

Basildon Borough Council
Community Infrastructure Levy:
Preliminary Draft Charging Schedule
Statement of Consultation

June 2019

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1. Introduction

- 1.1 The Community Infrastructure Levy (CIL) is a charge that local authorities can set on new development in order to raise funds to help deliver infrastructure to support development.
- 1.2 On 18 October 2018, Full Council approved a Preliminary Draft Charging Schedule for a 6 week public consultation as a first step to introducing a CIL for Basildon Borough. The Council's commitment in principle to introducing a CIL is set out in the Local Development Scheme 2018 - 2020, as approved on 20 July 2018.
- 1.3 The CIL Preliminary Draft Charging Schedule was the subject of consultation from 1 November 2018 until 17 December 2018. This consultation ran concurrently with the Pre-Submission Regulation 19 consultation of the Basildon Borough Revised Publication Local Plan.
- 1.4 This Statement of Consultation explains how the consultation was promoted, how people were engaged and how information was made available for residents and other stakeholders. It summarises the results of the consultation, highlighting the key issues to assist the Council in refining its CIL in accordance with the Regulations and submitting it to the Secretary of State for examination.

2. Preliminary Draft Charging Schedule Consultation

- 2.1 In order for a Community Infrastructure Levy (CIL) to be adopted, it is required by the CIL Regulations 2010 (as amended)¹ that the Council holds a minimum of two rounds of public consultation. The first round of consultation to be held is concerned with the Preliminary Draft Charging Schedule (PDCS) and the second with the Draft Charging Schedule (DCS).
- 2.2 In accordance with Regulation 15, the Council sent a copy of the PDCS and supporting evidence to, and invited comments from, each of the consultation bodies listed in Reg. 15 (3) and invited representations from residents, businesses and voluntary bodies in the proposed charging area as set out in Reg. 15 (5).
- 2.3 This included letters or emails being sent to the statutory bodies, as well as all organisations, businesses and individuals registered on the Council's Local Plan consultation database.

¹ <http://www.legislation.gov.uk/uksi/2010/948/regulation/15/made>

Communication and Engagement

- 2.4 As the adoption of a CIL is embedded within planning legislation, regulations and guidance and its purpose is to support the funding of infrastructure associated with the planned growth set out within the statutory Development Plan, it was considered appropriate to align the public consultation for CIL with the adopted Basildon Borough Statement of Community Involvement (SCI).
- 2.5 The SCI specifies the consultation process for all planning procedures that are the responsibility of Basildon Borough Council, including the preparation of local planning policies. As such the SCI 2016, along with statutory consultation requirements of Regulation 15 of the CIL Regulations, helped form the basis for planning the consultation in order to ensure the best possible engagement could be achieved.
- 2.6 The Communication and Engagement included:

Direct Notification

- 2.7 As a consequence of past consultation activities on the preparation of the Development Plan and its supporting documents, the Council maintains a database of consultees including all statutory consultees e.g. Environment Agency, Essex County Council, etc.; a range of non-statutory interest groups e.g. RSPB, Essex Wildlife Trust, etc.; other stakeholders with an interest in the borough such as developers and employers etc.; infrastructure and service providers such as Network Rail, Anglian Water, etc.; and also all residents who had provided consultation responses to the previous Core Strategy 2012/2014 and Draft Local Plan/ New and Alternative Sites 2016. This database is maintained in accordance with the [Strategic Planning Privacy Notice](#)². Depending on the contact details held, either a letter or an email was sent to each of these consultees notifying them of the consultation, identifying where a copy of the consultation documents could be found, how additional information could be accessed, how comments could be made, and the deadline to make submissions by.

Website

The CIL PDCS, a Consultation Response booklet, and links to the relevant evidence base were published on the Council's website at www.basildon.gov.uk/CIL

- 2.8 During the consultation, information about the consultation was provided alongside consultation information on the Revised Publication Local Plan which was being held at the same time. This included a hero image on the

² <https://www.basildon.gov.uk/privacy-strategic-planning>

home page of the Council's main website www.basildon.gov.uk informing people about the consultations.

2.9 Information on the consultation and an alternative way to respond was also available on the Council's online Planning Policy Consultation portal.

Formal Media

2.10 The council advertised the CIL consultations through three press releases – at the beginning, middle and end of the consultations - to promote the consultation and advise people how they could get involved. These are shown in Appendix E.

2.11 To supplement this, eight half page, colour graphic adverts were placed in the Basildon Echo, Yellow Advertiser, Billericay and Wickford Gazette and Essex Enquirer newspapers during the consultation period.

Stakeholder Workshops

2.12 On the 26 of November 2018, the Council held two workshops to provide more information on the PDCS.

2.13 The first workshop was aimed at Service and Infrastructure providers who could benefit from CIL investment in the future. This was attended by representatives from the NHS, Essex County Council, Essex Police and Essex Fire and Rescue.

2.14 The main issues discussed sought:

- Clarifications on the impact pooling restrictions might have on potential infrastructure projects;
- Enquiries on how the CIL receipts will be distributed; and
- Discussions with infrastructure and service providers encouraging them to update their infrastructure needs through engagement with the council's preparation of its Infrastructure Delivery Plan.

2.15 The second workshop was targeted at agents, landowners and developers who would be able to provide constructive feedback into the independent CIL viability assessment.

2.16 The second workshop was underpinned by a presentation by Council officers that set the scene to CIL followed by a discussion on the main issues of concern for the agents, landowners and developers. The main issues raised were:

- Feedback on the assumptions and methodology used in the independent viability study;
- Calls for transparency regarding what the Council intended to fund through CIL and S.106 contributions, to avoid developments being charged twice for the same item of infrastructure;
- Concern that there was a lack of balance between additional investment sought through CIL to support development and the potential effect on the viability of developments;
- Objections to the intended scale of CIL rates for residential developments in Billericay and Wickford; and
- Some concern that the IDP can become out of date quickly and should not be relied on to inform the CIL.

Business Engagement

2.17 The Planning Policy Team had a stand at the Basildon Business Expo held at the Holiday Inn, Basildon on 22 November 2018 to raise the profile of what the Local Plan and CIL could do for businesses and investment in the future and encourage business leaders to respond. More than 230 visitor tickets were sold in advance of the event and 54 other businesses were also exhibiting.

2.18 An article on the Local Plan and CIL consultations was also included within the “Bas for Business” e-newsletter on 4 December 2018, a copy of which is in Appendix E. This was sent to more than 2,300 local business subscribers. On 5 December 2018 a Planning Policy Officer attended a Basildon Business Group meeting where a presentation was given to representatives of key business and partner organisations within the Borough about the Local Plan and the CIL, the consultations and how to respond. This was then followed by a discussion on the proposals.

Consultation Material and Availability of Documentation

2.19 The Council produced a CIL consultation response booklet to assist those wishing to make a representation. To comply with the General Data Protection Regulations (GDPR) 2018, the booklet also contained the Council’s privacy notice and required responders to read and agree with it.

2.20 The PDCS and relevant evidence was made available for free public inspection at the following locations: within the Basildon Centre and at Basildon, Laindon, Pitsea, Billericay, Fryerns, Vange and Wickford libraries.

