

Sub-Regional Infrastructure: Planning and Delivery Summary of Study Outcomes

Purpose of report

1. To provide members with a summary of the key outcomes of a recent sub-regional study of infrastructure requirements and delivery issues undertaken by consultants on behalf of the Partnership.
2. To consider the further work to be undertaken towards clarifying sub-regional infrastructure requirements and delivery issues.

Background

3. The Partnership has received a study from consultants (Roger Tym and Partners with URS) that identifies and appraises the strategic infrastructure requirements of growth at the key development locations of the sub-region as identified by the Regional Spatial Strategy (RSS). Prospects for meeting these requirements, in particular for funding, and the implications for critical development thresholds, investment priorities and development trajectories, are identified by the study.
4. The key development locations identified by the study are as follows:
 - Bath urban extension
 - Option 1 South of Bath and straddling the A367;
 - Option 2 South of the A4, west of Bath
 - Keynsham
 - SE of Bristol- proposed urban extension
 - Bristol City Centre (including St Philips)
 - South Bristol incl. Hengrove Park
 - North Bristol
 - Avonmouth/Sevenside
 - Weston Town Centre and proposed urban extension
 - South West of Bristol- proposed urban extension
 - North Fringe of Bristol including proposed urban extension west of the M32
 - East Fringe of Bristol including Emersons Green and proposed urban extension
 - Yate and Chipping Sodbury.
5. The study will inform the preparation of the Joint Integrated Investment and Delivery Plan being prepared by the Partnership and government agencies through the 'Single Conversation'. It will support the integrated working of partners in planning for sustainable and mixed communities as proposed by the Multi-Area Agreement (MAA). Finally, the study will inform the Infrastructure Delivery Plans being prepared

by the four local councils in support of their Core Strategies and other local development plan documents.

Study approach and structure

6. The approach of the study seeks to provide three broad outcomes as follows:

- Informing partners about the key infrastructure needed to support growth at key development locations, and the costs and funding of this infrastructure
- Assessing growth barriers, infrastructure dependencies, available funding and development viability to understand infrastructure funding gaps, the implications for development progress and delivering development targets
- Identifying what the public sector can do to support the delivery of key development sites by means of an action plan to influence wider strategic management and policy choice.

7. The structure of the study report is as follows:

- Assessing the viability of growth at the key development locations and the scale of development funding (contributions) likely to be available for the strategic infrastructure required to support growth
- Assessing requirements for, and costs of strategic or primary 'big ticket' infrastructure (transport, education and parks/open space) and other 'abnormal' infrastructure requirements arising from the need to overcome barriers to development (mainly drainage and flood prevention) at the key development locations, and the mainstream funding likely to be available
- Identifying 'growth barriers', at sub-regional and key development location levels
- Appraising the implications of funding shortfalls and 'growth barriers' for development trajectories
- Recommending ways of overcoming funding shortfalls and infrastructure constraints on growth at the key development locations.

Key Outcomes

8. The Executive Summary of the final report is appended. A brief summary of key outcomes is set out below.

- Current property market conditions render the residential development of uncommitted sites¹ at the key development locations to be not viable and unable to generate any funding to enable development contributions towards strategic infrastructure. This assumes that new residential development on uncommitted sites would provide for 35% of new units being affordable and that it would meet Level 5 of the Code for Sustainable Homes.

¹ The study examines prospects for growth at sites and locations without planning permission ('uncommitted growth') on the grounds that they have outstanding infrastructure requirements. Sites with planning permission are deemed to have the necessary infrastructure.)

- With full property market recovery, many suburban and Greenfield sites at the key development locations would become viable and able to meet the affordable homes and sustainable building standards set out above. Urban sites however would remain not viable or only able to generate small surplus funds from which development contributions could be drawn.
- Reducing requirements for affordable homes and meeting Level 3 rather than Level 5 of the Code for Sustainable Homes would much improve development viability and the potential scale of development contributions towards strategic infrastructure. Under the assumptions about the scale of growth used by the study², the estimated level of development contributions would rise from £500m to £1.5bn. Using lower assumptions about land values would have similar consequences with the scale of development contributions estimated to rise from £500m to £800m under the growth assumptions used by the study. Using these alternative assumptions about affordable housing contributions and building standards, some development sites become viable even in depressed market conditions. They become significantly more attractive to developers with a full recovery of the property market.
- A large number of transport schemes are identified as required to support growth at the key development locations. Several of these schemes are not likely to be completed until 2021. These schemes are estimated to cost £635m while schemes required to address historic deficits are estimated to cost £1.1bn. Comparing costs of required schemes with allocated mainstream funding shows a large shortfall of funding- £950m. If this gap cannot be bridged, it is likely that with the scale of growth assessed, travel conditions in the sub-region would become far worse.
- Uncertainties about transport requirements and funding are likely to constrain bringing forward major new development at South East Bristol, the East Fringe, Yate and Avonmouth/Sevenside. Further studies at a range of locations are required to clarify the relationship between the progress of development and the timing of transport.
- The overall cost of strategic infrastructure is estimated at £2.5bn (comprises £1.7bn for transport, £620m for education and £170m for parks, open space and leisure). Costs per dwelling vary sharply between key development locations.
- Substantial investment in sewerage is required to enable proposed growth levels to be accommodated at all locations apart from Bath City Centre, Bristol City Centre and North Bristol. Keynsham, South West Bristol urban extension, Yate and the Bath urban extension will only be able to meet the sewerage requirements of substantial growth beyond 2015. South East Bristol urban extension, the southern part of the North

² The level of growth assessed by the study is drawn from the Regional Spatial Strategy (RSS) Proposed Changes. The study acknowledges the major reservations of West of England UAs and the Partnership about the scale of change shown by the Proposed Changes, in particular the capacity of the sub-region to accommodate the scale of growth put forward. The study also acknowledges that the UAs may exercise their legal right to challenge the decision of the Secretary of State on the RSS.

Fringe and the East Fringe will not be able to take any development until beyond 2015.

- Flood risk issues are most significant at Avonmouth/Sevenside. Flood risk issues also arise in Bristol and Bath city centres and at the South West Bristol urban extension.
- Owing primarily to viability problems and transport barriers, the start dates for uncommitted sites is likely to be delayed until 2014. As a result of these delays, when using realistic build-rates some 59,300 dwellings are likely to be built at the key development locations compared with 104,600 required by RSS Proposed Changes. Relaxing requirements for development contributions or accepting higher levels of congestion would enable more dwellings to be built.
- A large number of ways of overcoming growth barriers and raising the potential number of dwellings to be built are identified as listed below.
- Agreeing an action plan that would show where planning effort and resources are to be concentrated and the ordering of priorities between sites based on an integrated view of which sites are both deliverable and desirable in terms of planning considerations.
- Reviewing through the preparation of the action plan the sequencing and prioritising of sites and assembling short-term, medium term and long term development and investment programmes, focusing on the higher priority sites, minimising funding gaps by concentrating efforts on sites that are 'infrastructure cost efficient', prioritising transport schemes that bring maximum development benefit, focusing on issues that represent critical barriers to development, considering sequencing a careful mix of brownfield and Greenfield sites in order to reduce the impacts of viability constraints on development delivery, addressing gaps in the planning and transport strategy.
- Reviewing planning and transport strategies and requirements to address gaps in the current framework and reduce impacts on development viability.
- Reviewing strategy delivery mechanisms including the development of a strong rationale for developer contributions, influencing master plan content and urban design to ensure that it is development friendly, de-risking sites by upfront site and infrastructure funding, establishing new delivery arrangements and innovative funding packages, reviewing the procurement and use of public facilities and selecting developers who are well-placed to bring forward development and contribute to infrastructure funding.
- The Community Infrastructure Levy (CIL) offers the potential for a framework for facilitating the funding of sub-regional infrastructure. To establish a CIL, West of England authorities would need to agree in principle that working together on a joint charging schedule is desirable and an understanding that issues are collective in some way and could

be solved by joint action. The issues to be covered by CIL would then be the subject of further work. Even without a commitment to CIL, the preparatory work would inform the setting of S106 contributions to strategic infrastructure and the drafting of aligned contributions policies across the sub-region.

