing and is only provided to individuals who are members of specified educational

				<p>institutions, throughout the country, that have provided, in the same building(s), residential accommodation for its students for 50 years or more.</p> <p>c. It is also strange to seek diminish the importance of student housing by describing it as being limited to “members of specified education institutions.” Here again, the Council seems to be ignoring central government advice as Annex C of PPS 3 requires local authorities to “identify the accommodation requirements of specific groups such as students”.</p> <p>d. In the Report of the Inspector who chaired the Examination in Public into the Core Strategy, he noted that student housing needs are not addressed in the Core Strategy or in the Housing Needs Survey and referred to that as “an important omission”.</p>	<p>institutions- Purpose built student accommodation will not be required to make a contribution towards affordable housing.’</p>
5	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 23, para 1.2	<p>“<u>In principle</u> the tariffs will apply to all schemes involving developments with a net increase of one or more new dwellings or of 100m2 of commercial floor space. They will not apply to:</p> <ul style="list-style-type: none"> • commercial developments involving a net increase of less than 100m2 floor space; • domestic extensions; • community infrastructure projects including health, education and other public service developments that are providing direct benefit to the local area • Affordable social rented housing <p>a. The two words proposed to be added at the beginning (“In principle”) should not be added as they detract from certainty, and would cause confusion.</p> <p>b. UCA is naturally please that the tariffs will not apply to education schemes at all levels.</p>	<p>The phrase ‘in principle’ is used as it may be the case that developments which are identified as being eligible to pay developer contributions may not have to make contributions to all of the tariffs. Contributions will be assessed on a case by case basis.</p>
6	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 24/25, para 2.1	<p>This section sets out the background to the need for education contributions to be made.</p> <p>a. There should be a reference to UCA as a provider of</p>	<p>It is acknowledged that Surrey County Council is not the only education provider. However, the</p>

			to 2.7	<p>Higher and Further Education, as recommended by central government: UCA is part of “Social Infrastructure.”</p> <p>b. An explanatory sentence should be added that new housing developments will mean additional children in the borough, many of whom will attend Higher and Further Education Institutions. The proportion of young people, nationally, who experience university education is over 42%, and is probably (considerably) higher in Epsom & Ewell.</p>	tariffs are based entirely on the provision of compulsory education (up to the age of 18). It does not cover further and higher education.
7	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 25, para 2.8 to 2.9	<p>This section sets out how the tariff has been calculated.</p> <p>a. The figure that should be the basis of the tariff for Higher and Further Education is approximately £23,500 per student (at 2010 cost levels) – that is, in effect, the total capital cost of providing sufficient extra building for one additional student – this is based on the new teaching building currently being constructed.</p> <p>b. In addition, there will be increased demand for student housing, including purpose-built student residential schemes.</p>	This review does not seek to introduce new tariffs. The Council cannot seek contributions towards every type of infrastructure – only that which is linked directly to the development being carried out.
8	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 32, para 6.9	<p>This paragraph effectively states that student accommodation schemes will be expected to contribute to “Parks & Gardens/Amenity Open Space” & “Outdoor Sports facilities.”</p> <p>a. Student accommodation schemes should be exempt as they are an integral part of the “offer” that Higher and Further Education Institutions must provide, and paragraph 1.2 on page 23 has already stated that the tariffs will not apply to community infrastructure projects such as education.</p> <p>b. In any event, Higher and Further Education Institutions ensure the provision of most of these facilities, as does the accommodation occupied by students.</p> <p>c. PPS 3 requires local planning authorities to “identify</p>	Students will have an impact on local infrastructure such as parks & gardens / amenity open space and outdoor sports facilities.

				the accommodation requirements of specific groups such as students”.	
9	John Sharkey & Co	On behalf of the University for the Creative Arts	Page 33, para 6.15	This paragraph sets out the amount of the contribution that student accommodation schemes will be expected to contribute to “Parks & Gardens/Amenity Open Space” & “Outdoor Sports facilities.” Please see comments beside point number 10 above.	As above.
10	Julia Coneybeer	Natural England	General comment	Emphasizes the importance of securing developer contributions for Green Infrastructure (GI), in accordance with Policy CS4; Open Spaces and Green Infrastructure of the Borough’s Core Strategy, primarily through the Community Infrastructure Levy. GI is a network of multi functional greenspace which provides a range of social, economic and environmental benefits. It is therefore crucial that sufficient developer contributions are secured towards maintaining and enhancing the Borough’s GI network, and it would be helpful to know whether a fuller review of the SPD in the future may seek to strengthen this.	Currently the CIL Regulations are in place, although the Coalition Government may identify an alternative process for seeking contributions. Until there is greater certainty as to the future approach, the Council will continue to use the SPD. However, in the interim the Council will seek to further develop the Infrastructure Delivery Plan which will identify schemes towards which developer contributions may be sought. Green Infrastructure is recognised as an important element of the Borough’s infrastructure.
11	Steve Williams	English Heritage	General comment	Note that the £500 tariff per person identified in section 7 for public realm and conservation area enhancement at para 7.9 differs from the figure given in the table on page 7 where environmental improvements give rise to a £549 contribution. The latter is said to reflect the June 2010 RPI adjustment. Should the figure in para 7.9 be adjusted too, or if it already has been, is some explanation required to explain the basis of the £49 difference between the two.	Section 3 sets out how the tariffs have been calculated, which were based on December 2007 prices. The partial review of the SPD provided the opportunity to update the tariffs in line with the Retail Price Index. The updated tariffs set out in the table on page 7 reflect this. For clarity the updated tariff levels will also be included in section 3.