

CABINET
24 JANUARY 2008
GENERAL ASSEMBLY OF THE COUNCIL
28 JANUARY 2008

Appendix C: Responses to consultation (Dartford and Gravesham combined)

QUESTIONS	RESPONSES		
<i>Q1. Do you agree with the broad analysis set out above of the transport issues that needs to be addressed? A) Yes, B) No – if so what would you suggest?</i>	Total:40	29 agree	9 disagree
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
S.106 has not worked as a mechanism (1)			
Risks to Local Authorities – what happens if costs are greater than revenue (1)			
Legal basis of proposals not clear (1)			
Planning Gain Supplement about to be introduced (1)			
Do not apply to brownfield sites (1)			
If Government does not fund infrastructure the housing numbers should be reduced (1)			
Seek additional Government funding (4)			
Unclear that site by site approach (s.106) could not deliver the necessary improvements (1)			
No analysis of delay caused by the introduction of such schemes (1)			
Too much development has been permitted without securing necessary infrastructure (1)			
Lack of evidence base (6)			
Long distance traffic getting a free ride – should be tolled (2)			

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QUESTIONS	RESPONSES		
Q2. Do you think that all developments should contribute proportionately to the provision of the strategic transport capacity, or should it just be the larger schemes?	Total:36	19 All pay	2 Larger schemes
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
All developments should pay (21)			
Only the larger ones – a form of stealth tax – will affect overall site viability (4)			
Not properly related to Structure Plan Policy IMP1 (1)			
Problem of many schemes coming in just below threshold (1)			
Smaller schemes tend to be less well related to public transport (3)			
Only Ebbsfleet and Eastern Quarry should contribute to the A2 enhancements (1)			
Commercial and other major trip generators should contribute as well including rural schemes (9)			

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QUESTIONS	RESPONSES		
Q3. Do you agree with the suggested package of schemes listed above, bearing in mind that funding is limited and each scheme proposed requires a sound justification?	Total:33	20 Yes	7 No
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
All schemes will be required sooner or later (18)			
Are some estimated costs high enough (Dartford TC, UTCM, & A2) (2)			
Welcomes inclusion of Fastrack (3)			
Bean junction related to more issues than Eastern Quarry (1)			
Bean junction and Fastrack need to be brought forward (1)			
Conflict between need to reduce car travel and the fact 10 ex 11 are road schemes – need more investment on public transport (4)			
Risk to small scale improvements at known points of congestion (2)			
Hope that Hall Road junction includes Pepper Hill junction improvements (1)			
Lack of consultation (3)			
Local traffic should be separated from regional (1)			
Fastrack serves only new communities (1)			
Nothing on allocation or prioritisation of funding (1)			
Basis of cost estimated unclear – optimism bias needs to be included (1)			
Dartford Town centre improvements not strategic (1)			
Not a full package of schemes - more will be required (1)			
Mechanism for review is required (1)			

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QUESTIONS	RESPONSES	
<i>Q4. Are there any particular schemes that you would add or subtract from the list giving your reasons for this?</i>	Total:31	14 Add 1 Subtract
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)		
Remove Dartford Town Centre from scheme list (1)		
Should include public transport (only 1 scheme) and demand restraint measures (1)		
Should fund Green Grid network (1)		
What about flood works (1)		
Add – enhancement of village bus services, new Thames river crossing east of Gravesend (1)		
Dartford crossing tolls should be added to the 'kitty'		
Include A296 Watling Street with Bean interchange (1)		
More attention to traffic management, public transport and cycle routes (6)		
Need further information on A2 Demand Management – looks expensive (1)		
Schemes should not be removed from list (all appear needed) (1)		
Substitute public transport schemes for lower priority road schemes – no justification given for their not being included (1)		
Ebbfleet development should be providing STDR4 – as is partial funding for Ebbfleet junction upgrade (1)		
Adding/subtracting schemes should be in relation their public transport impacts (2)		
Add transport schemes to support Canal Basin/NE Gravesend e.g. Lion roundabout (1)		
Add bridge across railway from NE Gravesend to East of Canal Basin (1)		
Add Fastrack through Northfleet Embankment and reconnection of Cement Works to rail network (1)		
Need to factor in climate change – trolley buses (2)		
Improvements to Gravesend Town Centre (one-way system, ring road) (2)		
Should be recognised that some sites (e.g. Fastrack across Eastern Quarry) provide overall benefits to the area		