2.21 The documentation was also made freely available on the Council's dedicated webpage www.basildon.gov.uk/CIL .

Making Representations

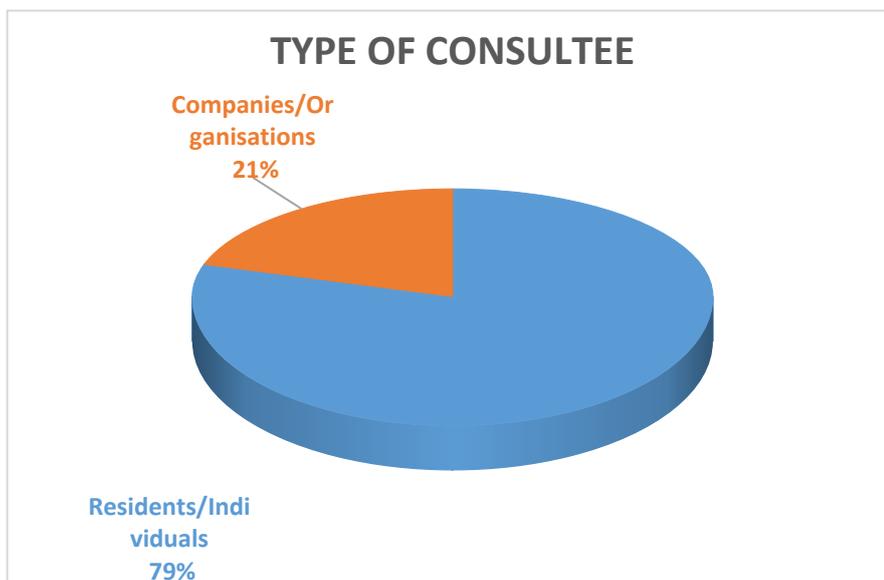
2.22 There were a number of ways that people could make comments and these were documented in the consultation material, notification letters, and on the Council's website. The Council encouraged the use of the blue Consultation Response Booklets and the online Consultation Portal, as a means to make representations as these provided guidance on the technical nature of the consultation and helped ensure compliance with the General Data Protection Regulation 2018. However comments were welcomed in other formats including free form letters and emails. Comments could therefore be submitted online, by email or on paper.

2.23 Whilst only written representations could legally be accepted, representatives from the Planning Policy Team were available to answer questions on the consultation at one-to-one advice sessions, at organised meetings and events, over the telephone and in person at the Basildon Centre. The consultation aimed to be as inclusive as possible to all interested parties.

3. Key Consultation Statistics

3.1 A total of 86 responses were received during the consultation. 79% (68) of the consultation responses were received from residents, while the remaining 21% (18) were made by private companies and organisations. The vast majority of these representations were submitted by post and email; although web submissions did make up nearly one-third of the comments received.

Figure 1: Type of Consultee



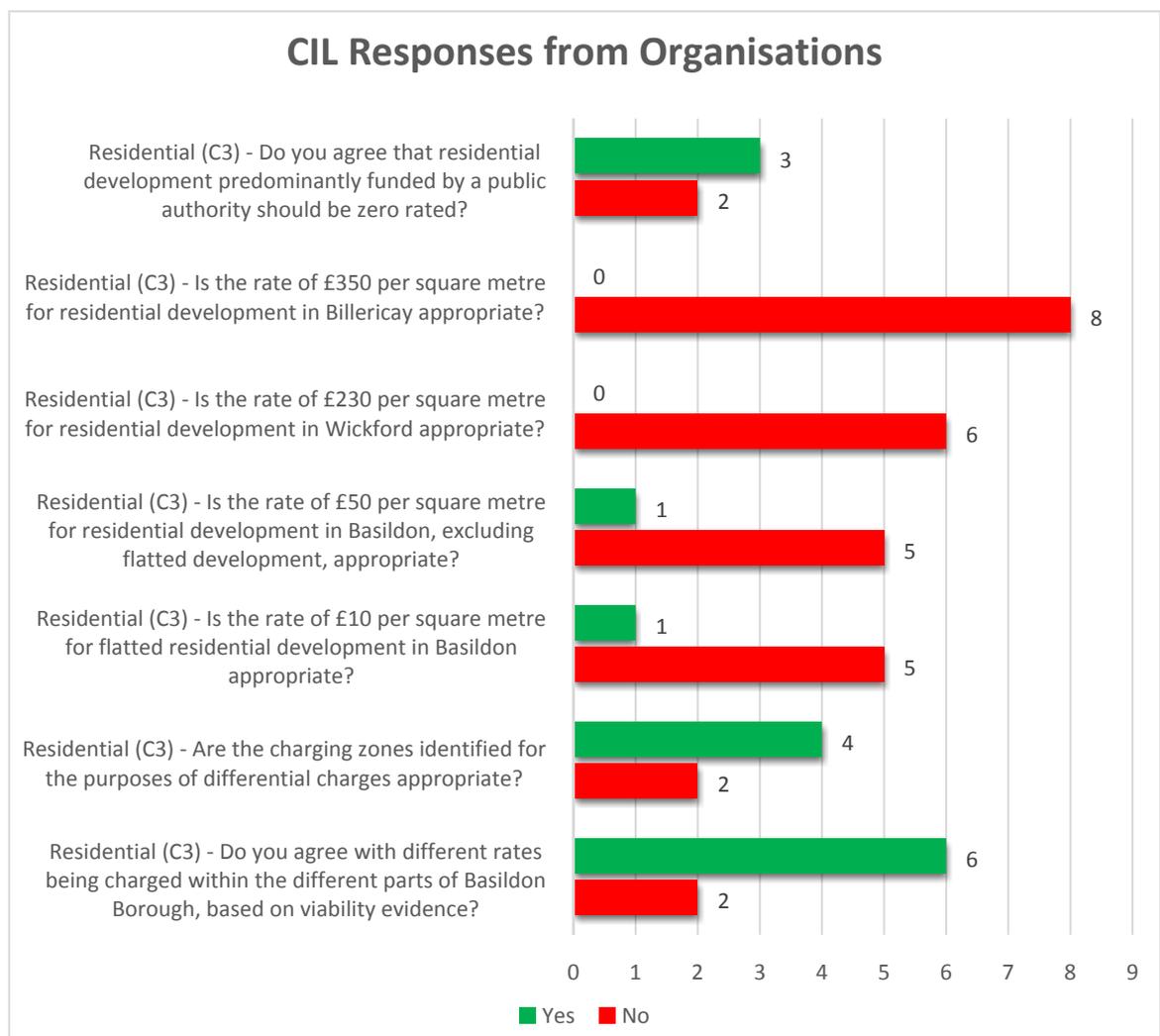
3.2 There were also 7 comments that were either duplicates or were blank as they were not clear who the consultee was.

Key Consultation Statistics for Companies or Organisations

3.3 A total of 18 responses were received from companies or organisations. The companies/organisations include statutory consultees, non-statutory interest groups, developers and business representatives. The vast majority of these representations were submitted by email. The consultation form invited consultees to provide their views through a series of questions followed by an opportunity to provide more detailed written observations.

3.4 The majority of the companies/organisations provided detailed and technical written comments to the consultation and a few offered views to the questions on the form. A summary of these views is provided in Figure 2.

