



# **Community Infrastructure Levy (CIL)**

## **Additional Evidence and Information Document**

**October 2018**

# 1. Introduction

1.1 This document has been formed to set out the Council's position with respect to a number of matters and evidence in order to provide context to the approach it has taken to forming the rates described in its Draft Charging Schedule. More specifically, the relevant matters and evidence addressed is listed below:

- The Council's position on the provision of 'In-kind' infrastructure in lieu of monetary Community Infrastructure Levy (CIL);
- The Council's position on selecting strategic sites for testing as part of its viability evidence base;
- The most prominent land use on which residential led development generally comes forward on, in order to provide context to the benchmark land values used in the Council's Viability Study;
- Information relating to gross to net floor space ratios achieved on residential led development in the borough;
- Information relating to monetary S106 amounts secured through development proposals permitted since the adoption of the Council's current CIL Charging Schedule;
- Information relating to Internal Rates of Return achieved on Strategic Sites;
- Clarification in terms of the approach to the establishment of development timescales for strategic sites;
- Clarification of the approach to allowing for build costs in its Viability Study; and
- Clarification of the Council's position on decisions made by the Examiner in respect of the Council's adopted Charging Schedule.

## **2. Using CIL ‘In-Kind’ measures to deliver infrastructure on development sites**

- 1.2 This section will set out the Council’s position on accepting land and/or physical infrastructure in lieu of monetary CIL and how this position is taken account of in the appraisals supporting the Council’s CIL Viability Evidence Base.
- 1.3 Provisions relating to Charging Authorities being able to accept land and/or infrastructure in lieu of monetary CIL can be found in:
  1. The CIL Regulations 2010 (as amended): Regulations 73, 73A, 73B and 74.
  2. CIL Planning Practice Guidance: Paragraphs 61 to 64.
- 1.4 The principle of CIL in-kind measures are that a developer can provide land or physical infrastructure onto an authority in lieu of a proportion of or a full CIL liability. For the purposes of this document, where a developer provides land in lieu of monetary CIL, it is known as a “Land Payment”. Where a developer provides physical infrastructure in lieu of monetary CIL, it is known as an “Infrastructure Payment”.
- 1.5 CIL Regulation 73 sets out the requirements relating to Land Payments. It directs a broad methodology for entering into an agreement that involves a valuation process to establish the amount of monetary CIL the provision of a piece of land will equate to in respect of a party’s CIL liability. The valuation is carried out by an independent party.
- 1.6 CIL Regulation 73A sets out the requirements relating to Infrastructure Payments. Essentially, an Infrastructure Payment should equate to the cost to the developer of delivering the infrastructure in question. The amount of an Infrastructure Payment is determined by an independent party.
- 1.7 Following the establishment of the amount(s) that will be secured via Land and Infrastructure Payments, the Council then enters into a formal agreement with the party liable to pay CIL. This agreement sets out the obligations of the parties relating to the delivery of the infrastructure, including the discount to the overall monetary liability and information relating to the timings of the provision of the land/infrastructure.
- 1.8 The Council has entered into one such agreement to deliver a school on the Millharbour Village development site and is in advanced discussions regarding entering into another agreement to deliver a Primary School on another site.

