



Management of S106 contributions

East Devon District Council

—
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Section one: Introduction

This document summarises the findings and conclusions arising from our work over in relation to a formal objection received from a local elector.

Scope of this report

This report summarises the key findings and conclusions arising from our work in response to a formal objection received from a local elector in relation to East Devon District Council's 2015/16 financial statements.

Background

The Local Audit & Accountability Act 2014 (the Act) affords registered electors in a local authority's area certain rights relating to the inspection of its accounts and the ability to ask questions of the council's appointed auditor. Under section 27 of the Act, electors can also make a formal objection to a council's accounts.

Such an objection was received by KPMG in August 2016. Through this objection the elector raised concerns about the Council's arrangements for recording, monitoring and seeking payment of developer contributions due to the Council through agreements under s106 of the Town & Country Planning Act 1990, and the accounting for the sums due. In particular, it was asserted that:

- whilst the Council does have a record of how many s106 agreements it has entered into with developers, there is no systematic method in place for the collection and aggregation of amounts due from individual agreements;
- monies due in relation to s106 agreements are not systematically identified and communicated to the Council's Finance department;
- amounts due are not tracked regularly and there is no process to inform Finance if they are unpaid and become overdue;
- these weaknesses suggest that the Council is not accounting for the true amounts due from s106 agreements; and
- as a consequence it would appear that the Council cannot demonstrate that it is securing value for money in the use of its resources.

The objector requested that we issue a Report in the Public Interest under section 24 of the 2014 Act in relation to the above issues. These concerns formed the basis of the work performed by KPMG to determine if the Council has appropriate process and controls in place for its s106 agreements to secure economy, efficiency and effectiveness in the use of resources, and to ensure complete and accurate accounting for the sums due.

Structure of this report

This report is structured as follows:

- Section 2 summarises the headline messages.
- Section 3 sets out our key findings from our work performed.
- Section 4 outlines our recommendations to the Council in relation to the controls weaknesses found.
- Section 5 concludes on the objections and comments on future changes to planning contribution arrangements.



Section two: Headlines

Headlines

<p>This table summarises the headline messages for the Authority.</p> <p>Sections three and four of this report provide further details on each area.</p>	<p>Overall conclusion</p>	<p>From our work performed, while we have recognised some appropriate controls we have concluded that there are weaknesses in the Council’s arrangements for monitoring developer contributions due to the Council through s106 agreements. Although we have found no evidence that these weaknesses have led to any financial loss, they have led to the Council failing to identify on a timely basis significant amounts which have become payable from developers, particularly Cranbrook, and consequently to the understatement of these amounts in the Council’s financial statements.</p>
	<p>Procedural weaknesses</p>	<p>Through our procedures to gain an understanding of the s106 contributions system, we have identified three control weaknesses:</p> <ol style="list-style-type: none"> 1. absence of summarised financial information to facilitate the monitoring of s106 contributions; 2. lack of challenge or enforcement of the Cranbrook developers’ legal obligation to provide information; and 3. understanding of financial and accounting implications of triggers being met and the communication between Planning and Finance over these. <p>For each weakness noted we have raised a recommendation and these are detailed further in Section Four of this report along with responses from Management.</p> <p>It is important to recognise that we have not found any control weaknesses within the recording or seeking payment process, once a s106 agreement is entered into the debtor system and an invoice is raised.</p>
	<p>Completeness & accuracy of financial statements</p>	<p>As at 31 March 2016 the Council had £5.8 million of s106 contributions held on its Balance Sheet. During the 2015/16 financial year it accounted for £1.9 million of s106 receipts.</p> <p>We found that at the Balance Sheet date there was a gross amount of £636,000 in s106 contributions due to the Council where it had not identified that conditions had been met which triggered liability for payment from the relevant developer. No invoices had been raised seeking payment and consequently this amount had not been included in the 2015/16 financial statements, meaning the accounts were understated.</p> <p>When other audit findings are taken into account there was a net understatement of £227,000 in the Council’s financial statements. This is because our financial statements audit work had separately identified that the Council had incorrectly accounted for an amount totalling £409,000 for a different s106 agreement which actually related to another body.</p>
	<p>Objection outcome</p>	<p>Whilst we have not designated this as a Report the Public Interest, as sought by the objection, our work has indicated that the issues raised by the objector are correct. We are therefore issuing three recommendations for improvement under section 27(6) of the 2014 Act.</p>



Section three: Findings

Here we define the s106 contributions and the obligations of the agreements

Prior to outlining the detailed findings from our audit work, it is important to define what s106 agreements are, to explain who the obligation to pay the contribution lies with and the definition of a minor development.