Figure 2: CIL Responses from Organisations



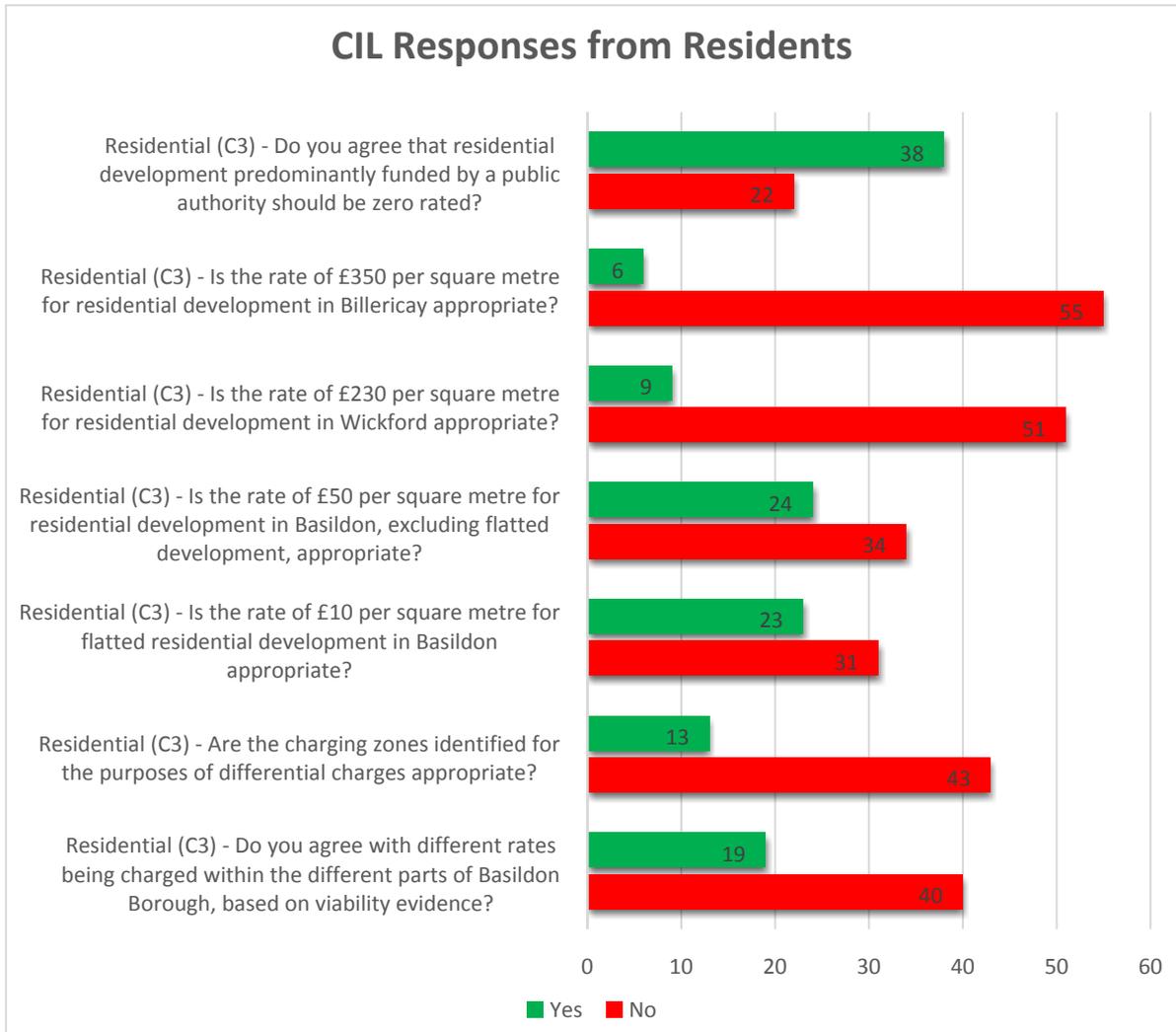
3.5 The main issues raised from the detailed written representations included;

- Developers suggested that the CIL rate proposed to be set for Billericay and Wickford was “exceptionally high and that such excessive CIL rates would impact on the viability of development.”
- Encouragement that the allowance for “Exceptional Relief” be included to provide flexibility to allow development to come forward should this route be appropriate;
- Developers were generally unsure as to what infrastructure projects would be supported by CIL and which would be site specific S106 obligations. They stated that the emerging CIL for Basildon Borough has not yet advanced to the stage where infrastructure provision can be apportioned between the Section 106 and CIL and were therefore unable comment or scrutinise the planned list of infrastructure items and will reserve the right to comment until the CIL Regulation 123 list is published;
- Inconsistencies were cited in the number of housing units allocated for Billericay H17. It was pointed out that in the Revised Publication Local Plan (Oct 2018), H17 is allocated to deliver a collective 1,700 new homes, however the Viability Report Feb 2018 refers to the site as being allocated for 2,000 homes. This difference was considered to have fundamental implications for CIL as the assessment was reliant on a greater supply of housing to support the required infrastructure at South West Billericay;
- There was support for the principle of establishing a CIL;
- It was considered that the definition of what constitutes retirement property is too ambiguous and does not clearly define what would be classed as retirement housing and that which would be standard residential housing;
- Concern on proposing a nominal charge of all development as it was contrary to evidence. The proposed “nominal CIL charge” for all other types of development is not justified by the evidence base and therefore would fail the tests of soundness. The CIL Viability Update Study (February 2018) stated that “All other forms of non-residential floorspace” should be £0 rated (paragraph 6.25 and Table 7.1)

Key Consultation Statistics for Local Residents

3.6 A total of 68 residents or resident groups provided comments during the PDCS consultation. The consultation form invited consultees to provide their views through a series of questions followed by an opportunity to provide more detailed written observations. The responses to the series of questions are summarised in Figure 3.

Figure 3: CIL Responses from Residents



3.7 A total of 55 residents indicated that they are opposed to the rate of £350 for residential development in Billericay; 51 were opposed to the rate of £230 for residential development in Wickford and 34 are opposed to the £50 rate for residential development in Basildon, excluding flatted development.

3.8 The main issues raised from the detailed written representations included:

- The proposed CIL rate in Billericay and Wickford was too high and that the rates should be the same across the borough;

- The high proposed CIL rates in Billericay will be penalising private home owners who want to build or extend their homes;
- The CIL will drive up local house prices as developers will pass on the extra cost through house price increases in order to maintain their profits;
- A large portion of the residents' responses stated that the CIL receipts should be spent in the areas that they are raised and not redistributed. In terms of the proposed CIL rate, residents want to see the majority of the CIL receipts being spent in Billericay as the rates in the area are higher than the rest of the borough;
- Other residents raised concern that the CIL rate being proposed was not high enough and that it will not be able to pay for all the infrastructure requirements for the Borough;
- In terms of CIL rates for retail developments, residents suggested higher rates be used for out of town centre development in order to protect the high street
- Some are against any CIL rate for retail development on the high street.

4. Summary of Main Issues and Responses

- 4.1 This Consultation Statement summarises the main issues raised in consultation under Reg 15 and sets out the Council's considerations. The CIL Regulations do not formally require the preparation of a Consultation Statement at this stage of consultation, but it is considered best practice. A Statement is required following the next stage in accordance with Reg 19 (1, b)³.
- 4.2 The main issues raised together with the considered responses from Basildon Council and Porter Planning Economics (the council's viability consultants) are provided in Appendix A and B.
- 4.3 A schedule of respondents providing a list of comments raised by each consultee are set out in Appendix C and D.

³ <http://www.legislation.gov.uk/uksi/2010/948/regulation/19/made>

5. Next Steps

5.1 The CIL's PDCS represented the first stage of public consultation on the proposed charges. All the representations received will help inform a final CIL Draft Charging Schedule which will be subjected to a further consultation under Regulation 16 of the CIL Regulations 2010 (as amended) prior to submission to the Secretary of State for examination and adoption.