- 1.9 For the purposes of the Council's CIL Viability evidence base, the Council has assumed that all infrastructure allocated for provision on the Council's site allocations will be delivered using CIL in-kind measures. This negates the need to include separate costs for the delivery of infrastructure as these costs will in reality be reduced from a relevant party's monetary CIL liability.
- 1.10 The reason the Council has taken this approach is because:
- All of the types of social infrastructure allocated on the Council's site allocations are included on the Council's proposed Regulation 123 List, meaning that the Council intends to secure these types of infrastructure using CIL. As such, the only appropriate mechanism to do so is via a CIL "In-Kind" Agreement. The fact that the types of infrastructure allocated on the Council's site allocations are included on the Council's Regulation 123 List means that the Council would not be in compliance with the CIL Regulations if it were to seek the delivery of allocated infrastructure using Section 106 planning obligations.
  - Securing allocated infrastructure using S106 planning obligations is unlikely to comply with the current CIL Regulations. Because the infrastructure to be secured on site allocations is strategic infrastructure that will serve a population wider than that produced by the development site then delivering the infrastructure using S106 planning obligations wouldn't comply with the requirements of paragraph 122 (2) (c) which requires that planning obligations must be "fairly and reasonably related in scale and kind to the development".
- 1.11 The Council is aware that parties who have submitted representations have concerns over the CIL In-Kind approach. Whilst the Council accepts that the CIL Regulations in general and with reference to payments in kind are somewhat unclear, the Council has decided that, on balance, it is currently the most reasonable and appropriate approach to assume strategic infrastructure can be delivered on the Council's strategic sites using CIL 'In-Kind' measures. If amendments to the CIL Regulations are made in due course then the Council may change its position.

### **3. How the Council have selected sites for viability testing**

1.12 This section seeks to clarify how the Council has selected the strategic sites tested in the Viability Study supporting its Charging Schedule.

1.13 The Council's overarching approach to selecting sites for testing has involved undertaking a sampling exercise that focuses on sites on which the Council's new Local Plan will rely whilst avoiding excessive detail.

1.14 Guidance relating to viability testing of Local Plans describes that not every site needs to be tested. In particular, paragraph 6 of the Viability and Plan Making Planning Practice Guidance states:

*“Assessing the viability of plans does not require individual testing of every site.....Assessment of samples of sites may be helpful to support evidence and more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies”.*

1.15 In addition, a number of further practical matters have been considered, including the following:

- Policy requirements of residential development are much more likely to impact on viability, so testing has focused on residential led schemes.
- Testing the sites that propose to deliver the most housing (i.e. contribute most to the delivery of the Local Plan).
- Not testing sites where there is a planning permission in place that is likely to be delivered or has already been implemented.
- Where a number of sites have similar characteristics, only one of these sites has been tested.
- Testing the sites that have the most significant cost burdens which may include the provision of on-site social infrastructure.
- Where there may not be sufficient information to facilitate the robust testing of a site then the site has not been tested.

#### **4. Viability, Planning and Development Context: Significant schemes granted permission since the Council adopted its CIL**

- 1.16 This section will analyse data from permissions on schemes providing 10 or more residential units granted by the Council between the 1<sup>st</sup> April 2015 (which is when the Council's adopted CIL Charging Schedule came into effect) and the 29<sup>th</sup> March 2018. Data from these permissions is going to be the most appropriate to use for analysis purposes as they will provide a reasonable sample of planning permissions to analyse. In addition, these permissions were granted under the Council's adopted CIL Charging Schedule so are subject to a similar planning/development context as schemes moving forward.
- 1.17 More specifically, the aim of this section is to provide some evidence to help establish the most appropriate approach the Council should take to some of the assumptions included within the Council's Viability Study as well as the interpretation of the study's results. The aspects of the Council's Viability Study that will be considered are:
- Development efficiencies (otherwise known as 'gross to net ratio'): This is a metric used to establish the ratio between the floor space constructed against the floor space that attracts a value. This is calculated by dividing the net internal area (or net sales area) floor space by the gross internal area of the development. Consideration of this matter will help the Council to consider the most appropriate ratio to apply to its viability appraisals.
  - Residual S106 assumptions: Following the adoption of CIL, the Council still secures S106 contributions for non-infrastructure items. These are specific to the site in question and represent a cost to the developer. Consideration of this matter will help the Council establish how much per residential unit the Council should allow in terms of S106 payments.
  - Land uses being brought forward for development: The Council's Viability Study undertakes testing of generic development typologies assuming four different benchmark land values. Consideration of this matter will help the Council interpret the results of its Viability Study more effectively, establishing the benchmark land value assumptions that should be given greater weight.
- 1.18 In terms of the methodology the Council has undertaken to analysing the set of information, the Council:
1. Undertook a search for all 'major' residential led planning applications permitted since the 1<sup>st</sup> April 2015.