Further work towards determining and delivering the sub-regional infrastructure requirements of growth

9. The Partnership is committed to working with government agencies through the 'Single Conversation' towards a Joint Integrated Delivery and Investment Plan. The Plan will include a revised development trajectory that reflects current planning priorities and associated requirements for infrastructure investment.
10. The Sub-Regional Infrastructure Study prepared by Roger Tym & Partners will contribute to formulating the development trajectory and establishing associated infrastructure requirements to be shown by the Joint Integrated Delivery and Investment Plan. The advice provided about the deliverability of locations and the resulting development trajectory, as acknowledged by the study, will need to be combined with an agreed view about where growth is desirable given wider planning considerations and the priorities of the Unitary Authorities.
11. The advice provided by the study represents a strategic and long-term overview. In using the study outcomes, recognition will need to be given when assembling short-term development programmes to requirements for further work to clarify development and infrastructure issues. Recognition will also need to be given to the uncertainties arising out of the complexity of the subject, in particular about development costs, property and land values, and above all about preferred development locations, subsequent detailed development proposals and the implications for infrastructure requirements. The outcomes of the study therefore will need to be kept under review with recognition given to the prospect of further more detailed work being required to secure greater clarity and certainty about infrastructure and funding issues arising over the short-term at specific locations.

Recommendation

12. Members are invited to note the report and offer views.

Appendices

Responding to infrastructure delivery and planning issues in the West of England. Roger Tym & Partners with URS for the West of England Partnership. October 2009

Author: Tim Lansley, West of England Partnership
Tel: 0117 9036866 Email: Tim.lansley@westofengland.org

ITEM 7 - APPENDIX

West of England Partnership RESPONDING TO INFRASTRUCTURE DELIVERY AND PLANNING ISSUES IN THE WEST OF ENGLAND



TYM & PARTNERS
Planners and Development Economists

with transport input from **URS**

Executive Summary
October 2009

ROGER TYM & PARTNERS

Fairfax House
15 Fulwood Place
London
WC1V 6HU

t (020) 7831 2711
f (020) 7831 7653
e london@tymconsult.com
w www.tymconsult.com

This document is formatted for double-sided printing.

EXECUTIVE SUMMARY

- 1 This is the Executive Summary of the report into Infrastructure Delivery and Planning Issues in the West of England. The report was written by Roger Tym & Partners with specialist transport input from URS.
- 2 Our emphasis in this assessment is three-fold.
- 3 Firstly, we need to inform partners about the key infrastructure needed to get the West of England's Priority Key Development Sites (PKDS) developed, and the costs and funding of that infrastructure.
- 4 Secondly, we pull together evidence on growth barriers, infrastructure dependencies, available funding and development viability to understand infrastructure funding gaps and to set up a credible story about which sites can go forward, when, and how. The resulting analysis is then used to determine an alternative housing trajectory for the West of England. This allows us to investigate how close the West of England Partnership can get to delivering RSS targets for housing and employment over the plan period.
- 5 Thirdly, we look at what the public sector can do to support the delivery of the priority sites by examining how an action plan might go about influencing wider strategic, management and policy choices.
- 6 The diagram below shows how we have structured this report.

Figure 1 Report structure



Source: RTP

Our scope and approach

- 7 In this study, we are looking at the West of England Partnership area. The area comprises the four unitary authorities of Bath & North East Somerset, Bristol, North Somerset and South Gloucestershire. The focus for our study is the Priority Key Development Sites specified by the Partnership, where the units have yet to be given planning permission (“uncommitted growth”).
- 8 We have provided an assessment of requirements, costs and funding of “big ticket” primary infrastructure. We have identified this as being the categories of a) transport, b) education and c) parks, open space and leisure.
- 9 We have implicitly allowed for secondary infrastructure costs in the study. Secondary infrastructure is the infrastructure required to create accessible and serviced developable plots, such as internal distributor roads and drainage. Generic cost assumptions for this infrastructure are included in the viability analysis.
- 10 We have also assessed utilities and flood issues where a lack of utilities capacity or flood risk may represent an obstacle to growth coming forward. Where fixing these problems represents a potentially high cost to developers, we have reflected this in our viability analysis.
- 11 We are quoting capital costs in this study. In this we are following the spirit of the guidance of Circular 2005/05.
- 12 Regarding funding for infrastructure, we have looked in detail at mainstream funding for infrastructure and likely developer contributions. We start from the basic assumption that, where possible, mainstream funding should be used in the first instance to pick up the capital infrastructure requirements following a growth in population in a given area. We also assume that developer contributions are generally intended for capital expenditure, not revenue.

How to use this study

- 13 Our objective is to provide a focus for long term strategic decisions. The process is valuable as it offers a framework highlighting the decisions which will need to be made. This work will inevitably need to be refined and realigned as the process and time unfolds. There are a number of important points which must be borne in mind when using this document. In summary they are:
- Infrastructure providers reserve the right to update the information provided to ensure that it is relevant and useful.
 - The estimates of infrastructure requirements, costs and funding provided here involve a high level of spatial and temporal generalisation.
 - Authorities are at different stages in the preparation of their LDFs and as such in many cases further work is needed to identify specific infrastructure requirements.
 - This infrastructure assessment is not a policy document. Information included in the assessment does not override or amend the various agreed/adopted strategies, policies and commitments.
 - Our calculations of site value do not purport to offer a valuation of any particular piece of land or site.

- It is not possible to translate our findings here into a Community Infrastructure Levy (CIL) charge, tariff figure, planning charge or Section 106 Development Plan Document. More detailed inputs would be required at a local authority level.
- Developers and Local Planning Authorities will not be able to use this work to negotiate Section 106 agreements.
- Our analysis says nothing about whether a five year supply of housing is available. This would need to be determined separately.

Study context: what are partners’ objectives for growth and infrastructure? What is the outlook for public spending?

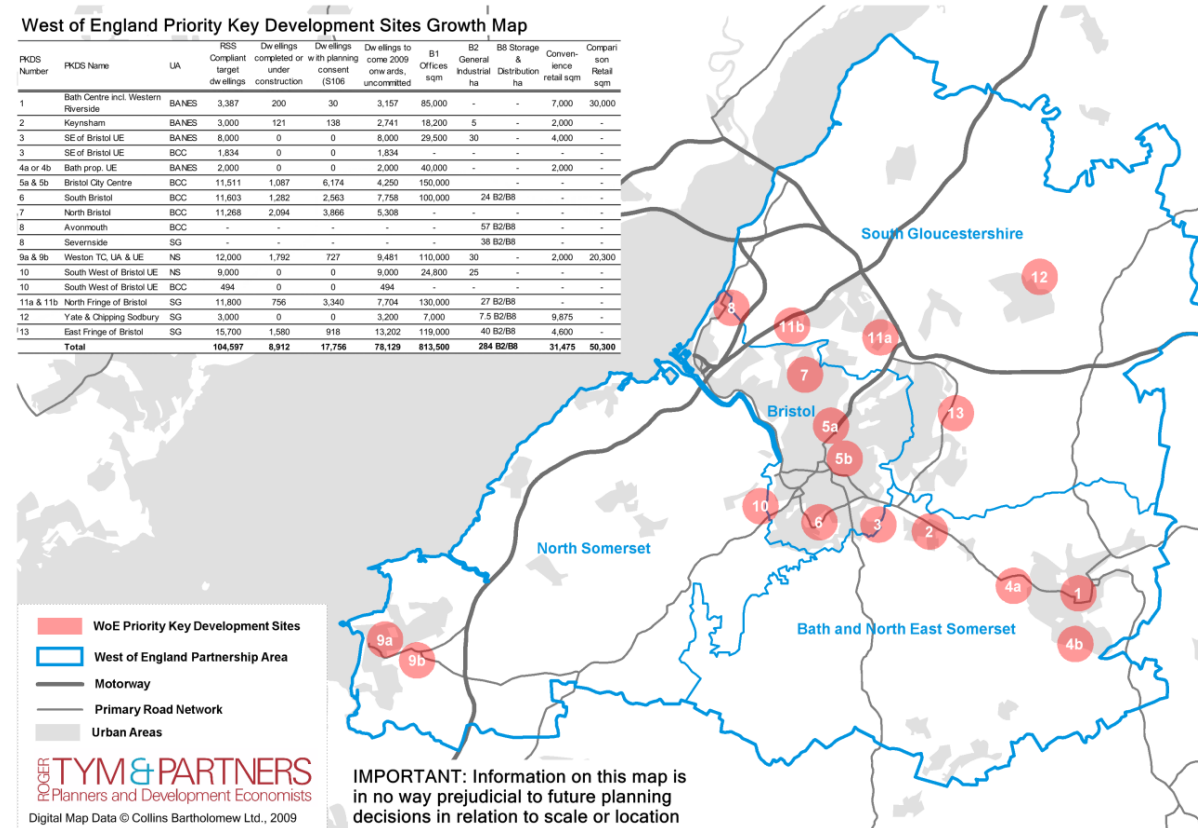
- 14 The draft Regional Spatial Strategy (RSS) sets the direction and quantum of growth that forms the basis for this infrastructure study. The broad strategy for the sub-region is as follows.
- In Bristol, a better balance between homes and jobs is proposed and emphasis placed on expanding the role of the City Centre and regenerating South Bristol. Major urban extensions are proposed to the south-west, south-east and north and north-east.
 - In Bath, expansion of the employment, service, retail and cultural roles of the city centre is supported and provision made for an urban extension to the south of the City.
 - In Weston-super-Mare, employment led regeneration is proposed with housing growth to be phased and linked directly to job growth. Revitalisation of the town centre and seafront, and an urban extension to the south east of the town are proposed.
 - In Yate and Keynsham, there are opportunities at both towns for housing and employment growth.
- 15 The Regional Economic Strategy (RES) recognises the lead role of the West of England, particularly Bristol, as a city-region of international-significance. The RES also makes the point that there is an important economic rationale to an efficient infrastructure system.
- 16 Regarding transport, national policy seeks to reduce transport and consequent demand for new infrastructure. Regional policy on transport infrastructure refines and applies the national approach.
- 17 These policy objectives should be placed in a wider economic context. The outlook for public funding is not positive. Published budget numbers show that public infrastructure funding will be cut back hard in coming years. PwC note that there is a need for a “transformational” Government efficiency drive, which has delivery implications for this study, particularly around the need for collaborative infrastructure procurement.
- ## What is the planned growth we are providing infrastructure for?
- 18 In this section we explain what level of jobs and housing growth we are providing infrastructure for.
- 19 The level of housing growth in RSS Proposed Changes is contested by local authorities in the West of England. Without prejudice to these reservations, the starting point for this study is the RSS Proposed Changes, which proposes 117,350 new dwellings from 2006-26 for the West of England Partnership area.
- 20 We focus in on a sub-set of this data. We look at future growth without planning permission (“uncommitted growth”) on the grounds that these are the sites which have outstanding