Section 106 agreement definition

The Planning Advisory Service defines s106 agreements as follows:

“Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), commonly known as s106 agreements, are a mechanism which make a development proposal acceptable in planning terms, that would not otherwise be acceptable. They are focused on site specific mitigation of the impact of development and are often referred to as ‘Developers’ Contributions’.”

Whilst they can be used to impose non-financial conditions on planning approval, they are also commonly used to secure financial contributions towards investments in infrastructure or other demands on public services associated with a particular development. As a planning authority, the Council is responsible for agreeing, recording and monitoring these agreements on its behalf and also on behalf of other public bodies.

Obligation of agreement

The payment mechanism for s106 agreements will vary from case to case, but there are often trigger points at which certain conditions must be fulfilled before payment becomes due (in total or in part). For example, for a housing development the payment of all or part of an agreed s106 financial contribution may not be triggered unless and until a certain number of the total planned housing units has been completed and occupied. There can be more than one trigger point leading to multiple points at which payment may become due.

It is important to note that the obligation to pay the contribution rests with the developer and it is for them to ensure all s106 contributions agreed to are paid when relevant conditions are met. If the developer fails to meet this obligation, penalty interest is charged to the outstanding contribution. However, this does not mean that local authorities should not have appropriate arrangements in place to track progress against these trigger points. As the ultimate recipient of the s106 agreement monies, councils have a self-interest to ensure this is appropriately monitored.

Minor Development

Whilst the majority of s106 income typically comes through larger developments, councils can also be involved in numerous agreements in relation to minor developments. A minor development is generally an application involving contributions ranging from hundreds to several thousands of pounds. The Council receives hundreds of minor development applications per annum.

We document here our understanding of the processes and controls in place at East Devon District Council to monitor s106 agreements.

Process and Controls System

There are two processes in place at the Council for the monitoring of s106 contributions, depending on the size of the development, and a single process for the collection of invoiced amounts. The objection relates to the recording, monitoring and seeking payment of contributions due to the Council and from our work we have not found any control weaknesses within the recording or seeking payment process, once a s106 agreement is entered into the debtor system and an invoice is raised. As a result our commentary here focuses only on the monitoring process.

Minor Developments

At present for all developments but Cranbrook, the monitoring process is reactive and consists of either relying on developers paying contributions on time when trigger points are reached, or the Council identifying this through either a Land Registry search being performed by a purchaser's Solicitor, where the Land Registry informs the Council of the search. The Council uses Parish visits to identify circumstances indicating that payment is now due. As a result of the monitoring process being reactive, there is currently no summarised information in place which shows the Council how many contributions are outstanding and therefore allows the proactive identification of any that may be in breach of their agreement.

Cranbrook

The Cranbrook development is both large in size and high in complexity with a multiple of both financial and non-financial arrangements in place to ensure the delivery of the development. As a result of the scale of the development and the complexities involved in managing it, the Council has a dedicated team in place to deliver the development and as part of this, the s106 contributions. There are a number of different trigger types at the Cranbrook site; pre-commencement to work at any or certain parts of the development; payment before a number of houses are occupied over the entire or separate parts of the development; the obtaining of planning permissions; or after a certain number of houses are occupied. Triggers relating to occupations are the most difficult to monitor as the other triggers are easier to identify.

As previously noted the responsibility for notifying the Council of a contribution rests with the developers and under clause 7.4 of the Cranbrook s106 agreement, the developers are obliged to provide the Council with details of the number of dwellings constructed, sold and occupied on a quarterly basis. Only information on completions is supplied, however, which does not specify the number of properties sold or occupied, meaning there is a gap in information at the Council on the number of dwellings occupied. In addition, the information is provided on an ad hoc basis and at the time of concluding our fieldwork (15 September 2016) the last return received was for the quarter ended 31 March 2016.

Monitoring of the Cranbrook contributions is done by the Cranbrook team through periodic checks with the Council Tax team to determine when properties have become registered for Council Tax; periodic communication with E.on to determine the number of heat transfer units (District Heating System connection) that are fully commissioned and from review of the completion information provided in the returns from developers.