2. Associated each of the applications with one of the generic typology schemes tested, on the basis of the number of units being offered by the scheme.
3. Reviewed application documents, such as application forms, accommodation schedules and final S106 Agreements to establish the information required for each of the permissions.
4. Undertook an analysis of the results of the data collected to establish how the Council's Viability evidence base can be more accurate.

1.19 Please refer to Appendix A for the data the Council has analysed to ensure its approach to evidence is appropriately informed. Please find below a description of the results of the analysis undertaken.

**Development efficiencies (gross to net ratio)**

1.20 The following table shows the assumptions for development efficiencies made in the Viability Study supporting its PDCS against the average development efficiency of proposals granted permission.

Table 1

Information in PDCS Stage Viability Study		Average development efficiency by typology	Notes
Typology in Viability Study	Development efficiency		
1	N/A	N/A	3 exclusions:  • PA/14/03003 (no data available);  • PA/17/00028 (no data available);  • PA/14/03424 (seems to be an anomaly).
2	0.8	N/A	
3	0.8	0.86	
4	0.8	0.81	
5	0.75	0.83	
6	0.75	0.81	
7	0.75	0.81	
8	0.75	0.82	
9	0.75	0.81	
<b>Strategic Sites</b>	0.75	0.77	

1.21 It is clear from table 1 above that the assumptions in the Council's Viability Study that supported its PDCS are conservative.

**Residual S106 assumptions**

1.22 The research and analysis undertaken involves establishing the S106 payments for the sample of permissions that would apply in the event that the schemes were technically policy compliant. For example, a lot of the permissions in the sample failed to meet the Council's carbon reduction policy requirements so are required to make a "carbon offset" payment to mitigate the deviation from the Council's

requirements. Because the Council's Viability Study allows for build costs for zero carbon development, the Council can therefore exclude this payment from being included in the data.

1.23 Only payments that would be payable on schemes if the scheme in question was policy compliant are appropriate to include within the dataset. These payments will comprise of:

- Construction Phase Skills and Training Contributions: This financial contribution is sought to support and provide the training and skills needs of local residents in accessing the new job opportunities in the construction of development.
- End User Phase Skills and Training Contributions: This financial contribution is sought to support and provide the training and skills needs of local residents in accessing the new job opportunities created by the development.
- Other site specific contributions, such as those requested by Transport for London for site specific transport improvements.

1.24 Table 2 below sets out the Council's findings regarding residual S106 payments:

Table 2

Information in PDCS Stage Viability Study		Average residual S106 payment by typology	Notes
Typology	Residual S106 per unit in Viability Study		
1	£1,220	N/A	<ul style="list-style-type: none"> <li>• 1 exclusion: PA/14/03003 (no data available);</li> <li>• 2 permissions (PA/16/01538 and PA/17/00028) that contribute to the results associated with typology three have been identified as potential anomalies although they have not been excluded from the results as these are the only 2 permissions that relate to this typology.</li> </ul>
2	£1,220	N/A	
3	£1,220	£911.50	
4	£1,220	£501.78	
5	£1,220	£578.21	
6	£1,220	£709.30	
7	£1,220	£384.79	
8	£1,220	£373.92	
9	£1,220	£634.77	
<b>Strategic Sites</b>	£1,220	£625.78	
<b>Average</b>	£1,220	£575.84	

1.25 It is clear from table 2 above that the assumptions in the Council's Viability Study that supported its PDCS are conservative. The Council has decided to retain the assumed allowance of £1,220 per unit within



the Viability Study supporting the Draft Charging Schedule to make sure this assumption incorporates a built-in buffer.