Appendix A: Responses from Residents - Summary of Main Issues

Consultee ID	Summary of Responses	Council's response
PDCS/1	<p>Against development in Billericay and objects to development on Green Belt. Insufficient infrastructure is being proposed.</p>	<p>This comment does not relate to the CIL, rather the Local Plan.</p>
PDCS/3, PDCS/17, PDCS/67	<p>CIL is penalising private home owners who want to build or extend their homes.</p>	<p>CIL can avoid this. Houses, flats, residential annexes and residential extensions which are built by 'self-builders' do not have to pay CIL, where an exemption has been applied for and obtained. Development of less than 100 square metres is also exempt from CIL, unless this is a whole house.</p>
PDCS/4	<p>Is CIL payable for new developments only and not for existing residential properties?</p>	<p>CIL is payable for any development which creates net additional floor space, where the gross internal area of new build is 100 square metres or more. However, houses, flats, residential annexes and residential extensions which are built by 'self-builders' do not have to pay CIL, where an exemption has been applied for and obtained.</p>

Consultee ID	Summary of Responses	Council's response
PDCS/5	The CIL receipts will not be enough to cover the amount of investment needed for infrastructure requirements in the Local Plan.	The Council agrees that the CIL will not fund everything required in terms of infrastructure, but will however have a role in securing funding for a proportion of the infrastructure costs estimated within the Infrastructure Delivery Plan. The Local Plan already identifies that other sources of funding will be necessary including S106 for local and site specific infrastructure requirements, and also from other sources of local and national funding.
PDCS/8	High CIL rates for Billericay will deter development.	The proposed rates have been independently evaluated and are considered to be viable, reflecting the substantial differences in residential sales values across the borough as outlined in the Basildon Borough Local Plan and CIL Viability Report Feb 2018 - Chapter 4 such that the proposed charging rates will not threaten the delivery of the development.
PDCS/10, PDCS/69, PDCS/75, PDCS/91	High CIL rates will reduce the delivery of affordable housing.	Affordable housing is exempt from paying CI. All other policy requirements including affordable housing, S106 etc. were included in the viability testing for the Local Plan and the CIL and are still considered to be viable.
PDCS/14, PDCS/15, PDCS/18, PDCS/19, PDCS/20, PDCS/22, PDCS/23, PDCS/26, PDCS/27, PDCS/29, PDCS/36, PDCS/62, PDCS/64, PDCS/66, PDCS/79, PDCS/90	CIL rates should be the same across the borough.	Setting an equitable rate means the Borough would be unable to benefit from housing market differences. The proposed rates are considered to be viable, reflecting the substantial differences in residential sales values across the borough as outlined in the Basildon Borough Local Plan and CIL Viability Report Feb 2018 - Chapter 4.

Consultee ID	Summary of Responses	Council's response
PDCS/15, PDCS/19	<p>CIL rates should be the same across the borough. Infrastructure in Billericay is insufficient and the majority of the CIL receipts should be spent in Billericay</p>	<p>Setting an equitable rate means the Borough would be unable to benefit from housing market differences. The proposed rates are considered to be viable, reflecting the substantial differences in residential sales values across the borough as outlined in the Basildon Borough Local Plan P and CIL Viability Report Feb 2018 - Chapter 4. Infrastructure requirements across the borough are identified in the Infrastructure Delivery Plan and this will be used to inform the Regulation 123 Infrastructure List.</p>
PDCS/28, PDCS/63	<p>CIL rates should be higher</p>	<p>National Policy requires the council as the Charging Authority to establish the appropriate balance between raising money from CIL to deliver much needed infrastructure to support development in its area and the potential effect on the viability of developments.</p>
PDCS/33	<p>CIL charges for different parts of the borough are politically motivated.</p>	<p>Anticipated infrastructure needs are set out in the Council's Infrastructure Delivery Plan. The impact of charging CIL on development viability was assessed and reported in the Basildon Borough Local Plan and CIL Viability Report Feb 2018. The report established development viability for all types of development. The proposed rates are considered to be viable, reflecting the substantial differences in residential sales values across the borough. Development viability is the only driver for setting the level of the CIL charges. The CIL Regulations do not allow the CIL charges to be politically influenced to direct development to, or away from, particular areas</p>

Consultee ID	Summary of Responses	Council's response
PDCS/35, PDCS/37, PDCS/51, PDCS/52	CIL rates should be spent where they are raised and CIL charges will result in higher house prices.	Anticipated infrastructure needs are set out in the Council's Infrastructure Delivery Plan. As the Council moves closer to adopting a CIL charge, the IDP will be updated and the Regulation 123 infrastructure list will be provided and will undergo consultation in accordance with the national requirements. CIL is part of the development costs and is designed to be set against the land value and should impact on what developers are willing to pay when purchasing land and should not result in higher house prices.
PDCS/39	CIL rates should be the same across the borough and the lower rates in Basildon will mean developers will target building in Basildon and avoid building in Billericay.	National policy requires the Charging Authority to establish the appropriate balance between raising money from CIL to deliver much needed infrastructure to support development in their area and the potential effect on the viability of developments. The proposed rates are considered to be viable, reflecting the substantial differences in residential sales values across the borough as outlined in the Basildon Borough Local Plan and CIL Viability Report Feb 2018 - Chapter 4.
PDCS/44	Billericay's infrastructure is struggling to cope now and will not cope with new development.	This is noted, but the CIL consultation is focussed on how to raise funding from development in order to invest in infrastructure. The judgement as to whether the infrastructure can cope with new development is made as part of the development of the Local Plan.

Consultee ID	Summary of Responses	Council's response
PDCS/47, PDCS/48	<p>The CIL rates should be determined by the need for infrastructure needs in different parts of the borough. All development should contribute to infrastructure.</p>	<p>Anticipated infrastructure needs are set out in the Council's Infrastructure Delivery Plan. The impact of charging CIL on development viability was assessed and reported in the Basildon Borough Local Plan and CIL Viability Report Feb 2018. The report established development viability for all types of development. The proposed rates are considered to be viable, reflecting the substantial differences in residential sales values across the borough.</p>
PDCS/35, PDCS/37, PDCS/51, PDCS/52, PDCS/55, PDCS/91	<p>CIL charges will result in higher house prices.</p>	<p>CIL is designed to be part of the development costs and is designed to be set against the land value and should impact on what developers are willing to pay when purchasing land and should not result in higher house prices.</p>
PDCS/91	<p>The CIL Preliminary Draft Charging Schedule shows more than half of CIL coming from Billericay. In the Draft Plan this has provided a perverse incentive to channel growth towards Billericay, where growth is less sustainable.</p>	<p>The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, including the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions. This will be tested independently in the Examination in Public by the Planning Inspector.</p>

Consultee ID	Summary of Responses	Council's response
PDCS/91	The phasing of payments means that it is unlikely that infrastructure can be delivered first.	The Council will be seeking to phase development to ensure that additional infrastructure capacity is created alongside new development. There are various mechanisms available for securing the investment necessary to deliver infrastructure and these include using planning obligations, CIL and phasing to ensure delivery of infrastructure as set out in the Infrastructure Delivery Plan.
PDCS/3, PDCS/17, PDCS/29, PDCS/32, PDCS/33, PDCS/41	The high street is already under pressure and a CIL charge a nail in the coffin for businesses that are already struggling.	The viability of the CIL rate for new retail has been tested to inform the proposed CIL rate. The £90 CIL rate for retail development will only apply outside town centre boundaries as identified on the Basildon Borough Local Plan Policies Map, with all other retail developments subject to a nominal £10/sqm charge and will therefore have minimal impact on the High Street.
PDCS/18, PDCS/51, PDCS/52, PDCS/56, PDCS/57, PDCS/66, PDCS/77, PDCS/78	Out of town centres need to pay more in order to protect the high street.	Noted. The viability of the CIL rate for new retail has been tested to inform the proposed CIL rate. The £90 CIL rate for retail development will only apply outside town centre boundaries as identified on the Basildon Borough Local Plan Policies Map, with remaining retail charged at £10/sqm.
PDCS/75	Given that online retailing is booming I would dispute the need for any more outside Town Centre development and since road congestion and parking are already problems perhaps it should be higher than £90/m2.	Need is addressed by the Local Plan and not CIL. A CIL rate higher than £90/sqm for Out of Town retail areas is not supported by viability evidence.