infrastructure requirements. (Sites with planning permission are deemed to have the necessary infrastructure). We also look at the Priority Key Development Sites only. These form the great majority of sites for growth in the West of England: overall the PKDS are expected to deliver housing growth of 104,597 between 2006 and 2026, forming 89% of the total Proposed Changes RSS target for the West of England.

21 The RSS also sets out plans for employment land. The West of England Partnership has undertaken a preliminary assessment of how RSS job growth and employment land targets for the West of England may be achieved, including the role that may be played by the PKDS. This work has provided us with some rough levels of employment land growth to inform our assessment of necessary infrastructure.

22 We have pulled together plans of housing and employment space growth at the PKDS as follows.

Figure 2 PKDS Planned housing and employment growth



Source: RTP/MAA2/West of England Partnership

How much developer contribution will jobs and housing growth create? How viable is housing growth?

23 Given the planned growth explored in the section above, in this section we use some high level assumptions allow us to explore the rough parameters of what developer contribution it might generate. This exercise is important because developer contribution form an important component of the funding package for infrastructure. It also allows us to examine when development is likely to

be viable. Those with a detailed interest in this study must refer to these caveats listed in the main report. Perhaps most important is that the figures are not based on, and do not constitute, “Red Book” valuations (RICS Valuation Standards 6th Edition).

24 Development in the PKDS by the private sector will only usually be undertaken where it is considered financially viable. A number of factors work to reduce viability, including high developer contribution requirements, an existing use value of a site, and the wider (currently unfavourable) economic context. Other factors which can have a significant effect on viability are building standards (such as Code for Sustainable Homes requirements), site abnormal costs and, in the case of sites which have already been acquired, the structure of any price agreement.

25 We have undertaken a high level assessment of viability. Broad development areas within each PKDS have been assigned a development category related to a) type of development area (whether urban, sub-urban, or urban extension); b) the relative value of PKDS development area; and c) the level of likely abnormal costs of PKDS development area. We have assessed the impacts of market conditions, and reviewed the best available research on the future for housing prices so as to ensure that a recovery in economic conditions is anticipated in the study. We applied policy assumptions around affordable housing proportions and mix, grant funding, density, and Code for Sustainable Homes (CSH) level.

26 Using the above assumptions, our analysis shows that in the “bottom of the market” scenario, where values are approximately 25% lower than previous peak values, all development sites are potentially unviable. It should be noted this is based on 35% affordable housing (20% in urban areas) and a requirement for Code for Sustainable Homes Level 5. This lack of viability is particularly pronounced in lower value areas, where there is a significant viability gap.

27 In the “full recovery” scenario, some development categories have relatively high levels of surplus worth that could be secured to fund infrastructure requirements where justifiable. However, some urban developments appear to remain unviable.

28 We then assessed the impact of changes to key variables on viability and potential developer contributions. We modelled the effects of reducing affordable housing requirements, changing housing mix, increasing grant funding, and lowering sustainable building requirements. We also looked at the effects of using lower assumptions on land costs. Using these changed assumptions, some development categories become viable even in depressed market conditions, and become significantly more attractive to developers in the “recovery” scenario.

29 We also looked at the contribution of employment development to developer contributions. We assume that non-retail employment makes no developer contribution. We do not wish to give any impression that we are ‘taxing’ job creation. If we did, employment may go elsewhere. We assume that retail development generates developer contributions for use against wider social and economic impacts. The exact sum of developer contribution can only be ascertained during the actual detailed planning negotiations and will vary considerably from scheme to scheme. We have assumed for the purposes of this assessment that convenience retail (i.e. foodstores) generates a developer contribution of £2 million, whereas comparison retail (such as retail warehousing and in-town retail development) produces a contribution of £1 million. We would recommend that this is assessed in more detail.

Transport: What key infrastructure is required? What are its costs and funding? Do barriers to growth exist?

30 In this section we examine the transport infrastructure required to support planned jobs and housing growth. We then look at the cost of that infrastructure, and how that infrastructure might be funded.

31 We begin by examining the context for transport infrastructure in the West of England. The sub-region is highly dependent on car transport, and policy is attempting to erode this “high car dependence” in favour of other modes. It is clear from the Greater Bristol Strategic Transport Study (GBSTS) that there are existing deficiencies in the transport network, even before RSS growth is accounted for.

32 While our general approach has been to concentrate on the transport implications associated with growth only, historic deficits in transport should not be entirely “tuned out”, as they can have a bearing on scheme requirements, deliverability, timing and priorities. Generally the cost to remedy matters of historic transport deficit cannot be justified from developer contributions, but developers may legitimately be required to make contributions towards schemes designed to address historic deficit in proportion to the impact that their schemes will have.