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QUESTIONS	RESPONSES		
Q5. Do you think that a flexible programme which is reviewed every year is better than one which is fixed, even if it means that the projects may change during the development period?	Total:33	5 Reviewed	2 Fixed
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
Needs to be a business plan setting out schemes, phasing and review – agreed with stakeholders (6)			
Phasing should be only element up for review (2)			
Will tariff decrease as schemes implemented and therefore cost of what's left falls? (1)			
Would prefer fixed tariff and fixed programme (3)			
Risk of disputes with stakeholders if expected schemes do not materialise (3)			
LDF needs to set out schemes and their trigger points (1)			
Operational framework needs urgent clarification (1)			
Certain amount of flexibility is needed (17)			

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QUESTIONS	RESPONSES		
Q6. The Planning system expects that when developers are asked to fund infrastructure, the Local Planning Authority can show a direct relationship between the need for the project and the development in question. Do you think that financial contributions to a flexible programme can meet this test? If not, how else could the need for flexibility be reconciled with the planning tests?	Total:31	10 Yes	3 No
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
Flexibility allowable with scope of development (1)			
Financial contribution must be kept within budget (1)			
Flexibility justified by length of time involved in major sites (1)			
Surprise developers prepared to fund remote off site works (1)			
Circular does allow pooling – but on a proportionate basis			
Circular 5/2005 requirements – tests need to be met and are not. Need to be met directly related to development (10)			
Loss of connection of improvements to local area (1)			
LPA to show linkage between sites and overall impact on area – provision of evidence of effects (2)			
Benefit needs to be to the area – not just strategic traffic passing through (2)			
Some areas may receive more funding than others due to need (1)			

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QUESTIONS	RESPONSES	
<i>Q7. How much flexibility do you think can be justified? Should this be limited to the timing of projects and their design, or do you think there should be enough flexibility to substitute one scheme for another or add more schemes if the transport impacts are not sufficiently contained?</i>	Total:31	
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)		
Flexibility within a project – not across projects unless very unforeseen circumstances arise (1)		
Flexibility can cost money (1)		
Need flexibility over such a long period – but keep projects and timing tight (2)		
Flexibility needs to be balanced with certainty (1)		
Need flexibility but also clearly defined mechanism for handling change (ideally not every year) with full consultation process (1)		
Flexibility diminishes link between need for the infrastructure and development (1)		
Only change schemes with full public consultation as to why (2)		
If less costly schemes substituted balance should be returned to the developer (1)		
Concern that the 11 scheme list is too restrictive (1)		
No flexibility to change schemes or substitution (2)		
Full flexibility (8)		
Flexibility in the design or phasing of a scheme (4)		
Must be direct relationship between development and scheme delivery (1)		

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QUESTIONS	RESPONSES		
Q8. Do you agree with the principle of the fixed tariff approach or would you suggest another route?	Total:32	23 Yes	8 No
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
Efficient and easy to use (1)			
KCC does not apply 10+ unit threshold in seeking education provision (1)			
Take account of the impact of Government Planning Gain Supplement (1)			
Tariff should cover all requirements not just transport (1)			
Charge in addition to standard s.106 (1)			
Gives developers a degree of certainty when appraising scheme viability (9)			
Requirement for upfront payments seems iniquitous (1)			
Should be direct relationship between impact caused and required mitigation (6)			
Trip based tariff			

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QUESTIONS	RESPONSES	
Q9. Do you consider that there is a threshold below which the tariff is not required? How do you think this can be justified?	Total:35	
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)		
Tariff should be based on income (1)		
All open market dwellings – affordable housing does not generate land value (1)		
10+ sites – significant cost on individual properties (2)		
No, every dwelling (10)		
15+ units (1)		
Not apply to Householder applications (1)		
Not all dwellings (1)		
Aligned with affordable housing threshold (2)		
Pro rata – but not on replacement dwellings (1)		
Need to manage schemes under 10 units to avoid slipping beneath (3)		
Should be net (2)		
Cover area south of A2 as well as north (1)		
Exclude area south of A2 (1)		
5+ units (2)		
No threshold (3)		
Risk of developers manipulating threshold (2)		