Consultee ID	Summary of Responses	Council's response
PDCS/64	<p>Whilst there must be action to make town centres viable the Council should be addressing the real issue.</p>	<p>This is a Local Plan, economic development and regeneration matter.</p>
PDCS/90	<p>The rate of £90 per square metre for out of town retail development is unacceptable as I was not informed of the reason for this CIL. What is the viability evidence for retail development outside town centres? Developers are already being asked to contribute to infrastructure costs through S106 so why do you need a CIL.</p>	<p>The Council has carried out extensive viability appraisal to determine the appropriate contributions that will need to be made by developers and where there might be a funding gap, the Council will need to secure additional funding either through external sources of funding or through the adoption of a Community Infrastructure Levy. This Levy has also been subject to viability appraisal to determine the level of contributions that developers can afford. The results from the testing of non-residential development typologies show that a higher CIL rate on retail schemes in out of town centre locations would be appropriate.</p>
<p>PDCS/6, PDCS/7, PDCS/8, PDCS/17, PDCS/18, PDCS/19, PDCS/20, PDCS/22, PDCS/26, PDCS/27, PDCS/36, PDCS/45, PDCS/47, PDCS/48, PDCS/49, PDCS/51, PDCS/52, PDCS/55, PDCS58, PDCS/60, PDCS/62, PDCS/63, PDCS/64, PDCS/66, PDCS/69, PDCS/78, PDCS/90</p>	<p>The CIL rate for retirement homes should be the same across the entire Borough, there is no justification for applying a charge only in Billericay</p>	<p>The CIL rate for retirement homes is being proposed in Billericay only as land values are higher and can be viably absorbed as part of the development cost. The proposed rates are considered to be viable, reflecting the substantial differences in sales values across the borough as outlined in the Basildon Borough Local Plan and CIL Viability Report Feb 2018 - Chapter 4.</p>

Consultee ID	Summary of Responses	Council's response
PDCS/3, PDCS/33, PDCS/72, PDCS/75	These costs will just be passed on to by developers and will drive up the price of retirement homes.	CIL is part of the development costs and is designed to be set against the land value, meaning it might impact on what developers are willing to pay when purchasing sites, but should not result in higher prices for retirement homes.
PDCS/29, PDCS/54	There is no precise definition of what Other Types of Development are covered. Presumably this in all non-residential. Development of Medical and School buildings should be exempt. But Hotels and Warehouses etc. should pay a higher levy.	Noted. Greater clarification can be provided in the final CIL schedule.

Appendix B: Responses from Organisations - Summary of Main Issues

Consultee	Page/ para no.	Summary of Response	Council's Response
Barton Wilmore on Barratt David Wilson	Para 2.2	Suggest that the Billericay rates are <i>“exceptionally high and considerable (sic) higher than other areas within Basildon Borough administrative area”</i> and that <i>“such excessive CIL rates could stifle the viability of development.”</i>	Noted. The type of site likely to come forward in Billericay have been subject to viability testing to inform the proposed CIL rate.
Barton Wilmore on Barratt David Wilson	Para 2.6 to Para 2.12	Cites numerous s106 contributions based on the IDP for surface water management, healthcare, primary and early year's education which sum to £490,000 in total (equivalent to £2,579 per unit).	<p>PPE (the council's viability consultants) have a general assumption of a minimum s106 cost of £3,230 per unit on all units. The PPE Feb 2018 report para 5.53 explains that this is based on previously achieved rates at £2,230 per unit plus an additional £1,000 per unit for the RAMS requirement.</p> <p>The s106 costs highlighted by Barton Wilmore (£2,579) are not significantly different to the ones assumed by PPE (£2,230). The CIL rate includes a significant buffer for Billericay typologies; significant enough to cover this relatively small difference in s106 assumption.</p>
Barton Wilmore on Barratt David Wilson	Para 2.13	They also note that a CIL rate of £350 per sqm for 190 dwellings, 80m ² per dwelling (15,200m ² floorspace in total)	This calculation is not wholly correct, as in practice some of the total floorspace would be affordable and therefore not liable for CIL.

Consultee	Page/ para no.	Summary of Response	Council's Response
		<p><i>"would require a £5,320,000 CIL contribution".</i></p>	<p>Based on the Local Plan policy requirements 31% of the units would be affordable (15,200m² minus 31% equals 10,488m²), so the CIL contributions for this example would be nearer £3,670,800.</p>
<p>Barton Wilmore on Barratt David Wilson</p>	<p>Para 2.15</p>	<p>Urges that the allowance for "Exceptional Relief" is included to provide flexibility to allow development to come forward should this route be appropriate.</p>	<p>Noted. This can be given further consideration as part of CIL's revision.</p>
<p>Barton Wilmore on Barratt David Wilson</p>	<p>Para 3.5</p>	<p>Suggests that the evidence base does not accord with the requirements set out in National Planning Guidance which outlines a requirement for a transparent and sufficient evidence base.</p>	<p>Disagree. PPE's viability reports provide considerable detail as to how assumptions for the appraisals has been derived. This includes minutes of a developer workshop in Appendix 2, a record of each new-build transactions used to inform sales values in Appendix 3, and details on non-commercial uses and land values in Appendix 4 and 5 respectively. Similar work by PPE and others have been found sound across numerous CIL Examinations.</p>
<p>Barton Wilmore on Barratt David Wilson</p>	<p>Para 3.6</p>	<p>The land values in PPE Feb 2018 report and Appendix 5 are unclear about how the land values adopted for Billericay tie-back to the transactions.</p>	<p>Disagree. The explanation on identifying suitable land values used in the testing is set out in the PPE Feb 2018 Report paras 5.70 to 5.76.</p>
<p>Barton Wilmore on Barratt David Wilson</p>	<p>Para 3.7</p>	<p>Concludes that the proposed levy rates has not been sufficiently tested in current market conditions, nor acted transparently in presenting the evidence.</p>	<p>Disagree. Though it is acknowledged that costs and values are often not likely to always remain static, viability assessments for plan-making purposes can only be made at specific point in time, particularly as CIL Guidance requires the use of current costs and values at the time of the study. In this regard, the evidence base is one year old and it is not considered</p>

