

Regulation 19(b) statement
Summary of CIL representations

- 1* There should be exemptions to CIL
 There should be greater clarity on implementation

- 2 The proposals will reduce the funding to villages in favour of towns

- 3 The charge should be applied to all development
 Council Tax should pay for infrastructure
 The charge will penalise developers and prevent development
 Charging per square metre is not an appropriate basis
 House prices will rise
 The approach to viability assessment is too blunt
 The charge per unit should be capped

- 4 No comment

- 5 Infrastructure should include woodland
 Support reference at paragraph 2.10 to Green Infrastructure
 Specific reference should be made to woodland

- 6 The rate proposed is excessive compared to Exeter and Plymouth's
 Evidence on land sale prices is flawed
 CIL will cost more than Section 106 so affordable housing assumptions are wrong
 Charge of £60 to £70 would better reflect local circumstances

- 7 The charge will deter development
 The document is confusing about parish funding

- 8 No comment

- 9 Development is to be allowed which is not viable
The local developer in the evidence should be named
Queries independence of advice and the economic climate when studies were done
No justification given for reducing retail charge to zero
All B1, B2 and B8 developments should pay CIL
Charge should be increased
- 10 Charge is not modest and house prices will rise because of it
CIL funds should be spent where development takes place
Should be relief for rural development
No reference to temporary dwellings
Floorspace should be internal
£90 charge is not justified
- 11 Other funding sources not addressed properly i.e. existing Section 106 funds and New Homes Bonus
Revenue yield is higher than stated so the infrastructure gap is exaggerated
Large scale retail, leisure and hotels should pay
Assumed build costs and profit levels are too small
- 12 Support charging per square metre rather than £10,000
Brownfield sites should have a lower charge
Costs of new development should not fall on existing residents
£90 is too low
Businesses should pay CIL
CIL could be used to promote town centre development
- 13 CIL should not apply to rural occupational dwellings
Basis for charge is too urban focussed
It will have a negative effect on rural economies
Rural development providing affordable housing should be exempt
Rural areas should have a differential rate

- 14 The Infrastructure Plan should refer to flood defence infrastructure
- 15* The methodology is generally supported but
- The number of example sites should be larger
 - Assumptions of funding on the strategic sites are unrealistic
 - There should be a landowner profit in the sale of land
 - The low availability of finance will increase development costs
 - The use of a 22.5% affordable housing figure is not justified
 - The reference to code for sustainable homes costs is supported
 - Site servicing costs at £100,000 per acre are unrealistic and should be £250,000 per acre
 - Evidence not supplied to support maximum land values
 - No finance from Section 106 agreements is unrealistic
 - A viability buffer should be included
- 16* Concern at the reduction in the CIL rate which will have implications for the provision of infrastructure
- Evidence to justify the reduction has not been provided
- Assumptions on affordable housing should not prejudice the delivery of infrastructure
- 17* The supporting evidence is faulty as follows
- Uplift assumptions are optimistic
 - Sales values are overly optimistic
 - Approach to strategic infrastructure is not justified
 - Affordable housing assumptions do match adopted policy
 - The impact of Section 106 funding is not recognised
- 18 The original levy is supported
- CIL should be spent on the infrastructure directly related to development
- The planned infrastructure only addresses large projects
- CIL will be less divisive if a large proportion is given to parish/town councils
- 19* The CIL rate is too high and is not viable
- Rates should be differential
- The 22.5% affordable housing assumption is not based on policy
- Uplift assumptions are not justified
- The approach on abnormal costs is not justified

Generic site information does not reflect realistic development sites

- 20 The charging schedule should not include separate entries for large and small retail
- 21* Charging schedule should have regard to meeting the needs of older people
Viability assumptions do not have regard to greater costs of retirement housing
Site examples should include an edge of centre brownfield site
Specialist housing should be excluded like Class C2 housing is.
- 22 Disappointed that the proportion for town and parish councils has not been defined
The proportion should be subject to consultation
- 23* The assumption of 22.5% affordable housing will 'lock in' provision to that level
A lower level of CIL Charge should be set for brownfield sites
Council should set out what it will collect funding for through Section 106 Agreements
The viability assessment should include a 'buffer' in viability assessments
Number of sites appraised is too low
Affordable housing is wrongly assumed to be affordable rent
Specialist housing for older people should have a lower CIL Charge
CIL may put the cross subsidy of affordable housing on exception sites at risk
- 24 Residential institutions should have a smaller levy
The approach will mean that some infrastructure will not be funded
- 25 No comment
- 26 Exemptions should be made for small developments
Extensions and loft conversions should pay CIL
- 27 The document contradicts itself in the bullet points at 1.3
The charge will make development unviable
Industry and retail developments should not be let off

*** - Representations marked with an asterisk include a request to appear at the Examination**