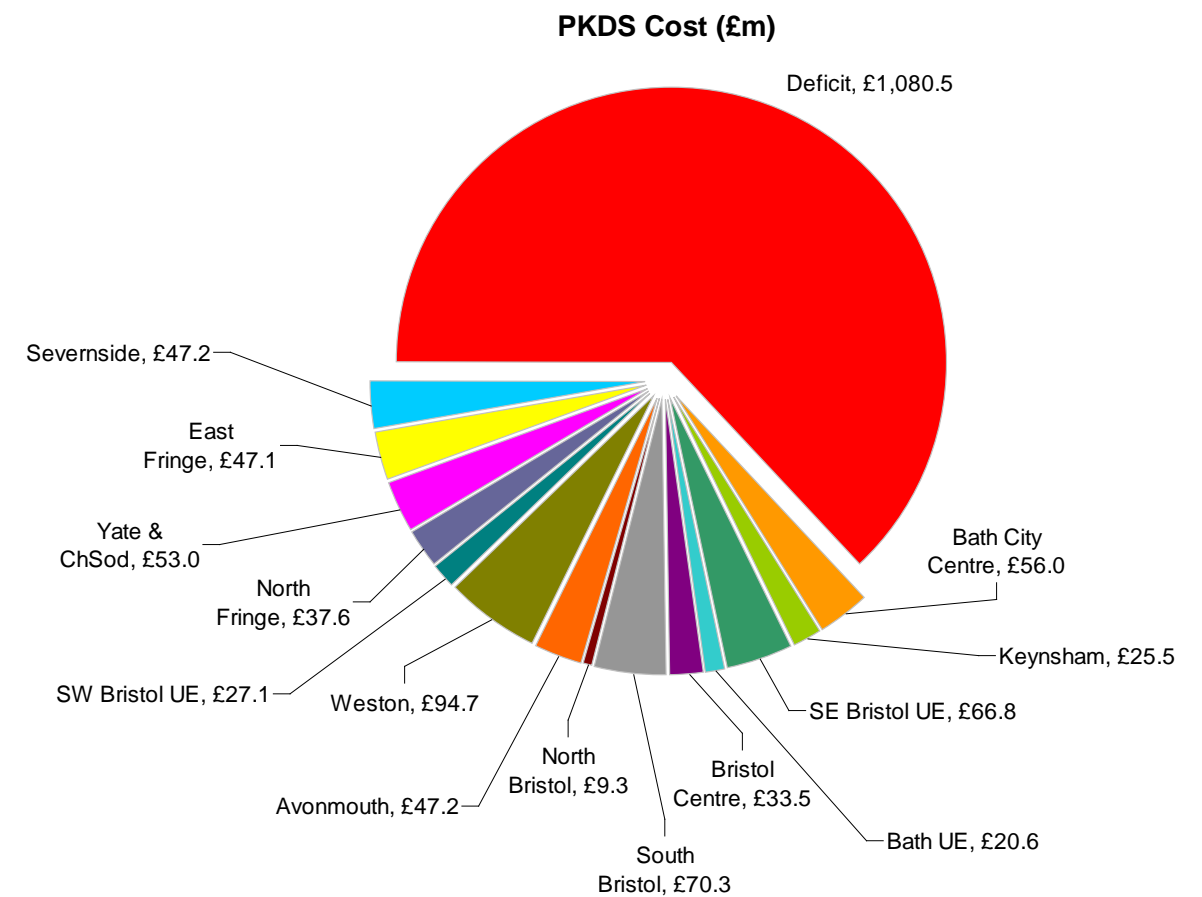
*What are the infrastructure requirements resulting from housing and jobs growth?
What are the costs?*

33 Transport infrastructure investments related to growth, and the dates by which they can be implemented, are too complex to list here. Please refer to the main report (see table entitled “Transport infrastructure requirements: detailed findings”, which is itself summarised in the main traffic lights tables in section 11).

34 The cost of all schemes identified in the ICT comes to £1.601billion (including £127.1m for schemes that do not map to PKDS), with the additional cost of the schemes suggested by URS at £116m. This delivers a total transport infrastructure cost of £1.716b.

35 We then worked to strip out historic deficit costs to isolate a transport infrastructure cost generated by the PKDS growth itself. We categorised schemes according to the extent they service existing supply problems. Our analysis showed that the greatest cost is attributable to historic deficit (£1.081b). Thus the costs of transport infrastructure attributable to growth in the PKDS is estimated at £635m.

Figure 3 Transport costs by PKDS (showing historic deficit and costs allocated to PKDS uncommitted growth)



Source: URS

How can new infrastructure be funded?

36 A number of funding streams are available. Some funding has already been secured. However, there is a funding shortfall after taking secured funding into account. Committed total funding (for projects that address both PKDS growth and historic deficit) amounts to £763m. The largest source for funding is the RFA. There is a small amount of developer funding in the total committed funding (£28m) that has already been agreed, which if removed leaves approximately £735m. This is £346m below the £1.081b identified as the total cost of historic deficit.

37 The total funding shortfall is £953.3m, 56% of the total cost of transport infrastructure and 125% of available funding.

38 Some packages are well funded. Conversely, there is clearly a large number of schemes that are unfunded and in some cases it is not yet practicable to identify costs given the current status of development in the Local Development Framework or design process. It is reasonable to anticipate that some funding will come through from sources such as RFA bids and developers (although this study does not seek to allocate currently uncommitted developer funding). This will be for the period post-2019. It is unreasonable to imagine that the full funding shortfall will be met, particularly in the

light of evidence which shows that there will be a significant public funding shortage. Where a scheme has no funding it is unreasonable to assume that it will go ahead.

Issues

- 39 A number of key transport issues should also be noted.
- Judgements with respect to phasing of development have been constrained by gaps in the evidence base provided by the existing transport modelling work.
 - There will be significant negative effects if planned growth proceeds without proper transport infrastructure.
 - Containment strategies are unlikely to be sufficient to mitigate the full impact of growth.
 - We have identified reservations from the Highways Agency with regard to Avonmouth, Severnside and Weston PKDS.
 - There is significant reliance on BRT and the Greater Bristol Metro Project. All of the PKDS are enabled by at least one public transport scheme, in many cases there are a number of BRT schemes that a PKDS is considered to be required and the GBMP is relevant to all sites.
 - Decisions need to be made about the South Bristol Link Phases 1 & 2. The scheme is considered to be necessary for both the South West Bristol Urban Extension and South Bristol, and may also provide some benefits to the South East Bristol Urban Extension. But at present it appears that although there is agreement that the scheme is required its concept is yet to be defined.
 - Some packages are not sufficiently defined, including the East Fringe Package (although fully funded, a transport study for the PKDS at this location is required); the Yate Package; the Bristol Bath Corridor Transport Package; and the South East Bristol Transport Package.
 - The Conservative Party have suggested that Regional Funding Allocations (RFAs) would be abolished, along with some levels of regional governance, should they come to power at the next general election that must take place by June 2010. What replacement funding will be available, if any, is currently unclear.

Education: What key infrastructure is required? What are its costs and funding? Do barriers to growth exist?

- 40 This section looks at the requirements, costs and funding of the necessary education infrastructure to cope with uncommitted growth in PKDS to 2026. We focus on primary, secondary, post 16, and special education needs. Children's Services are in a rapidly changing environment. This work can only provide a snapshot of the current situation, and will require careful ongoing review.
- 41 All four authorities have surplus capacity. Most are around the Audit Commission guidance level of 10% surplus. North Somerset has the least capacity and is in some places at capacity. Bristol currently has the highest levels of surplus capacity of the four authorities. There are various plans to reduce surplus capacities, particularly through restructuring and modernising current infrastructure. Much of this is dependent upon implementing approved Primary Strategies for Change or getting approval for Building Schools for Future (BSF) programmes.
- 42 Service providers state that there will be no spare capacity to meet the requirements of new housing. The key point from the service providers is that the surpluses currently available will be

absorbed by past birth rates, re-organisation of schools and stemming of net out migration. They states that there will not be capacity to meet the requirements of new housing. They state that more detailed work will be required to resolve how the competing pressures of housing growth, demographic changes, and stated policy interact.

- 43 However, we caution that developers will challenge any requirement to contribute to education infrastructure where surpluses exist. Therefore, we suggest that unless it is absolutely clear when and where any surplus capacity will be used (for purposes other than growth) we suggest that it should be used to support growth, thus reducing the overall infrastructure cost over time.

What are the infrastructure requirements resulting from housing and jobs growth? What are the costs?

- 44 We have worked with Local Education Authorities to understand the complex set of education infrastructure requirements and associated costs resulting from housing growth at each PKDS. We have presented this information in tabular form in the main report.
- 45 The total cost of education infrastructure required to cope with growth at the PKDS is calculated to be £624.3 million.

How can new infrastructure be funded?

- 46 We list various sources of mainstream funding. However, we are advised by LEAs that this funding is not available to cope with growth. LEAs would be looking for developer contributions to provide capital funding. Because we are not allocating developer contributions, this indicates that there is a mainstream funding gap of £624.3 million.

Are there any growth barriers?

- 47 We find no insurmountable growth barriers. Typically, education capacity exists in the early part of the plan period (and so the bar chart is coloured green), and then capacity fills (and so turns amber). We have classified these instances as amber rather than red because the provision of education infrastructure for growth depends in large measure on policy choices on the extent to which a) available developer contributions are allocated to education, and b) use is made of existing education funding streams.
- 48 We reiterate the point made above, though, that developers are likely to challenge any requirements to contribute to education infrastructure where surpluses exist.