Consultee	Page/ para no.	Summary of Response	Council's Response
			that there has been significant changes in the development market that would have made these findings irrelevant since its date of publish.
BNP Paribas	Point 1	<p>Market Housing</p> <ul style="list-style-type: none"> • Expect flats to be a higher value than houses • Note that values are from Jan 14 to June 16 and indexed to November 2017. They question why more figures from between June 2016 to November 2017 are not included • Question whether the borough wide Land Registry Index is appropriate to index values, given the price differences in the borough • They have reviewed the sales values used by PPE and BNP Paribas present four properties that transacted in 2017 and 2018 to compare against the indexed value to find a difference. 	<p>The evidenced on sales values informing the CIL viability testing is based on more than 600 residential new build transactions (each is listed PPE Feb 2018 Appendix 3), which is a substantial sample. It is within this data that the pattern of flats being valued lower than housing in Wickford.</p> <p>Indexation of house prices using Land Registry HPI is a commonly used method for these types of assessments.</p> <p>The sample used by PPE is for new-builds only to reflect the sales values that would be relevant to this appraisal. BNP Paribas's comparing with subsequently transacted units are based on second-hand values. It is common that new homes attract a premium over second-hand properties, and therefore this isn't comparing like-for-like.</p>

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BNP Paribas	Point 2	<p>PPE has adopted a cost of 10% for external works and BNP Paribas expect 15% to be appropriate.</p> <p>Notes that 15% has been used for commercial viability, it is not clear why this cost is not consistent between residential and commercial testing.</p>	<p>The PPE Feb 2018 Report's Appendix 2 shows that this figure was presented at a workshop with local developers, with no or little feedback given that this was inappropriate. We would be happy to consider any appropriate examples indicating that 15% figure is more appropriate. Otherwise, 10% is a commonly used industry standard and has been presented and found acceptable at many other CIL examinations.</p> <p>Commercial development and residential development do not necessarily require consistent approaches to assumptions, given the different nature of these two uses. For instance, commercial uses may have greater costs involved for parking provision or landscaping.</p>
BNP Paribas	Point 3	<p>PPE adopt a cost for contingency of 4%, we would expect a cost of 5%.</p>	<p>From PPE's experience, contingency is generally found to be included at between 3% to 6% for site appraisals, and 4% is a mid-figure. Also, PPE Feb 2018 Report Appendix 2 shows that a figure of 4% was presented at a workshop with local developers, and there was no or little feedback given to suggest that this was inappropriate.</p> <p>Also, for area-wide studies like the PPE Feb 2018 Report, where costs may be less than the average, then it might be acceptable for no contingency to be required. Nevertheless, 4% is a commonly used figure for studies of these type and is a figure that has been presented and found sound at other CIL examinations.</p>

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BNP Paribas	Point 4	<p>PPE adopt a professional fee cost of 8% of construction costs, but consider 10%-12% would be more appropriate.</p> <p>10% has been used for commercial viability, it is not clear why this cost is not consistent between residential and commercial testing</p>	<p>This figure for residential uses reflects an average across a range. For the larger sites involving national housebuilders, the professional fees can be much lower (c.5-6%) due to economies of scale. Also, PBA Feb 2018 Report Appendix 2 shows that this figure was presented at a workshop with local developers, with little feedback given that this was inappropriate. However, if BNP Paribas would like to provide examples indicating that a 10-12% figure is more appropriate then these shall be considered if supplied as part of the CIL's development.</p> <p>Again, it is contested that commercial development and residential development do not necessarily require consistent approaches to assumptions. For instance, it is PPE's experience that commercial uses may incur higher costs involved with designing a scheme than residential.</p>
BNP Paribas	Point 5	PPE appraisals do not include a sales legal fee for affordable housing – this should be included in their assessment.	Noted. This will be re-considered through any updating of the viability testing and updated as part of the CIL's development.
BNP Paribas	Point 6	PPE has adopted a finance rate of 6.5% for residential, whilst they have adopted a rate of 7% for commercial. It is not clear why this cost is not consistent between residential and commercial testing. They would typically expect a cost of 7%.	<p>Commercial schemes tend to carry less certainty than residential sales in terms of values and speed of sale, so banks will normally require more finance return on commercial development than residential development for such higher risks.</p> <p>Finance rates of 6.5% is generally higher than applied in most other CIL studies at this current time of low interest rates.</p>

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			<p>Again, any examples provided as to why a 7% rate would be more appropriate shall be considered if supplied as part of the CIL's development...</p>
BNP Paribas	Point 7	<p>Methodology & timing</p> <ul style="list-style-type: none"> • They consider that a suitable lead-in time for pre-construction before construction commences (suggest 6 months) • A sales lag of 6 months is unreasonable, this should be a minimum of 12 months. • It is unclear why the model assumes that the site (H18 (<i>sic</i>) SW Billericay) is acquired over a 75 month duration in Jan 2017 to May 2023 as the RLV should reflect site acquisition in Jan 2017 and continue across the entire development. Consequently, the model stops applying finance costs to the RLV 	<p>The cashflow is appropriately straight-line for high-level area-wide viability studies such as that required for testing and setting CIL.</p> <p>From PPE's experience, the payment for land is realised through different phases within a scheme and does not all happen on day one.</p> <p>Likewise, the preparation of the site and associated site costs, will incur through the life of the scheme, and therefore should not be expected to wholly occur within an initial phase. Therefore a straight lined over the first half period is appropriate for this type of area-wide study.</p>

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		<p>long before the scheme has returned a positive cashflow.</p>	
CEG	Para 1.5	<p>The CIL Viability Model is underpinned by a range of inputs and assumptions across build, professional fees, finance, profit, planning obligations and value as well as judgements on land threshold. A majority of these are considered reasonable and are not therefore reviewed in this paper, however, the conclusions on planning obligations package, infrastructure costs and issues relating to the provision of open space are potentially overstating project viability and the effect is an erosion of 'post CIL headroom'.</p>	<p>Noted. The impacts of planning obligation and open spaces have been considered and tested in the allowances for policy costs and site costs.</p>
CEG	Para 1.7	<p>The model relies on a BCIS basis for the residential construction. This is an industry standard matrix which is a not unreasonable starting point for a model of this type. However, BCIS does not include any costs external to the buildings not does it include any sort of abnormals such as unusual foundation design.</p> <p>For Externals – “An allowance of 15% would be more reasonable for a site as</p>	<p>Externals have been included in the PBA work – for example, see PBA Report Feb 2018 para 5.35. Similarly, brownfield costs are included, but any abnormal costs are treated as non-standard and therefore should come off the benchmark land value.</p> <p>10% for externals is commonly used. It has been presented and found sound at many other CIL</p>

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		proposed by policy H19 and this adjustment would equate to c.£15k per unit or £5k above the allowance suggested by the CIL Viability Model.”	<p>examinations. Also, depending on scheme, a minimum of £5,000 on each residential plot has been included to allow for other site costs not covered by CIL.</p> <p>The PPE Feb 2018 Report Appendix 2 shows that this figure was presented at a workshop with local developers, with little feedback given that this was inappropriate. However, if you would like to provide examples indicating that a 15% figure is more appropriate then these shall be considered as part of the CIL's development.</p>
CEG	Para 1.8	Allowances for site opening-up works on the larger sites should lie in the £20-40k per plot range. On this basis the opening up cost allowance relied upon by the CIL Viability Model is at least £20k per unit less than the current expectation”	<p>PPE's approach to opening-up costs is in para 5.39 & 5.40 for generic sites, and 5.42 for strategic sites. PPE Feb 2018 Report Appendix 2 shows that the figures used for testing general typologies was presented at a workshop with local developers, and there was little feedback given to suggest that these were inappropriate. For strategic sites, this is based on costings by Pell Frischman. We consider this an appropriate basis for the assessment.</p> <p>Any examples provided as to why an allowance of up to £40k per unit (where an adopted CIL is in place) shall be considered as part of the CIL's development.</p>
CEG	Para 1.10	No breakdown is provided on the justification for the £3.25k per plot s106 allowance save to identify this covers	Disagree. PPE Feb 2018 Report para 5.54 to 5.58 notes how s106 is considered. For generic sites, PPE have based s106 assumptions of advice on receipts