### Land uses being brought forward for development

- 1.26 The use of land on which development will be brought forward is a significant factor that influences the viability. In terms of the typology testing undertaken, the schemes have been tested against four different benchmark land values (against which the residual land value is compared) based on four different land uses. The benchmarks tested at Preliminary Draft Charging Schedule stage are set out in table 3 below:

Table 3

	<b>Use</b>
<b>1</b>	<b>Higher Value Secondary Offices</b>
<b>2</b>	<b>Medium Value Secondary Offices</b>
<b>3</b>	<b>Lower Value Secondary Offices / Community Use</b>
<b>4</b>	<b>Secondary Industrial/ Warehousing</b>

- 1.27 Whilst the values for the above benchmarks have been updated in the Viability Study supporting the consultation on the Draft Charging Schedule, the uses remain the same.
- 1.28 The Council has undertaken an exercise to establish the type of land use on which planning permissions granted in the Tower Hamlets charging area predominantly comes forward. This involved analysing the schemes granted permission between the 1st April 2015 (which is when the Council's adopted CIL Charging Schedule came into effect) and the 29th March 2018. The results are summarised in table 4 below:

Table 4

	<b>Use</b>	<b>No. of permissions granted under this benchmark</b>	<b>% of permissions granted under each benchmark</b>
1	Higher Value Secondary Offices	1	4.00%
2	Medium Value Secondary Offices	0	0.00%
3	Lower Value Secondary Offices / Community Use	10	40.00%
4	Secondary Industrial/ Warehousing	14	56.00%
	<b>Total</b>	<b>25</b>	<b>100%</b>

- 1.29 The exercise undertaken clearly demonstrates that the vast majority of development comes forward against benchmarks 3 and 4 inferring

that greater weight should be applied to the results of the typology appraisals where testing is undertaken against benchmarks 3 and 4.

## **5. Profit on large development and Internal Rate of Return as a measure of profit**

- 1.30 This section seeks to clarify the approach to profit taken in respect of the larger strategic sites tested in the Viability Study supporting the Council's Draft Charging Schedule.
- 1.31 Internal Rate of Return (IRR) has been adopted as the measure of profit for 5 of the largest strategic sites tested. The sites are:
- Bishopsgate Goods Yard.
  - Billingsgate Market.
  - North Quay.
  - Crossharbour Town Centre.
  - Leven Road Gas Works.
- 1.32 The Viability Study supporting the Council's Draft Charging Schedule describes that BNP Paribas are aware of developers proceeding with the development of schemes that generate an IRR of 13%.
- 1.33 It is challenging to produce evidence to support 13% IRR (or indeed any % of IRR) as representing the appropriate threshold at which major development will come forward. To help establish whether assuming a 13% IRR is reasonable, the Viability Study also sets out the profit on these schemes as a % of Gross Development Value to allow benchmarking against other schemes tested in the Viability Study. The Council is aware however that for larger, multi-phased schemes coming forward over a long period of time and often having significant upfront infrastructure costs, developers have submitted their viability assessments on an IRR basis.
- 1.34 Appeal decisions relating to the matter of IRR are very limited, due to the rarity of schemes against which this method of profit applies. One recent appeal (ref APP/W5780/W/16/3164036) provides some guidance of at what level of IRR a scheme will proceed. Both the appellant and their consultants as well as the London Borough of Redbridge and their consultants agreed that an ungrown IRR of 12.4% reasonable as a target rate of return was acceptable. The Council notes the specific nature of the scheme underpinning this appeal case and the ways it may vary from the strategic sites tested in the Viability Study but considers it a reasonable proxy to consider in the absence of better information.
- 1.35 The Council is also aware of the level of IRRs deemed acceptable during the course of site specific negotiations for sites within Tower Hamlets. These schemes identified that ungrown IRRs i.e. at current costs and values, were still deliverable despite not being at or above 20%. The 20% target was to be achieved through growth.

## **6. The approach to development programmes**

- 1.36 This section seeks to clarify the approach the Council has taken to establish the development programmes for the testing undertaken in its Viability Study.
- 1.37 The approach taken in the Council's Viability Study is based upon the experience of such schemes by BNP Paribas Real Estate and of Council officers who consider the development programmes adopted to be reasonable.