We document here our evaluation of the control weaknesses in the Councils current s106 process

From the understanding gained of the Council's current processes in place we found that in general the Council has reasonable controls, and indeed the implementation of communication with E-On shows the Council responding thoughtfully to the circumstances of the Cranbrook development. It is noted, however, that the strength of these processes is only as good as the completeness and timeliness of their operation. There is significant reliance on developers to notify and pay the Council when trigger points are reached.

Despite the Council implementing mitigating controls, there is evidence that there are weaknesses in these controls and whilst there is understanding of contributions by site, it cannot be assured that the Council has a complete and accurate record of s106 contributions that have been triggered at any point in time.

Our evaluation of the processes has identified the following control weaknesses.

1. An absence of summarised financial information to facilitate the monitoring of s106 contributions

The Council currently has no summarised monitoring document which shows the value of all s106 contributions outstanding at any one point, with the trigger which would lead the contribution to be payable and, if the contribution is liable to be paid, the current status of the collection process. In addition to this the Council does not currently have the information in a format which is consistent with s106 contribution triggers so it cannot determine if triggers have been met.

2. Lack of challenge or enforcement of the Cranbrook developers' legal obligation to provide information

From our understanding there is no challenge or enforcement of the developers' legal obligation to provide the Council with details of the number of dwellings constructed, sold and occupied, instead only information on completions is supplied. In addition this information should be received quarterly but our testing suggests that it is received on an ad hoc and untimely basis.

3. Understanding of financial and accounting implications of triggers being met and the communication between Planning and Finance over this

It has been found that at present there is a gap in the understanding of the financial and accounting implications of a contribution trigger being met within Planning, due to an oversight in communication between Finance and Planning over the treatment. When contributions become virtually certain to be received, but are not invoiced for practical or commercial reasons, they should be recognised as accrued income. At current however, given this gap in understanding in the planning team, the Council's Finance team only accounts for s106 contributions when the cash has been received or an invoice has been raised. This has led to the financial accounts having an incomplete accrued income balance on the Statement of Financial Position.

Section three – Findings

Testing Results

This section sets out the results of testing procedures that we performed.

Our testing identified a gross understatement at 31 March 2016 of £636,000 in the Council's financial statements.

This illustrates the impact of the control weaknesses considered on the previous page.

In addition to the evaluation of the s106 processes and controls, we performed testing to enable us to quantify the potential misstatement as a result of the control weaknesses found in the system. We focused this testing on s106 agreements associated with the Cranbrook development, as these agreements (individually and in total) represented the major value of all agreements in place. We requested a listing to be prepared of all s106 contributions that the Council has in place at the Cranbrook site and found that there were nine contributions that had been triggered and are due to the Council. It was also found that there was a tenth contribution where it was uncertain if the trigger point had been met and the financial value of the contribution, this is therefore not included within the misstatement below. The contributions ranged from £5,000 to £200,000 in value individually, see page 12 for further details. It was found that the planning Officer was aware of the individual cases, but not the aggregate position of the un-invoiced amounts. None of the contributions had been invoiced or accrued in the financial statements but as noted previously, there is no evidence of financial loss and the misstatement is one of accounting treatment. If the total value of this misstatement was recognised in the Council's accounts, the Grants in Advance balance would increase by £636,000, as documented below.

It is noted however that this is the *gross* misstatement as a result of the weaknesses in the system and that our final accounts audit procedures had already identified a misstatement that overstated the Grants in Advance balance by £409,000. This was because the Council had incorrectly accounted for a s106 contribution due from a developer but payable to another body, rather than the Council itself. Consequently, when concluding effect of these misstatements on our audit opinion, we were able view the impact at 31 March 2016 as a *net* understatement to the balances is £227,000. This was reflected in our reporting to the Council's Audit & Governance Committee in September 2016.

Whilst neither the gross or net misstatement were considered individually material to the financial statements, they are nevertheless significant sums. Given the weaknesses identified in the Council's controls, it is possible that understatements of a similar scale or even larger could be apparent at any point in time.