Issues

- 49 Changes to the shape of future provision is likely to be substantially different to the system that has operated to date (eg a move to merge secondary and post 16 provision, and the creation of academies). The infrastructure funding model we have created in this work will need to be regularly reviewed to reflect such changes.
- 50 Cross border education patterns may change. Many parents in Bristol City in particular currently choose to send their children to adjoining authorities. A detailed analysis of local situations will be necessary to assess existing capacities at the time new development is proposed and this could again affect costs and funding.

51 The co-location of youth services and other services in multi-use centres would be an efficient way of responding to service demands.

Open space, parks, sport and leisure: What key infrastructure is required? what are its costs and funding? Do barriers to growth exist?

52 In line with the locally specific approach advocated by Government in PPG17, different authorities have taken a different approach to this issue. There is nothing wrong with these approaches, but these variations mean that the different standards used are difficult to compare across the Partnership area. Getting a consistent picture of stated green space requirements around the sub-region in order to identify the infrastructure requirements and costs of growth at a Partnership level is therefore a complex business. We have solved this problem by reviewing local space standards, and set these against a broader review of standards elsewhere. We have uniformly applied these requirements to all PKDS.

53 Having picked reasonable space standards, we have looked at the open space, parks and leisure requirements that these sites might have, and costed them using a set of stated comparators and assumptions.

What is the funding gap for this infrastructure?

54 There is no mainstream funding to support parks, open and play space, playing fields and allotment provision for new growth. We assume that 20% of the capital costs of leisure centre provision will be met from mainstream funding. There are also non-local authority funds available for these uses, although these funding pots are difficult to use as a platform for strategic investment.

55 Our spreadsheet model suggests that there will be a significant funding deficit of £162m for open space, leisure and sports provision to support growth. Some developer contributions will be available to plug this gap, the this study avoids allocating developer contributions funds to particular themes given that these resource allocation decisions are essentially political in nature.

There are no growth barriers in this category

56 We have identified the extent to which a lack of parks and open space infrastructure will form a technical obstruction of the delivery of planned housing. We find no growth barriers.

Summary: the costs and funding of infrastructure for planned growth at the PKDS

57 In this part of the report, we pull together the costs and funding of transport, open space and education infrastructure to support planned growth at the PKDS from 2009-26.

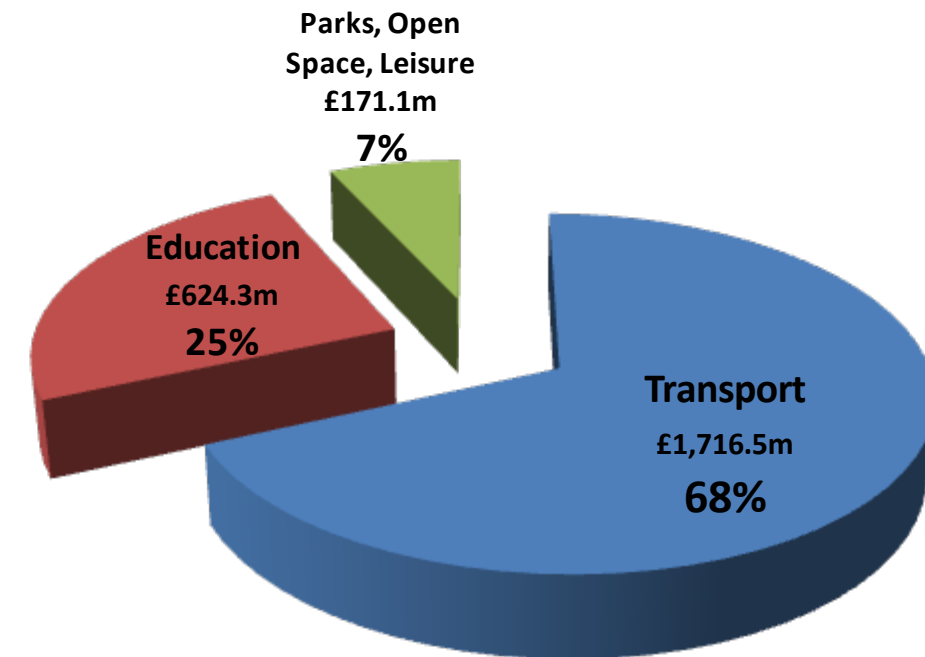
58 Our work suggests that there is a £1.2bn funding gap to 2026, across the West of England. The headline figures on costs, mainstream funding and developer contributions are as follows.

Overall Infrastructure costs of	-£2,512m
Mainstream funding of	+£ 772m
Developer contribution funding of	+£ 509m
Leaves a funding gap of	-£1,231m

Analysing estimated key infrastructure costs

59 Regarding costs, the chart below shows that the majority of costs are associated with transport.

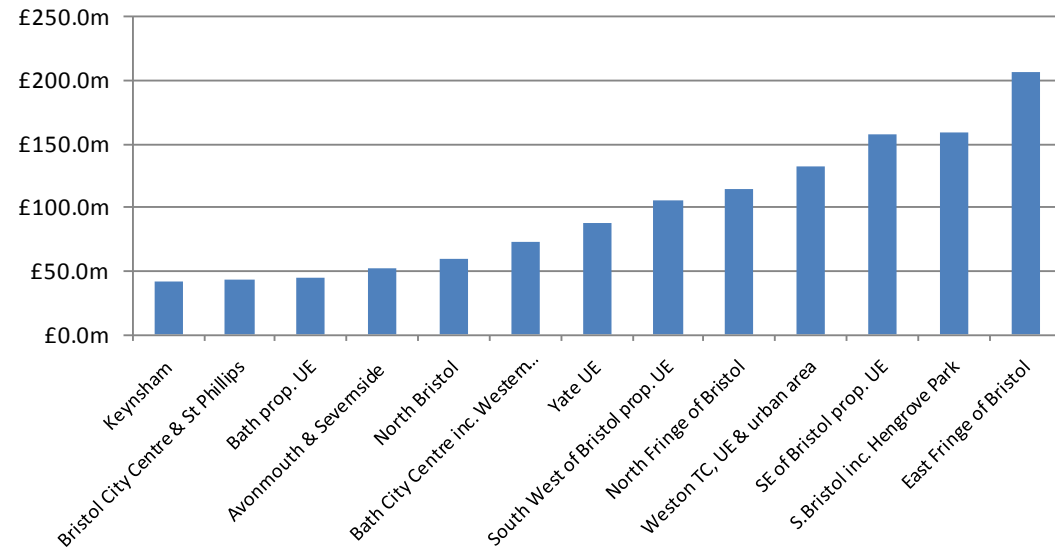
Figure 4 Infrastructure costs by theme (percent; including historic deficit on transport)



60 In the chart below, we show the capital costs against the funding identified. The chart indicates that mainstream funding will only make a limited contribution to the costs of infrastructure for growth.

61 The costs of infrastructure required to support growth at different PKDS vary significantly. The chart below shows that the estimated growth infrastructure cost (excluding historic deficit transport costs) by PKDS varies significantly, from less than £50m in Keynsham, to approximately £200m at the East Fringe of Bristol.