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		<p>health, open space, education, community provision and local highway and travel mitigation.”</p> <p>“The S106 burden on strategic sites would not normally be expected to exceed those of sites in the 300-400 units range by upwards of £5k per plot as the headline mitigation requirements will generally be broadly comparable”</p>	<p>from the council. For strategic sites, these are based on the Essex County Council Guide to Development Contributions.</p> <p>Also, further updates to viability testing shall be considered as part of the CIL's development.</p>
CEG	Para 1.12 & Para 1.13	<p>Open space – “draft policy H19 is being required to provide and fund c. 6.5ha of open space over and above the level required to mitigate its own planning impacts”</p> <p>The Rep states that this would be at a cost in excess of £1.5m.</p>	Noted. This will be considered through further updated viability testing and shall be considered as part of the CIL's development.
Countryside Properties	Page 6	Reference is made in the PPE Feb 2018 Report to an element of the costs arising from the relocation of sports pitches from Gardiners Lane South being assigned to the three strategic sites that were tested as part of the PPE report (Gardiners Lane South itself, West Basildon and East Basildon).	This cost in the Pell Frischman's IDP study at £12,962,900 is included in the appraisal of H5 Gardiners Lane, as noted in PPE Feb 2018 Report Table 5.13.

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		It is not clear what level of cost has been applied, nor whether or not the assumed cost has firstly been discounted to take account of revenue to be generated by the redevelopment of the Gardiners Lane site itself.	
Countryside Properties	Page 7	Any shortfall in funding for the relocation of the Gardiners Lane South sports pitches should be met through CIL funding.	Noted.
Gleeson and Avant	Page 6	<p>Concerned about the evidence for the £2,330 per unit S106 cost, originally discussed in the 2015 PBA Report, which is viewed to be out of date and did not properly explain or justify that figure, and despite relying on its evidence for s106, it is no longer appearing on the Council's evidence base (which it should do if it is still being relied upon).</p> <p>Also, the average s106 on larger schemes would be higher than the figures tested.</p>	Noted. The PDCS was informed by the PPE Feb 2018 Report. This will be considered through further updated viability testing and shall be considered as part of the CIL's development.
Gerald Eve for Gleeson, Redrow, Scott Properties	Page 2	Definition of what constitutes retirement property is ambiguous and does not clearly define what would be classed as retirement housing and that which would be standard residential housing.	Applies to retirement/assisted living accommodation within the Use Class C3 with planning permission. This definition has been adopted by several local authorities with a CIL in place.

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and Taylor Wimpey			
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Page 4	PBA 2015 Report and Pell Frischmann's Basildon Borough High Level Development Framework Preliminary Abnormal Infrastructure Report (2017) are used for evidence which is not available on the Council's website, resulting in the assessment lacking transparency.	Noted.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Page 4	All the appraisals must be made available to the public for scrutiny before the CIL rate can be demonstrated as reasonable.	The appraisal for each strategic site has been published, as has an example for a generic typology shown in the PPE 2018 Report Appendix 1. It should be noted that in line with guidance for testing for CIL avoiding too much detail, there is no benefit to be gained from publishing the full appraisals for every generic site typology. The outputs will always match the inputs, so it is only important that the method and the assumption (inputs) informing the results are presented and reviewed.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 7	The proposed cash-flow shown in the PPE Feb 2018 report example appraisal for South West Billericay is incorrect because it assumes houses are sold on the same date that land is purchased, and the infrastructure works are undertaken; and construction of the properties commence, which results in the appraisal being more viable than is possible.	The example for H17 South West Billericay in the PPE Feb 2018 report correctly reports sales values to start in Jul'17, which lags the Jan'17 tested date for the site purchase, build costs and the commencement of other site works by 6 months. This is the correct approach to use.

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Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Page 7	PPE were unsure in their assessment as to what infrastructure projects would be supported by CIL and which would be site specific obligations.	This evidence is emerging as the CIL rate progresses through to Examination. If there are any significant differences in how infrastructure is funded that affect the CIL rates, then this will be tested and addressed.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.4-2.8	The NPPF and NPG governing viability and policy setting was updated in Summer 2018, whilst the PPE February 2018 report was prior to this date and the draft consultation document was published in November 2017. PPE has not made any reference or confirmation in their Addendum September 2018 that the evidence base underpinning the PDCS remains appropriate.	The PPE Reports in Feb 2018 and the PBA Report in 2015 do remain relevant to, and in compliance with, the new NPPF and revised PPG.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.10	PPE February 2018 report is not clear; and does not provide a transparent opportunity for interpretation or interrogation by the Council or by Stakeholders.	While comments noted in the PDCS consultation will be considered, we would disagree that the PBA and PPE reports do not remain clear since these follow reporting templates that have been examined and found sound at previous CIL hearings that have been drawn on to guide this work.
Gerald Eve for Gleeson, Redrow, Scott Properties	Para 2.12-2.15	The PPE Feb 18 study references to Housing Allocations in the emerging Local Plan is not consistent. No attempt has been made in the September Addendum to address this confusing issue.	The CIL study was undertaken during work on the emerging Local Plan, hence difference in references, however the name reference is not considered to be a significant problem of relevance to informing the PDCS CIL charge, and any changes in site details are

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and Taylor Wimpey			being considered through further testing to ensure that the PDCS CIL rates remain affordable.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.167	H17 in the DLP (Oct 2018) is allocated to deliver a collective 1,700 new homes, however the PPE Feb 2018 Study refers to H28 (albeit H18) (page 24) the site, being allocated for 2,000 homes. This difference has fundamental implications for CIL as the assessment is reliant on an over-supply of housing to support the required infrastructure at South West Billericay.	Noted. This will be addressed through any further updated viability testing of the strategic sites as part of the CIL's development.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.23	The PPE Feb 2018 Study provides only a single example viability appraisal for Billericay to support its evidence base; being H18 South West Billericay. Several tables within the report show 44 different typology tests undertaken within Basildon, yet South West Billericay is the only site within Billericay that any actual evidence of an appraisal is provided.	Disagree, as shown in PPE Feb 2018 Report Table 6.1, ten site typologies in Billericay and the South West Billericay site informed the proposed CIL PDCS. The presentation of each full appraisal is unnecessary. It should be noted that in line with guidance for testing for CIL avoiding too much detail, there is no benefit to be gained from publishing the full appraisals for every generic site typology. The outputs will always match the inputs, so it is only important that the method and the assumption (inputs) informing the results are presented and reviewed.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.26-28	Difference in CIL rates between strategic sites.	This reflects known and tested costs. This will be considered through further updated viability testing of the strategic sites as part of the CIL's development...