Impact (£)						
No.	Income and expenditure statement	Movement in reserves statement	Assets	Liabilities	Reserves	Basis of audit difference
1			636,000	(636,000)		Understatement due to contributions being triggered but not accrued in the financial statements.
2			(409,000)	409,000		Removal of s106 agreement debtor invoiced to developer but due to another body, not the Council (reported in our ISA 260 dated 12 th September 2016).
			£227,000	£227,000		Total impact of adjustments

Section three – Findings

Testing Results

This section sets out the detail of the contributions not accrued for, following on from page 11.

No.	Obligation	Amount (£)	Triggered?	Invoiced?	Reason for non inclusion in Accounts
1	Open Space and Play areas	150,000	Y	N	For the Open Space and Play facilities contributions, the s106 agreement requires further details to be agreed before an invoice will be raised, such as the location of the equipment or a grounds condition report. The amount is technically due to the Council however and as such should be accrued on the Statement of Financial Position.
2	Open Space and Play areas	35,000	Y	N	
3	Open Space and Play areas	35,000	Y	N	
4	Open Space and Play areas	200,000	Y	N	
5	Open Space and Play areas	48,000	Y	N	
6	The Country Park and Nature Reserve	35,000	Y	N	Due to a planning Officer leaving the Council, the invoice was not raised when the trigger was met. Finance were not made aware of the trigger being met and did not accrue for the income.
7	New Community Officer	43,000	Y	N	
8	Landscaping	5,000	N/A	N	As with the Open Space and Play Facilities, the s106 agreement requires further details to be agreed before an invoice will be raised. The amount is technically due to the Council and should be accrued on the Statement of Financial Position.
9	Exe Estuary and Pebblebed Heaths SAC and SPA	85,000	Y	N	As a result of the gaps in the information received by the Council from developers, it had been uncertain as to when the trigger point had been met. At the time of our understanding in September, the trigger had been met and the amount was due to the Council and should have been accrued for.
Total		636,000			

Value for Money

We document the impact of the s106 findings on our Value for Money conclusion

As part of the objection, the local elector asserted that the weaknesses in the Council's arrangements for monitoring and collecting amounts due under s106 agreements meant that it cannot demonstrate that it is securing value for money in the use of its resources. We therefore considered what impact the results of our audit work had on our value for money audit responsibilities, where under the Code of Audit Practice we report on the Council's arrangements for securing economy, efficiency and effectiveness in the use of resources.

We concluded that the issues identified in this report were not significant enough to impact on our VFM conclusion overall. This is because:

- whilst our work has identified weaknesses as described in this report, there are aspects of the Council's controls and processes which were found to be reasonable in their design and operation;
- whilst from our testing the value of the understatement of s106 monies accounted for was found to be significant at 31 March 2016, this shortfall was not considered material;
- the weaknesses identified are contained to a specific area and therefore are not pervasive enough to impact on the VFM conclusion overall, which is an assessment about the Council's overall value for money arrangements

In addition, through our interaction with the Council during our audit work, management have demonstrated an awareness of the inherent difficulties in the collection of s106 contributions from developers and have, where possible, implemented initiatives to attempt to monitor contributions that have fallen due but have not been notified. As noted on page 9, these include collaboration with the Cranbrook energy provider (E.On), the Council's own Council Tax department, on-site visits and following up on information received from the Land Registry department.

In addition to this, with the introduction by the Council of the Community Infrastructure Levy (CIL), the Council is implementing an improved monitoring and tracking of contributions, including historical and future s106 contributions, further supporting the Council's commitment to improving its collection of contributions. Further details of this have been included in Section 5, page 19.

Based on the above, in September 2016 we issued an unqualified VFM conclusion as part of our audit report on the Council's 2015/16 financial statements.

This outcome does not, however, mean that there are no issues relating to value for money. The weaknesses identified clearly indicate scope for improvements to be made to the Council's controls and processes for assuring the complete, accurate and timely receipt of financial contributions from developers. The next section of this report considers our recommendations arising from this audit.



Section four: Recommendations

Section four - Recommendations

Key issues and recommendations

Following from the Understanding of the monitoring of the s106 contributions system, we have identified three process weaknesses. For each weakness we have made control recommendations.

For each recommendation we have given a risk rating and agreed what action management will need to take.

The Authority should closely monitor progress in addressing specific risks and implementing our recommendations.

We will formally follow up these recommendations next year.