## **7. The approach to build costs**

- 1.38 This section seeks to clarify the approach the Viability Study takes in terms of the application of build costs.
- 1.39 The Viability Study supporting the Preliminary Draft Charging Schedule uses base build costs that are sourced from the RICS Building Cost Information Service (BCIS), which is based on tenders for actual schemes and is adjusted to reflect local circumstances in Tower Hamlets. It should be noted that professional Build Cost Consultants WT Partnerships provided advice on the BCIS base build cost rates adopted. On top of the base build costs allowances have been made for external works and where appropriate abnormal costs (see below). In addition, the Council sought specific advice from WT Partnership who have provided advice in respect of additional policy costs including that associated with delivering Sustainable Urban Drainage Systems, meeting the Council's draft carbon zero policy and also in respect of meeting accessibility requirements for residents with wheelchairs. A contingency allowance of 5% on top of build costs has also been allowed.
- 1.40 The Council has commissioned WT Partnerships to provide an update of its build costs adopted in the Viability Study supporting the Draft Charging Schedule. The approach to updating the build costs in respect of the typology testing has been approached by WT Partnerships in two ways, by looking at the addition of an allowance for inflation on top of the 2016 costs and by reviewing on a benchmark basis i.e. reviewing the costs of actual schemes in Tower Hamlets and the surrounding area, which best reflects the anticipated development. The latter is a mixture of actual costs, tendered costs and developer and quantity surveyor's estimates.
- 1.41 In terms of the testing of strategic sites in the Viability Study supporting the Draft Charging Schedule, the Council has again commissioned WT Partnership. WT Partnership has provided site specific advice in respect of costs that should apply in the case of the strategic sites tested. This approach has been undertaken in response to representations submitted.

## **8. The Examiner's report on the Council's current Charging Schedule**

- 1.42 This section seeks to clarify the Council's approach to its new Charging Schedule in the context of the Examiner's report on the Council's adopted Charging Schedule.
- 1.43 The Examiner's report on the Council's adopted Charging Schedule has been taken into consideration in the formation of the evidence to support the newly proposed Charging Schedule. However, the Council's approach must be directed by the provisions of the Planning Act 2008, the CIL Regulations and relevant Planning Practice Guidance.
- 1.44 Section 211(7A) of the Planning Act 2008 requires that "appropriate available evidence" must be used to inform a Draft Charging Schedule. Given a significant amount of the evidence that supported the Viability Study for the Council's adopted Charging Schedule was collected in mid-2013, it would be incorrect for the Council to apply much weight to the Examiner's report for its adopted Charging Schedule, the economic circumstances of development has changed significantly since this point.
- 1.45 The Council has undertaken robust viability testing which has to supersede decisions made by an Examiner that were based on different circumstances.

**Appendix A: Analysis of planning permissions granted between the 1<sup>st</sup> April 2015 and the 29<sup>th</sup> March 2018 in respect of S106 contributions, gross to net ratio and use of land of existing site**

PA Ref	Site Address	Which Typology Scheme most similar to?	Residual S106 Allowances			Gross to Net Ratio (%)		Land Use of Site in Existing Use	
			S106 financial contributions secured (excluding carbon offset)	S106 contributions per unit	Use for data compilation purposes?	Gross to Net Ratio	Use for data compilation purposes?	Land use of site at the point of planning application (as per application form)	Which Benchmark is Land use most similar to
PA/14/01246/A1	Enterprise Business Park, 2 Millharbour, London	Strategic Site	£265,889 Employment and Enterprise £100,000 public art Total: £365,889	£403.41	Yes	0.75		Vacant, cleared site (since 1996)	4
PA/14/01946/EX	62-66 Cavell Street, London, E1 2JA	4	Monitoring: £1,500 Enterprise and employment: £2,242 Total: £3,742	£311.83	Yes	0.83		Vacant site with vegetation and hoarding at perimeter.	4
PA/14/03166/A1	Bethnal Green Mission Church, 305 Cambridge Heath Road, London, E2 9LH	4	Monitoring: £2,000 Employment: £8,376 Total: £10,376	£691.73	Yes	0.80		Church/Community Centre	3
PA/14/03424/EX	281-285 Bethnal Green Road, London, E2 6AH	5	Monitoring Fee: £314.78 Employment and Enterprise: £5,839.00 Total: £6,153.78	£293.04	Yes	0.98	No - seems to be an anomaly	Warehouse	4
PA/14/03594/A1	Hercules Wharf Castle Wharf And Union Wharf, Orchard Place, London, E14	Strategic Site	Bus-stops: £399,000 Construction Phase Employment Skills and Training: £355,620 End User Commercial Phase Employment skills and Training: £45,878 Monitoring: £5,000 Total: £805,498	£1,001.86	Yes	0.77		Class B1c/ B2, B8	4
PA/14/03660/A1	219-221 Bow Road and 27-31 Payne Road, Bow, London E3	7	Employment and Enterprise: £28,788 Monitoring Fee: £3,000 Total: £31,788	£357.17	Yes	0.83		Vacant - previously warehouse, workshop, 2 x residential apartments and car parking	4
PA/15/00039/A1	Land At 160 To 166, Chrisp Street, London	5	Skills and Training Contribution: £17,547 Monitoring fee: £500 Total: £18,047	£71.05	Yes	0.79		"industrial buildings"	4