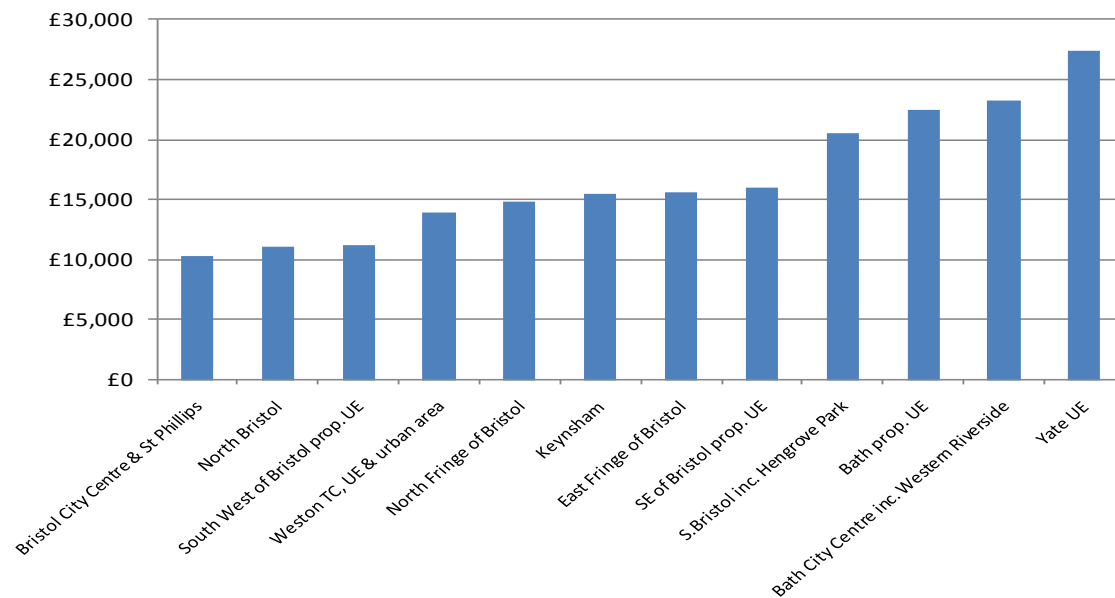
Figure 5 - Estimated growth infrastructure cost by PKDS (excluding historic deficit transport costs)



Source: RTP

- i. A different picture emerges when growth infrastructure costs by PKDS are analysed by cost per dwelling. The chart below summarises the high level apportionment of growth infrastructure costs (excluding historic deficit transport costs) on a per dwelling basis.

Figure 6 - Estimated growth infrastructure cost per dwelling by PKDS (excluding historic deficit transport costs)



Source: RTP

Analysing estimated mainstream funding for key infrastructure

- ii. We have assessed the potential availability of mainstream public funding to pay for the infrastructure requirements resulting from the assumed uncommitted growth in the West of England PKDS.

Figure 7 - Estimated mainstream funding (i.e. excluding developer contributions) and funding gap

	Estimated Cost	Estimated Mainstream Funding	Mainstream Funding Gap	% Costs Covered by Mainstream Funding
Transport	-£1716.5m	£763.1m	-£953.3m	44%
Education	-£624.3m	£0.0m	-£624.3m	0%
Parks, open space & public realm, leisure	-£171.1m	£8.7m	-£162.4m	5%
	-£2511.8m	£771.8m	-£1740.0m	31%

Source: RTP

- 62 As set out in the education chapter, we have been informed by the UAs that there should be no assumption of mainstream funding for education. Consequently, the mainstream funding gap for education is roughly similar in scale as for transport, where approximately half the cost is estimated to come from mainstream sources.
- 63 Although the estimated cost of parks, open space and leisure is significantly lower than transport and education, the low proportion of estimated mainstream funding means the mainstream funding gap is still over £150m.

Analysing estimated developer contributions to infrastructure

- i. Developer contributions can be used to “plug” some of the funding gap we have uncovered. Our spreadsheet model shows a total estimated indicative developer contribution level from the uncommitted growth in the West of England PKDS of approximately £500m from 2009-26.
- 64 Some PKDS have the ability to provide higher developer contributions than others, from £0 per unit in South Bristol to over £10,000 per unit in the East Fringe of Bristol and Bath proposed Urban Extension. It should be noted these figures are highly sensitive to the development assumptions, and the assumed category for the development areas within the PKDS.
- i. We tested the impact of varying assumptions on land prices, affordable housing, sustainability requirements and HCA grant levels. These changed assumptions can have a big impact on developer contribution available. More details are provided in the main report.
- ii. Although our developer contribution analysis is at a high level, it demonstrates how the planning system’s requirements affect the level of contributions available for infrastructure funding. Equally, it shows the importance of ensuring that landowners and developers do not over-inflate land costs. Clear and consistent signals on infrastructure requirements will help ensure that land prices remain realistic.

Are there “growth barriers” obstructing the delivery of the PKDS?

- 65 Having identified the costs and funding of key infrastructure to cope with planned RSS growth, in this section we identify “growth barriers” to the real world implementation of RSS growth. Growth barriers may arise when

- The absence of certain types of infrastructure might mean that the housing and jobs growth at a PKDS might not be deliverable until later than anticipated, if at all. Examples might include a shortage of clean water or sewage capacity.
- The provision of certain infrastructure may be so costly that a site becomes economically unviable to develop. It is the case that many “growth barriers” can be overcome, given time and the necessary level of investment. Some elements of infrastructure provision costs will be borne by the private sector utilities companies involved, but some costs may be passed on to developers. The level of investment involved in overcoming the issue may be too high given the expected final value of the site.

66 We take account of infrastructure costs in our spreadsheet model by ascribing a “low”, “medium” and “high” abnormal cost to developments. We have then fed these findings into our high level viability calculations. Although we have reported cost estimates in our narrative, it is important to note that we have not entered specific abnormal cost estimates into our infrastructure spreadsheet model, because at this stage it is neither necessary nor desirable to do this.

Gas

- 67 There are two gas pipeline systems: national high pressure networks (National Grid) and local low pressure networks (Wales and West Utilities). Network reinforcement costs are met by the national and local distribution companies. The cost of connecting a new development to the local network is borne by the developer. The costs of connections to units within a development site are also the responsibility of a developer.
- 68 Both the national and local distribution network has sufficient capacity to cope with growth, although ongoing work is required.
- 69 There are no supply or viability growth barriers resulting from gas infrastructure requirements at the PKDS.

Electricity

- 70 The national network in the West of England is operated by the National Grid. National Grid advises that the growth proposed for the west of England will not have a significant effect on their infrastructure. Existing capacity is sufficient to deal with projected demand.
- 71 There are two local distribution companies in the West of England - Western Power Distribution and Central Networks. Both have identified a set of network reinforcements that would be required to support the growth planned in the PKDS.
- 72 The specific capacity issues have been summarised in the main report. None are fundamental in themselves, although issues on the Northern Fringe are complex to resolve. Some costs will be borne by Western Power Distribution and Central Networks, but most of this reinforcement will be paid for by the developers. In exceptional circumstances third party funding - eg SWRDA - can be used to increase electricity capacity.
- 73 There may be a number of developments all being supplied by the same substations. There are potentially some “free rider” issues for early developers. Later development will then have to pay for reinforcement. Some power lines will need to be moved. These issues mean that there is a

need for liaison and forward planning, and a need for an equitable spreading of costs across site developers.

Water Supply

- 74 There is currently no 'national grid' in the water industry and thus water has to be collected, stored and distributed within the regions. In the West of England, water supply is provided by Bristol Water and Wessex Water.
- 75 Future demand has been anticipated by the industries. Overall, it is clear that there is current capacity and that while future growth will introduce some strain, investments are planned that will improve supply and mitigate increases in demand. There are likely to be some local reinforcements to cope with growth, but these will be developed as detailed plans emerge.
- 76 Individual site connection costs are picked up by developers through the development process, whilst strategic projects are generally paid for through water companies' general water charges income. Where off-site works have been identified to service specific development sites - such as new link/primary leading mains - developers will be expected to make a contribution to an amount determined at the detail design stage under the usual requisitioning/adoption process.
- 77 In summary, there are no obvious provision or viability growth barriers resulting from water infrastructure requirements at the PKDS. There are some issues on the South West of Bristol Urban Extension, where some strengthening is required.
- 78 In common with other utilities, there is a need for liaison and forward planning, and a way of spreading costs equitably across site developers. There are no specific timing impacts that need to be taken account of.