Priority rating for recommendations

1	Priority one: issues that are fundamental and material to your system of internal control. We believe that these issues might mean that you do not meet a system objective or reduce (mitigate) a risk.	2	Priority two: issues that have an important effect on internal controls but do not need immediate action. You may still meet a system objective in full or in part or reduce (mitigate) a risk adequately but the weakness remains in the system.	3	Priority three: issues that would, if corrected, improve the internal control in general but are not vital to the overall system. These are generally issues of best practice that we feel would benefit you if you introduced them.
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No.	Risk	Issue and recommendation	Management response / responsible officer / due date
1	1	<p>Absence of summarised financial information</p> <p>The Council currently has no summarised monitoring document which shows the value of all s106 contributions outstanding at any one point, with the trigger which would lead the contribution to be payable and, if the contribution is liable to be paid, the current status of the collection process. In addition to this the Council does not currently have the information in a format which is consistent with s106 contribution triggers so it cannot determine if triggers have been met.</p> <p>Recommendation</p> <p>Develop a record of all s106 contributions detailing the financial contributions expected, the relevant trigger and current collection status.</p> <p style="text-align: right;">(Cont^d)</p>	<p><i>Management Response</i></p> <p>The planning service has always monitored S106 contributions recording them on a site by site basis including the trigger points, if payment is due and the current status of that payment. This is sufficient for the requirements of Planning, however we can appreciate the requirement to understand the total value of all outstanding contributions for financial monitoring purposes.</p> <p>As set out in the audit report the obligation to pay rests with the developer and it is for them to ensure all s106 contributions agreed to are paid when relevant conditions are met. If the developer fails to meet this obligation, penalty interest is charged to the outstanding contribution. Monies are still recoverable. The Council accepts improvements are required to track progress against these triggers on a district wide basis and in an easily reportable format.</p>

Section four - Recommendations

Key issues and recommendations (cont.)

Following from the Understanding of the monitoring of the s106 contributions system, we have identified three process weaknesses. For each weakness we have made control recommendations.

For each recommendation we have given a risk rating and agreed what action management will need to take.

The Authority should closely monitor progress in addressing specific risks and implementing our recommendations.

We will formally follow up these recommendations next year.

No.	Risk	Issue and recommendation	Management response/responsible officer/due date
1	1	<p>Absence of summarised financial information (cont'd)</p> <p>This record should be accessible to Finance to inform the recognition of s106 income and the raising of invoices. The Council should also ensure that it has its monitoring information in a format which is consistent with the s106 agreements. This will allow the Council to more accurately track the outstanding debts owed to it and ensure prompt payment.</p>	<p><i>Management Response (cont'd)</i></p> <p>It is accepted that the current system is in need of improvement and we had already taken the decision to update the system to address this and the introduction of CIL. Delays in the adoption of CIL as a result of the examination into our charging schedule being put on hold for over a year delayed the implementation of this new system. The new system is now in place and once the data from the existing S106 agreements has been input the necessary data will be available and in the required format.</p> <p><i>Responsible officer</i> Service Lead - Planning Strategy and Development Management</p> <p><i>Due date</i> 31 March 2017</p>
2	1	<p>Enforcement of legal obligations</p> <p>From our understanding there is no challenge or enforcement of the developers' legal obligation to provide the Council with details of the number of dwellings constructed, sold and occupied, instead only information on completions is supplied. In addition this information should be received quarterly but our testing suggests that it is received on an ad hoc and untimely basis.</p> <p>This means that there is a risk that the Council has inaccurate information on which to track outstanding s106 contribution monies. (Cont'd)</p>	<p><i>Management Response</i></p> <p>It is understood that this issue and recommendation relates specifically to Cranbrook. This issue will be addressed with the developers and we will seek the full information required and express upon the developers the importance of us having this information in a timely manner and ensure that we do.</p> <p><i>Responsible officer</i> Service Lead - Planning Strategy and Development Management</p> <p><i>Due date</i> 31 December 2016</p>

Section four - Recommendations

Key issues and recommendations (cont.)

Following from the Understanding of the monitoring of the s106 contributions system, we have identified three process weaknesses. For each weakness we have made control recommendations.

For each recommendation we have given a risk rating and agreed what action management will need to take.

The Authority should closely monitor progress in addressing specific risks and implementing our recommendations.

We will formally follow up these recommendations next year.