PA Ref	Site Address	Which Typology Scheme most similar to?	Residual S106 Allowances			Gross to Net Ratio (%)		Land Use of Site in Existing Use	
			S106 financial contributions secured (excluding carbon offset)	S106 contributions per unit	Use for data compilation purposes?	Gross to Net Ratio	Use for data compilation purposes?	Land use of site at the point of planning application (as per application form)	Which Benchmark is Land use most similar to
PA/15/01789/A1	Site Bound by Raven Row, Stepney Way Sidney Street, London E1	Strategic Site	Construction Phase Employment Skills and Training: £211,104 End User Commercial Phase Employment skills and Training: £86,715 Bus facilities: £40,000 Monitoring: £5,000 Total: £342,819	£607.84	Yes	0.81	Yes	Storage (b8) and temporary pop up sport facility.	4
PA/15/02045/A1	221 Burdett Road, London, E3 4AR	5	Construction phase skills and training: £7,916 Pedestrian Crossing Contribution: £10,000 Monitoring fee: £18,000 Total: £35,916	£1,330	Yes	0.79	Yes	Poor quality petrol filling station buildings and hardstanding	3
PA/15/02148/A1	Our Ladys Primary School, Copenhagen Place, London, E14 7DA	6	Skills and Training Contribution: £16,432 Monitoring Contribution: £2,000 Total: £18,432	£409.60	Yes	0.89	Yes	Vacant - Formerly Primary School	3
PA/15/02156/A1	Attlee House, Sunley House, Profumo House and College East, 10 Gunthorpe Street, London	6	Construction, skills and training: £32,172.00 End User Commercial Phase Employment skills and Training: £46,899.00 Monitoring Fee - £3,000 Total: £82,071	£1,302	Yes	0.81	Yes	Mixed use - office, advice services, residential and HMO	3
PA/15/02675/B1	Hertsmere House, 2 Hertsmere Road, London	Strategic Site	£421,364 Construction Phase Employment Skills and Training £4,500 Monitoring Fee Total: £425,864	£490	Yes	0.76	Yes	The site is currently occupied by a four/five storey office building	1
PA/15/03073/B1	South Quay Plaza 4, Marsh Wall, London, E14	9	Construction, skills and training: £161,452. End User Commercial Phase Employment skills and Training: £1,200 Bus Improvements Contribution: £200,000 Monitoring fee £8,500 Total: £371,152	£937.25	Yes	0.83	Yes	Vacant	4