Sewerage

- 79 Wessex Water is the incumbent sewerage company for the whole of the West of England area. Developers pay for foul sewerage connections, with an offset to take account of future income to the sewerage company.
- 80 Sewage treatment works (STWs) are provided by sewerage companies through their 5-year investment programmes agreed with OFWAT. These are fixed, not rolling programmes: the investment programme for the period 2010-2015 has been submitted by Wessex Water to OFWAT.
- 81 There will be a set of investments required to facilitate growth. In only a few of the PKDS is there enough capacity to take the required development forward without any substantial investment. These are:
- Bath City Centre and Western Riverside
 - Bristol City Centre and St Philips
 - North Bristol

- 82 Because of long lead times for provision of infrastructure, it is probable that:
- Some PKDS will only be able to take a limited amount of development forward now and the remainder after 2015 at the earliest - Keynsham, SW of Bristol urban extension, Yate, and the southern Bath urban extension.
 - Some PKDS will not be able to take any development forward until 2015 at the earliest - SE of Bristol urban extension, southern part of the North Fringe, East Fringe.
- 83 The timing and location of development will be important in determining how Wessex Water can respond - for example if all the Bristol, South Gloucestershire and Bath and North East Somerset development comes forward together, then Wessex Water should be able to expedite the downstream investment.
- 84 Where the discharges from proposed developments require enhancements to STWs and the networks serving them, it is essential that these are carried out and completed before the developments are occupied. Close liaison between LPAs and the water companies is essential to ensure that the latter are aware of proposed development programmes. Where necessary, the company can install temporary treatment in advance of permanent capacity where there is a long lead time and there is some uncertainty over whether development will materialise at the levels envisaged in local authority's development plans.
- 85 In view of the current economic climate and uncertainty over location and timing of development, Wessex Water is awaiting the outcome of the Regional Spatial Strategy and Local Development Frameworks before formulating its detailed investment programme.

Telecommunications

- 86 Telecoms provision is dealt with privately. There are no infrastructure requirements on the public sector.
- 87 New landline and broadband capacity will be built and privately funded in line with development. There will be no significant effect on viability, and the Universal Service Broadband Commitment is not anticipated to have a major impact on new growth.
- 88 Investment will not take place until BT Openreach is confident of growth actually materialising.

Flood Protection

- 89 The developer has the main financial responsibility for flood defence on new sites. The EA is a statutory consultee for planning purposes, and has the power to halt development if there is a major risk of flooding from, or to, any proposed new development.
- 90 There are a number of flood issues around the West of England. These are summarised in the growth barriers table in the main report. Avonmouth and Severnside have the highest flood risk. In addition, there are flood issues for many of the Bath City Centre and Western Riverside sites, and with Bristol City Centre and St Philips. The South West of Bristol Urban Extension will require a new flood scheme, which will add to the costs of development.

- 91 Development on other PKDS will require sustainable urban draining systems (SUDS), which manage the flow of runoff. We make an allowance for typical SUDS costs on all sites, but some sites may have flood costs that go beyond typical levels. These may affect viability negatively.
- 92 The Environment Agency receives DEFRA funding. The focus for the capital expenditure is on projects to protect existing development, rather than to facilitate new growth.
- 93 A number of issues have emerged. These are cross border in nature, including the relationship between development on the South Gloucestershire's Northern Fringe, East Fringe and development in Bristol City Centre. There is also a relationship between the South Gloucestershire East Fringe and development in Bath and North East Somerset Keynsham. There is a need for the North Somerset SW of Bristol urban extension to have a flood scheme within Bristol City Area. The risk and potential flood solutions in Avonmouth/Severnside are cross-border in nature.
- 94 With the exception of the new flood scheme for the SW of Bristol urban extension, these cross border issues are opportunities to provide strategic solutions to flood risks rather than growth barriers.

The "traffic lights": assessing growth barriers at the PKDS

- 95 In this stage we have taken our findings from the sections above and (where relevant) made explicit what this means to likely progress on each site.
- 96 The traffic lights tables can be found in the main report. We have not reprinted them here.

What are the implications of the barriers for housing development trajectories?

- 97 The traffic light tables provided are useful in exploring how "real world" barriers will affect the actual delivery of planned housing growth (as defined by RSS Proposed Changes) to 2026. Employment growth is outside our scope in this section.
- 98 We are focusing on development deliverability (showing which developments could happen) and leave others to make judgements about development desirability (about which developments should happen). What should be allowed to happen is essentially a political choice, and we believe that any good planning system will want to take a rounded view on matters such as social inclusion, sustainability, place shaping and so on. We have only left these considerations out of this report because we have no political mandate.
- 99 We do not assume any policy interventions will take place in future. If policy interventions, such as HCA funding, are already happening now, we have reflected the impacts. (Viability issues can be solved by the use of, say, HCA funding; utilities problems can be overcome by investment). However, we do not assume that specific funding or management action will be put in place: this would be unwise, as we do not know what actions will be taken to react to this report.
- 100 In order to understand the impacts of growth barriers on housing trajectories, we have to make assumptions about build rates. These are explained in the main body of the report.

101 Investment thresholds show where the “tipping point” for new infrastructure is. For example, it might be the case that 500 houses could be built in a certain location but no more, due to the lack of, say, sewage capacity. Where we have that information, we have used it in the traffic lights tables. However, in many instances, providers do not have the necessary level of detail that would enable them to make the judgements required.

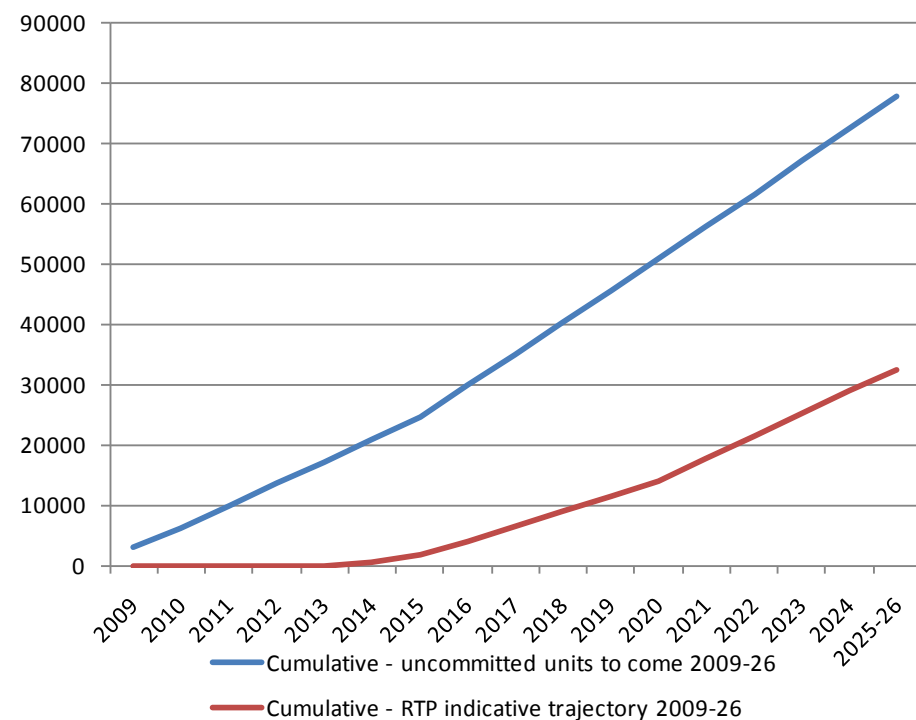
The barriers to development have important implications for trajectories

102 Our analysis suggests that build start dates are pushed until later in the plan period than previously anticipated, often due to viability problems and transport barriers. This has onward ramifications for delivery. Delivery is significantly lower than anticipated to 2026 due to a) later starts (caused by the barriers above); and b) our use of what we consider to be more realistic build out rates.

103 Uncommitted growth from 2009-26 is the growth we have looked at specifically in this study. Our analysis of barriers to growth suggests that less than half of uncommitted planned growth will be delivered from 2009-26.

104 The chart below looks at cumulative delivery. Our analysis suggests that there will be a very slow start compared to that originally anticipated, with delivery to these relatively demanding planning requirements (of Code for Sustainable Homes Level 5, 35%/20% affordable housing) not beginning until 2014. Clearly, if these requirements were to be relaxed, or planning authorities were willing to tolerate greater levels of congestion, then more housing could come forward sooner.

Figure 8 - Cumulative delivery of uncommitted growth 2009-26 (West of England)



Source: RTP

105 These difficulties will affect the sub-region’s ability to hit the targets set for the PKDS by the RSS over the full 2006-26 planning period. Combining UA’s own estimates of build out of sites already with planning permission with our estimates of build out at PKDS suggests that around half of the RSS growth expected at PKDS will be delivered.

Ways of overcoming growth barriers

106 In the earlier parts of this report, we have shown that there is a very significant infrastructure funding gap, and that a number of “real world” obstacles are in the way of anticipated build-out schedule.