No.	Risk	Issue and recommendation	Management response/responsible officer/due date
2	1	<p>Enforcement of legal obligations (cont'd)</p> <p>Recommendation</p> <p>Ensure the information provided by developers is in line with that required under the s106 agreements. Any delayed returns from developers should be followed up on a timely basis to ensure that complete information is obtained and payment of contributions is made.</p>	<i>(Continued from previous slide)</i>
3	1	<p>Understanding of financial and accounting implications of triggers being met and the communication between Planning and Finance over this</p> <p>It has been found that at present there is a gap in the understanding of the financial and accounting implications of a contribution trigger being met within Planning, due to an oversight in communication between Finance and Planning over the treatment. When contributions become virtually certain to be received, but are not invoiced for practical or commercial reasons, they should be recognised as accrued income. <i>(Cont'd)</i></p>	<p><i>Management Response</i></p> <p>This recommendation is accepted and there is now an understanding in place with the Planning Service that once a condition for payment has been reached, even if an invoice is not to be raised at that point for whatever reason, then Finance need to be aware in order to properly account for the accrued income.</p> <p><i>Responsible officer</i></p> <p>Strategic Lead - Finance</p> <p><i>Due date</i></p> <p>31 March 2017</p>

Section four - Recommendations

Key issues and recommendations (cont.)

Following from the Understanding of the monitoring of the s106 contributions system, we have identified three process weaknesses. For each weakness we have made control recommendations.

For each recommendation we have given a risk rating and agreed what action management will need to take.

The Authority should closely monitor progress in addressing specific risks and implementing our recommendations.

We will formally follow up these recommendations next year.

No.	Risk	Issue and recommendation	Management response/responsible officer/due date
3	1	<p>Understanding of financial and accounting implications of triggers being met and the communication between Planning and Finance over this (Cont'd)</p> <p>At current however, given this gap in understanding in the planning team, the Council's Finance team only accounts for s106 contributions when the cash has been received or an invoice has been raised. This has led to the financial accounts having an incomplete accrued income balance on the Statement of Financial Position.</p> <p>Recommendation</p> <p>Money due to the Council under s106 agreements should be accrued for as soon as the Council becomes aware that conditions for payment have been triggered. Regular communication between Finance and Planning, to ensure that Finance are aware of when triggers have been met, should be implemented.</p>	<i>(Continued from previous slide)</i>



Section five: Conclusion

Future Changes and Conclusion

We document here the future changes and conclusion on the Objection received

Future Changes – Exacom

As previously noted on page 13, the Council has implemented a new IT system, Exacom, and associated processes for the introduction of the CIL, which has become operational during the current financial year. The CIL is a levy whereby the Council can charge per square metre on the net additional increase in floor space of any development. As the levy will be a set rate per square metre, there will be increased level of certainty over the rates charged. In addition, collection of the levy will be carried out by the Council, rather than it being the obligation of the developers to pay a contribution when it becomes due linked to variable other conditions.

The levy is due when a chargeable development is commenced with the terms of the relevant planning permission, meaning that there is increased certainty of when the levy becomes due. The levy's payment procedures encourage payment prior to development being commenced.

When planning permission is granted, the Council will issue a liability notice that will be due for payment when the development is commenced, the payment procedure and possible consequences for not following the procedures.

To help monitor and track CIL and s106 contributions, the Council has introduced the Exacom software program from September 2016 which will show s106 contributions and levies agreed, along with trigger points and outstanding amounts. Along with this, the Council has taken on additional resource to input the data from the current system, to the new program which will help with the monitoring of the contributions.

Conclusion

Our assessment of the Council's arrangements related to s106 agreements and our own sample testing indicate that there is a need to strengthen the controls and processes in place. This, in turn, will help ensure that the Council's accounts reflect a complete and accurate value of s106 monies due to it at any point in time, and that sums due to the Council are collected on a timely basis.

On the basis of our findings, we have concluded that the issues raised in the elector's objection are correct. Although we are issuing this report, we have not designated it as a Report in the Public Interest under section 24 of the 2014 Act, for the reasons summarised on page 13.

However, it is important that the Council considers the issues identified through our work and ensures that necessary improvements are made, both to ensure that financial contributions from historical and future s106 agreements are managed effectively and that the sound systems and controls for CIL are established from the outset. We are therefore making three recommendations under section 27(6) of the 2014 Act. The Council has set out its response to our recommendations in Section 4 of this report. We will follow up on progress against these recommendations as part of our audit work in 2017.



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The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

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