PA Ref	Site Address	Which Typology Scheme most similar to?	Residual S106 Allowances			Gross to Net Ratio (%)		Land Use of Site in Existing Use	
			S106 financial contributions secured (excluding carbon offset)	S106 contributions per unit	Use for data compilation purposes?	Gross to Net Ratio	Use for data compilation purposes?	Land use of site at the point of planning application (as per application form)	Which Benchmark is Land use most similar to
PA/16/01041/A1	42-44 Thomas Road, London	8	Construction, skills and training: £62,256 End User Commercial Phase Employment skills and Training: £3,046 Monitoring: £3,500 Total: £68,802	£373.92	Yes	0.82	Yes	Cash and carry (Use Class A1) and ancillary office space.	3
PA/16/01538/A1	34-40 Bow Road, London	3	Play space contribution: £13,230 Monitoring: £4,000 Total: £17,230	£1,723	No - specific site mitigation for child play space required.	0.86	Yes	Open amenity space associated with 34-40 Bow Road.	4
PA/16/01763/A1	Castle Wharf Esso Petrol Station, Leamouth Road, London, E14 0JG	9	Construction, skills and training: £98,596 End User Commercial Phase Employment skills and Training: £11,220 Monitoring: £2,500 Total: £112,316	332.295858	Yes	0.80	Yes	Vacant suis generis petrol filling station	3
PA/16/02140/A1	Leven Wharf (known as Glaucus Works), Leven Road, London, E14 0LP	7	Construction, skills and training: £61,984.77 Monitoring: £4,000 Total: £65,984.77	£412.40	Yes	0.79	Yes	Vacant former industrial use (metal galvanisers)	4
PA/16/02605/A1	(Locksley Estate Site A) Immediately To The North of 86-144, Rhodeswell Road, London	5	N/A - Council scheme	N/A - Council scheme	No as N/A	0.82	Yes	An underused car park is located to the south of the site. An area of hard standing in the centre of the site is used to store site cabins and shipping containers used for building works in the area. To the north of the site are a group of mature trees surrounded by soft landscape.	4
PA/16/02789/A1	William Brinson Centre, 3-5 Arnold Road, London, E3 4NT	6	N/A - Council scheme	N/A - Council scheme	No as N/A	0.75	Yes	Adult day learning centre	3

			Residual S106 Allowances			Gross to Net Ratio (%)		Land Use of Site in Existing Use	
PA Ref	Site Address	Which Typology Scheme most similar to?	S106 financial contributions secured (excluding carbon offset)	S106 contributions per unit	Use for data compilation purposes?	Gross to Net Ratio	Use for data compilation purposes?	Land use of site at the point of planning application (as per application form)	Which Benchmark is Land use most similar to
PA/16/02842/A1	38-44 White Horse Road, 611-613 & 619-623 Commercial Road, Limehouse, London E1	5	Construction Employment Skills Contribution: £8,796 Employment Skills and Training: £2,898.50 Monitoring Fee: £2,500 Total: £14,194.5	£645.20	Yes	0.93	Yes	retail at ground floor with ancillary storage	3
PA/16/02878/A1	11-31 Toynbee Street and 67-69 Commercial Street, London	5	Construction, Employment, Skills Training contribution: £13,088 End user phase skills and training contribution: £2,550.73 Monitoring fee: £3,500 Total: £19138.73	£832.12	Yes	0.83	Yes	11 derelict commercial units	3
PA/17/00028/A1	62-66 Cavell Street, London, E1 2JA	3	Monitoring fee: £1,000 Total: £1,000	£100	No - exceptional case where financial S106 not able to be charged.	Information not available.	No - data not available	Vacant site with vegetation and hoarding at perimeter.	4
PA/17/00254/A1	3-19 Caroline Street, London, E1 0JG	5	Construction Employment Skills Contribution: £6,148 Monitoring Fee: £1,000 Total: £7,148	£297.83	Yes	0.80	Yes	Class B8 Storage and Distribution	4
PA/17/00732/A1	Land Bounded By Watts Grove And Gale Street, London, E3	6	Employment, Skills, Training and Enterprise Projects Contribution: £23,560.00 Monitoring Fee: £3,500 Total: £27,060	£416.31	Yes	0.71	Yes	Vacant site, previously used as open storage.	4
PA/14/03003/A1	24-26 Bow Road, London	7	Monitoring: £1,000 Total: £1,000	£9.70	No - exceptional case where financial S106 not able to be charged.	Information not available.	No - data not available	Used Car Dealership with Class B1(a) offices	3