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QUESTIONS	RESPONSES	
Q10. Do you consider that £5000 per home is a reasonable and justifiable contribution towards the provision of strategic transport capacity, given the financial circumstances?	Total:33	21 Yes 11 No
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)		
How will you stop cost being passed on by the developer in inflating prices (2)		
Reasonable and justifiable (18)		
How is VAT dealt with? (1)		
Relationship to other off site improvements (transport) (1)		
Is the £20m contingency needed if there is flexibility in the programme (1)		
No analysis of benefits in relation to costs (1)		
Will reduce development in DA & GR (1)		
Higher than adjoining areas (1)		
Balance needs to be achieved with overall costs and revenues (1)		
Excessive amount – especially as schemes not fully costed (1)		
Is £5000 all if not more than the expected s.106 contribution? Can the tariff and other contributions be affordable (1)		

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QUESTIONS	RESPONSES		
Q11. Do you think that different rates should apply to differed types, sizes or locations of residential development? If so, how could a system be devised which is clear, predictable and equitable, and which does not lead to argument about site-specific impacts?	Total:33	Yes: 10	No:12
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
Developers should be means tested (1)			
No – would introduce more complications - flat rate is easy to understand (3)			
No – would increase administrative complexity (1)			
No – all development will benefit (though could have reduced rate for development with no car parking provision (1)			
Differentiate by housing types (1 bed flat versus 5 bed detached) (1)			
Attempting to agree level of impact would result in lengthy negotiations (1)			
Differentiate by amount of residential floor space (no. or size of rooms) (6)			
Net development not gross (1)			
Should not attempt to recover cost above actual cost (contrary to 5/2005) (1)			
Sites in sustainable locations will not generate same level of impact as other sites – tariff does not encourage trip reduction (1)			
Site by site basis related to actual impact (13)			
By a proportion of sales price – house prices may not keep pace with construction costs (1)			
Increase pro rata for properties above band 'D' (1)			
Quantify the cost of congestion delays (1)			

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QUESTIONS	RESPONSES		
Q12. Do you think that commercial developments should contribute to a strategic transport fund on a formula basis? Given the considerations above, how do you think a formula could be devised which is equitable and predictable?	Total:35	Yes 29	No 3
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
Contribute to traffic flows and damage roads (HGV's) (4)			
Floorspace or car parking provision could be used as basis (4)			
Based on uplift of land values (1)			
For local workers could result in contributions from both end of the trip (1)			
Use vehicle movements generated (1)			
Having worked out a scheme and its yield need to recalculate the residential tariff (1)			
Unfair if excluded (1)			
No likely to be very complicated (2)			
Yes – but lower rate than residential as local jobs an important part of reducing out commuting (2)			
Based on use classes and floorspace (2)			
Based on footprint of premises and the number of employees (1)			

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QUESTIONS	RESPONSES		
Q13. Do you consider that the example given for the phasing of payments is fair and workable? Can you suggest any other preferable means of phasing tariff payments?	Total:31	Yes: 18	No: 10
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)			
Yes – at practical completion/occupation (6)			
Yes – phased across development (6)			
Yes – all payments by 66% of completion of development (1)			
Yes – Grampian conditions to ensure schemes complete (1)			
Cash flow implications need to be understood (1)			
Site specific phasing where necessary (1)			
Mismatch between funds being needed by 2018 (from scheme schedule) and time period of tariff (1)			

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QUESTIONS	RESPONSES	
Q14. Do you agree with the use of the Construction Price Index? How else do you consider the fund can be protected from inflation?	Total:26	22 yes 2 no
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)		
Need to test the impacts of specific indices that could be used (1)		
Construction Price Index likely to be lower than inflation (1)		
What date is the cost indexed to (? April 2007) (1)		
What happens to funds between collection and being spent (1)		
Project costs need to verified in detail and stay fixed (1)		
Risk and reward contracts should be used (1)		

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QUESTIONS	RESPONSES	
Q15. Do you consider that these proposals provide adequate safeguards? Do you have any other suggestions for securing accountability?	Total:26	
COMMENTS/OBJECTIONS (NO. OF RESPONDENTS)		
Broad proposals seem adequate with safeguards (2)		
Accountable body needs to be independent, transparent and robust (2)		
Administration costs appear to take a large proportion of the costs (2)		
Assume Accountable body subject to external audit (1)		
Need to handle many elements of risk (1)		
Process must include adequate consultation processes with stakeholders (1)		
What happens to any surplus? (1)		
Needs to be a system for repaying funds should they not be expended (4)		
Stakeholders need to be assured that projects are being efficiently managed and delivered (1)		
Detailed assessment of cash flow required (1)		
Organisational arrangement need to be in place before money is collected (1)		
Need to demonstrate accountability (2)		

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