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Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.29-2.32	PPE not used up-to-date relevant sales evidence to confirm their 2015 indexed data set is accurate and robust for the exercise.	Average sales values do fluctuate on a continual basis and indeed the values now are higher than when the viability study was undertaken in Feb 2018. It would be impractical to re-run the appraisals on a monthly basis. Instead, when reviewing the viability work, PPE have used the Land Registry Housing Price Index, which is recognised as a reliable source of house price changes, and is based on values of all residential transactions within Basildon Borough. PPE have also allowed for a significant buffer to accommodate such fluctuations. However, we would welcome any evidence about why these figures are wrong as part of the CIL's development.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.33	Appraisal of H18 South West Billericay in PPE Feb 2018 Appendix 1 use different sales values to those proposed for H18 South West Billericay in the text of the report.	Noted. The PPE Feb 2018 Report Table 5.5 has a typo and instead of £4,700 for Billericay should say £4,500 since all Billericay typologies and site H18 have been tested with a sales value at this lower value. This will be corrected as part of the CIL's development.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.34-2.36	The developable area (net) that has been applied in the assessment of H18 South West Billericay differs to that proposed in policy H17 of the Draft Local Plan (Oct 2018) or the PPE text. Also, none of the 11 Billericay typologies is tested with the Draft Local Plan 35dph in Billericay and H18 South West Billericay is tested at 41duph.	The Billericay typologies (excluding the 150 unit flatted scheme) have slightly different densities to reflect the housing mix and site sizes, but overall average to 35dph as required in the Draft Local Plan. The site area for H18 South West Billericay will be amended through further updated viability testing of the strategic sites based on the changes in the Local Plan and updated as part of the CIL's development.

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Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.37	The proposed build costs and sales data do not reflect the same period.	The latest available data at the time of the work was used. So, sales values were averaged to Nov '17 HPI values (the latest available) and the BCIS costs were slightly more recent at 2018Q1, which is a similar up to date time period for the purposes of testing CIL.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.39	Further clarity is required to exactly which BCIS data set has been relied upon and how this has been adjusted to reflect the mix of housing types and well as houses and flats for each typology. Sensibly the key stakeholder groups for H18 South West Billericay would be involved in the discussion regarding build costs and where these are likely to be.	See PPE Feb 2018 Report para 5.33 for explanation about how average build costs using BCIS was derived. Also, site promoters were contacted and consulted through phone interviews and the developer workshops.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.41-42	PPE applied lower opening-up costs to larger strategic sites than those applied to other typologies.	The PPE Feb 2018 Report used more detailed information for the strategic sites, and consulted the site promoters about these costs and no additional information was forthcoming. Therefore, the assumptions used, which include more than £20m tested against H18, were appropriate at that time. This will be re-considered again through any updating of the viability testing and updated as part of the CIL's development.
Gerald Eve for Gleeson, Redrow, Scott	Para 2.44	The proposed assumptions for residential development and commercial elements do not appear to be consistent. There is no explanation	Disagree. PPE consider that proportionally adequate explanation regarding assumptions for residential and non-residential testing has been provided in line with guidance for testing and setting CIL.

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Properties and Taylor Wimpey		as to why financing, professional fees and externals would be different between commercial and residential development. Furthermore, there is no explanation as to how these differences could be represented in appraisals which include both non-residential and residential elements.	
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.50-54	The tested viability model appears to be relatively crude in its application of cash-flow.	Disagree. PPE consider that proportionally adequate cash-flow has been used that is in line with the level of detailed expected in guidance for testing and setting CIL. The approaches have been tested and found sound at numerous CIL Examinations.
Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey	Para 2.55-56	H18 South West Billericay is the only test identified in table 6.1 to see an increase in CIL when additional policy costs are applied.	At the tested Policy Layer 5 there is an expectation that 10% of the dwellings are identified for specialist retirement accommodation, as noted in the PPE Feb 2018 Report para 5.65. The impact of this policy was positive on H18 due to the high value offered by specialist retirement housing in and around Billericay.
Highways England		<p>Some concerns relating to congestion of certain road networks in the Borough.</p> <p>Some commentary on the use of s278 and s106</p>	Noted. This is a matter for the Local Plan, not the CIL.

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ICENI	Page 4	Notes that the emerging CIL for Basildon has not yet advanced to the stage where infrastructure provision has been apportioned between the Section 106 and CIL routes. As such ICENI reserve their position to comment on the planned list of infrastructure items when the CIL Section 123 list is published.	Noted.
Persimmon Homes	Page 1	Concerned that the IDP and other evidence supporting the draft Local Plan and the CIL work provide little detail regarding what, where, when and how infrastructure will be funded.	Noted. As the Council move closer to adopting a CIL charge, the IDP and Regulation 123 list will be provided in accordance with the requirement of national policy for adopting a CIL.
Persimmon Homes	Page 2	Considers that the potential cost of the Recreation Avoidance and Mitigation Strategy (RAMS) has not been fully considered in the 'Basildon Local Plan and CIL Viability Update Study' (Feb 2018)"	Disagree. A £1,000 per unit for both generic and strategic costs towards the RAMS has been assumed within the appraisal, as noted in PPE Feb 2018 Report para 5.53.
Persimmon Homes	Page 2	Notes that "The cost assumed for school places (p52 'Basildon Local Plan and CIL Viability Update Study') are derived from 2016 costs which do not include indexation which ECC applies from the baseline date. It is also understood from ECC that these figures for school places are being revised upwards."	Noted. This will be re-considered again through any updating of the viability testing and updated as part of the CIL's development.

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Persimmon Homes	Page 2	Suggests that the 'Basildon Local Plan and CIL Viability Update Study' does not appear to include costs of Local Plan Policy requirements including; Electric charging points o DES5 High Quality Landscaping and Public Realm Design o Costs associated with the delivery of infrastructure identified in the IDP (It is unclear what comprise the infrastructure funded by CIL in the absence of a 123 list and what falls to s106)."	Disagree. These utilities, landscaping and public realm costs are within assumptions of 10% of build cost plot externals, plus the tested greenfield site opening-up costs ranging between £5,000 to £17,000 per unit as noted in PPE Feb 2018 Report Table 5.9.
Persimmon Homes	Page 2	Suggests that for the majority of the strategic sites the s106 costs are likely to be far in excess of the £3,230 per dwelling given that they are being asked to forward-fund major infrastructure.	The s106 on strategic sites have been tested at rates higher than this as shown in the PPE Feb 2018 Report Table 5.11 and Sept 2018 Addendum. This will be re-considered again through any updating of the viability testing and updated as part of the CIL's development.
Persimmon Homes	Page 3	Suggests that strategic sites often have a different 'risk profile' as they often span economic cycles, bear heavier infrastructure burdens and have significant on-costs. This does not appear to be modelled.	Disagree. Larger sites are tested with opening up costs at £17,000 per unit as noted in PPE Feb 2018 Report Table 5.9, in addition to specific strategic infrastructure costs for strategic sites reported in Table 5.11.
Persimmon Homes	Page 3	There has to be clearer justification for differentiation in CIL rates.	There is justification based on substantial differences in residential sales values across the borough. This is noted in PPE Feb 2018 Report Chapter 4.

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Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey		We have not looked to challenge retail, but we would expect this rate to reviewed as part of any evidence update as part of the further stages of the CIL charging process.	Noted. This will be re-considered through any updating of the viability testing and updated as part of the CIL's development.
Sport England		An objection is made to the proposal for 'all other uses' to be charged a £10 per square metre CIL rate as it has been assumed that this will include sport and leisure uses. As set out on page 7 of Sport England's established Forward Planning guidance https://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/ in order to promote investment in sport and ensure sporting development is viable, CIL charging schedules should have a nil rate for sport and recreation uses.	Noted. This will be re-considered through any updating of the viability testing and updated as part of the CIL's development.
St Modwen, Gerald Eve for Gleeson, Redrow, Scott Properties and Taylor Wimpey		The proposed "nominal CIL charge" for all other types of development is not justified by the evidence base and therefore fails the tests of soundness. Even a "nominal" charge could have significant implications for development viability on their proposed site.	Noted