Responding to the challenge with an action plan

107 We believe that because the assessment looks at the interlocking issues of viability, planning obligations, emerging changes in CSH, and market conditions alongside strategic plans it is both unusual and valuable. As a result, it generates some far reaching recommendations that go beyond infrastructure itself. But the recommendations might be best be seen knitted together, into an overall action plan. The action plan would

- sort the wheat from the chaff - by outlining each authority’s priorities, and the right sequence for investment
- help the political decision making process by clarifying decisions that need to be taken, and what the ramifications of choices are
- focus around how problems will be resolved - in a very direct and head-on way.

108 The first step would be to use the findings from this report to prioritise sites and policy interventions. The objective of this step would be to decide where to concentrate planning effort and the available funding. The West of England needs to have an integrated view of which sites are both deliverable *and* desirable, and so evolve a rough order of priority for attention over different timescales.

109 The second step would be to identify and fix problems on priority key sites. The objective of this work would be getting delivery moving on the priority sites. This work would attempt to move to a situation where planners are active co-deliverers of positive change. That means a more proactive approach, working alongside developers to ask questions like: how do we fix the barriers to positive change? What do we do next? When? How? What’s the right public sector role?

110 The action plan might have a number of strategy, policy and management components. We discuss those here.

Strategic responses in the action plan

111 There will be an important role for sequencing and prioritisation. We question whether the UAs and the sub-region should be attempting to deal with all sites at the same time, or whether it should adopt a more focused approach on a smaller number of sites. Part of the prioritisation process would look at determining which sites are most “infrastructure cost efficient”. The benefits of the relative transport investments also needs to be considered in order to spend money for maximum impact, and partners need to understand, and then focus effort on, the issues on the critical path. (Problems on the critical path are related to transport and viability in the main, with a small number of site start delays created by the need for detailed planning of large sites). To improve build out

rates, partners might also consider sequencing a careful mix of greenfield and brownfield sites into strategy. There are the advantages and disadvantages of this approach, and ultimately, these choices are political.

112 Transport forms such a significant component of the infrastructure requirement for the PKDS that it needs special consideration when looking at sequencing and prioritising sites. There needs to be a mechanism that can review, and quickly reallocate, transport funding if the development that the transport scheme serves is not coming forward.

113 If careful prioritisation and sequencing work took place, it would be possible to put together a short, medium and long term programme. It would then be possible to

- Focus resources on short-term issues
- Actively plan to resolve medium-term issues
- Leave long-term issues where it is clear that fundamental changes in funding regimes or market conditions are necessary before these schemes can be viable.

114 We have pulled together maps of possible package of sites to be addressed in the short, medium and long term. Please refer to the main report for these maps. This work can be used as a starting point for a sequencing process, but it is only that - we caution that a more developed approach including policy and sustainability considerations is needed.

115 There also appear to be a number of gaps in strategy which could be usefully filled. Policy linkages between housing development and employment take-up could be reviewed, to avoid any unintended consequences. Publicly owned sites could be specifically marketed to retirement and student accommodation sectors, which remain active. It is clear that decisions are needed quickly on the South Bristol Link, as this is holding back development across South Bristol. Hengrove is potentially a medium-term win, but lacks a strategy, and North Bristol Fringe could benefit from a more formal "cross-border" approach. Equally, there is a need for a strategic approach to Avonmouth and Severnside. Bristol City could usefully renew its central area strategy in order to provide a framework for implementation. Clearly, any refreshed strategy would need to reflect carefully on the medium and long term impacts of the credit crunch.

Policy responses in the action plan

116 Regarding policy responses in the action plan, the Greenhithe decision has potentially far-reaching consequences for developer contributions strategies. Authorities will need to develop a strong strategic rationale for requiring developer contributions and work will be needed to evidence future demands. Expert valuer advice is likely to be needed to inform any future renegotiations of developer contributions.

117 We would recommend influencing public sector masterplan content and urban design to ensure that it is development-friendly. Masterplans are often drawn up with provisions that are sub-optimal from the developers' point of view. A degree of market realism would have a considerable impact on the viability of final development.

118 We should perhaps not underestimate the extent to which the recession is going to reduce housebuilders capacity for creative thinking. Local authorities could research best practice in this respect and use it to encourage developers to look at high-density housing schemes rather than

either medium density schemes on a standard basis or for apartment schemes. Again, this would have a positive impact on viability.

119 Local Authorities and/or HCA may wish to consider Compulsory Purchase Orders (CPO) for some sites. This is a measure of last resort, but if landowners are unwilling to sell at a realistic prices, the prospect of a CPO is often the only basis upon which reasonable terms can be achieved.

Management responses in the action plan

120 Regarding management responses, a number of recommendations present themselves.

121 A number of recommendations for de-risking sites have emerged through RFA2. These are sensible. However, we would point out that Regional Infrastructure Fund is unlikely to be a "magic bullet". The main source of RIF funds is likely to be developer contributions, but as we have seen, these contributions are likely to be significantly reduced in coming years.

122 Complex sites such as South Bristol and North Bristol may need new management arrangements. These arrangements may bring opportunities for Local Delivery Vehicles and JESSICA funding where eligible. However, setting up and running these models can be legally complex and absorb great amounts of senior management time. We think - although it should be noted that this is not a worked-out position - that a simpler solution might be a council-led scheme using prudential borrowing powers to fund a rolling programme using a management contractor rather than housebuilder. This might appeal to some of the hybrid companies such as Kier or Galliford Try. Tax Increment Financing and Accelerated Development Zones could also be investigated.

123 There may be a role for infrastructure co-ordination groups to be set up at LA level. We are aware that some of these links already exist. Their key tasks might include

- Finding innovative funding packages (involving bending mainstream funding into growth areas, public/private partnerships, and revenue raising schemes) which will all be very important if infrastructure is to be funded.
- Contingency planning. Over the next few years, there is an obvious risk that hoped for public spending (on, for example, transport schemes) will not actually materialise, and partners need to be able to respond to that.
- Thinking carefully about the procurement and use of public facilities. There appears to be some potential for both quality enhancements and cost efficiencies in the provision of multi-user "community hub" buildings.
- Market scanning. Some developers will be more able than others to bring sites forward, and contribute to infrastructure. It will be useful to know which.

The way forward to a Community Infrastructure Levy

124 The Government explicitly requires progress be made towards Community Infrastructure Levy (CIL).

125 However, even after primary legislation is published, we expect that there will be a great number of practical issues to iron out. It is our guess that the benefits of being first with a CIL would be outweighed by the advantages that might be gained for the West of England by a "wait and see" policy.

- 126 There are likely to be various difficulties in setting a CIL tariff, implementing the CIL, spending the money and administering the CIL which we explore in greater detail in the body of the report.
- 127 However, we would not suggest that the Partnership simply ignore the CIL issue over the medium term. A key benefit of CIL is that it can more easily fund sub-regional infrastructure - that is, larger pieces of infrastructure typically benefiting more than one local authority area. The Government proposes that local authorities should have the freedom to work together to pool contributions from CIL within the context of delivering their local development plans.
- 128 For this benefit to be realised, the authorities in the West of England Partnership need to agree in principle that working together on a joint charging schedule is desirable. There must be a collective understanding that issues are collective in some way, and could be solved by joint action.
- 129 If appetite exists, then preparatory work could begin to define the issues covered by CIL, and the area which it could cover.
- 130 This work would be worth doing even if a CIL is not pursued by the West of England. Even if stakeholders do choose to rule a CIL out at this moment, there are still potential improvements to infrastructure service planning, delivery and developer contributions policies that could be made. These may also indirectly help prepare the Partnership for a CIL in the future, with potentially new planning approaches or policies that reflect some elements of a CIL. This could include:
- Improvement of service planning/delivery. The infrastructure assessment and funding model could be used as a base and catalyst for improving service provider liaison and agreement of priorities for s106 investment.
 - Concentration on, and resolution of, particular infrastructure category issues. CILs can cover a number of infrastructure categories. However, the CIL approach seems particularly relevant to certain categories of infrastructure (such as transport), and it may be better to concentrate on these, at least in the short term.
 - Moves towards policy alignment. Developer contributions policies, and prioritisation of infrastructure, differ between the local authorities in the West of England area. Opportunities for authorities to work more closely together on planning and developer contributions policy would not only help tackle some of the shared growth issues in the West of England area, but also form a stronger base through policy alignment for implementing a CIL in the future.
- 131 Whilst preparatory work can begin now, the Government says that primary legislation will be in place by April 2010. Detailed work should wait until after this date.