Purbeck Community Infrastructure Levy Charging Schedule

Examination

PURBECK DISTRICT COUNCIL RESPONSE TO FURTHER QUESTIONS FROM THE EXAMINER

Question 1(i)
The Examiner has asked the following question regarding the size of the funding gap
It would be helpful for the Council to indicate both the size of the anticipated funding gap over the plan period and the expected yield from CIL

Council's Response

To summarise the information in our response to question 1.5 in Matter 1, the Council has identified:

Known infrastructure cost	£30,458,126
minus	
Current unspent S106 contributions (income)	£2,538,754
minus	
Anticipated funding (income)	£2,470,000
equals	
Infrastructure funding gap	**£25,449,372**

The Council expects CIL to generate £6.1M by 2027, which covers only 24% of the funding gap. Please see the Council's response to Question 1.5 in Matter 1 for further details.

Question 2
The Examiner has made the following statement on transparency
Concern is expressed in a number of representations that the CIL Development Viability Assessment Final Report (February 2013) lacks transparency, so that it is

difficult to assess whether or not an accurate assessment of viability has been concluded. The principal specific concerns are outlined below.

Council's Response

The approach is that accepted and adopted in over 100 local authority viability studies across England and Wales. The approach adopted has in each case, been subjected to rigorous scrutiny at a developer and landowner workshop and the best available data sources utilised as agreed with participants at these workshops.

Question 3(i)
The Examiner has asked the following question on the residual value
In order to take account of the need, as set out in the Framework (paragraph 173), for LPA's to take account of a 'competitive return' to a willing land owner and to avoid assuming that land will come forward at the margins of viability, a 'viability cushion' needs to be incorporated in the testing (a point that is also made in the Harman Report). Is there a viability cushion included within the relevant viability calculations, and if so, what is the percentage or range of percentages that are included in the calculations?

Council's Response

The Council has set the CIL and affordable housing policies based upon providing landowners with a competitive return. The question of an acceptable and competitive landowner return is difficult to define, particularly where contributors to a key workshop at the outset of the CIL rate setting process were not forthcoming with information. Much depends on the planning process itself and its impact on landowner decision making. It is very clear however, that returns to landowners are very significant in Purbeck. Table 3.3 (based on the original analysis) of the report shows how huge these returns actually are:

Table 3.3 Results of the viability testing – residual value £m per hectare

2 Units						8 Units					
	0%	20%	30%	40%	50%		0%	20%	30%	40%	50%
The Coast	£5.58	£4.42	£3.85	£3.29	£2.71	The Coast	£4.76	£3.70	£3.29	£2.62	£2.08
Swanage	£4.96	£3.91	£3.39	£2.87	£2.34	Swanage	£4.27	£3.28	£2.78	£2.28	£1.78
Purbeck Rural Fringe	£3.80	£2.97	£2.52	£2.10	N/A	Purbeck Rural Fringe	£3.33	£2.48	£2.06	£1.64	N/A
Wareham	£3.23	£2.46	£2.06	£1.68	N/A	Wareham	£2.02	£2.03	£1.64	£1.25	N/A
Purbeck Rural Centre	£2.20	£1.58	£1.27	£0.98	N/A	Purbeck Rural Centre	£1.93	£1.31	£0.99	£0.68	N/A
Upton	£1.59	£1.07	£0.81	£0.55	N/A	Upton	£1.44	£0.89	£0.62	£0.34	N/A
3 Units						12 Units					
	0%	20%	30%	40%	50%						
The Coast	£4.46	£3.51	£3.04	£2.56	£2.09	The Coast	£5.25	£4.06	£3.61	£2.86	£2.27
Swanage	£3.96	£3.10	£2.66	£2.21	£1.78	Swanage	£4.70	£3.59	£3.04	£2.49	£1.94
Purbeck Rural Fringe	£3.07	£2.33	£1.97	£1.60	N/A	Purbeck Rural Fringe	£3.67	£2.74	£2.26	£1.78	N/A
Wareham	£2.57	£1.92	£1.59	£1.26	N/A	Wareham	£2.21	£2.21	£1.78	£1.36	N/A
Purbeck Rural Centre	£1.70	£1.20	£0.94	£0.68	N/A	Purbeck Rural Centre	£2.11	£1.41	£1.07	£0.72	N/A
Upton	£1.21	£0.77	£0.56	£0.32	N/A	Upton	£1.58	£0.96	£0.66	£0.35	N/A
5 Units						15 Units					
	0%	20%	30%	40%	50%		0%	20%	30%	40%	50%
The Coast	£5.22	£4.09	£3.52	£2.93	£2.37	The Coast	£6.12	£4.75	£4.26	£3.38	£2.69
Swanage	£4.30	£3.30	£2.81	£2.30	£1.80	Swanage	£5.47	£4.20	£3.59	£2.95	£2.30
Purbeck Rural Fringe	£3.36	£2.51	£2.08	£1.67	N/A	Purbeck Rural Fringe	£4.27	£3.19	£2.65	£2.11	N/A
Wareham	£2.79	£2.04	£1.66	£1.27	N/A	Wareham	£3.56	£2.58	£2.11	£1.62	N/A
Purbeck Rural Centre	£1.93	£1.31	£0.99	£0.68	N/A	Purbeck Rural Centre	£2.45	£1.66	£1.26	£0.86	N/A
Upton	£1.41	£0.87	£0.60	£0.32	N/A	Upton	£1.79	£1.11	£0.77	£0.41	N/A

In the case of a 15 unit scheme (or 15 units as part of a larger schemes, where the economics might be stronger), the following landowner returns result for a greenfield site:

The Coast (50% Affordable Housing)	180 fold return;
Swanage (50% Affordable Housing)	153 fold return
Rural Fringe (40% Affordable Housing)	140 fold return;
Wareham (40% Affordable Housing)	108 fold return;
Rural Centre (40% Affordable Housing)	57 fold return;
Upton (40% Affordable Housing)	27 fold return

These are massive windfall returns. These should be no question as to whether the returns are competitive. There are virtually no other investments which would give such huge returns in such a short space of time.

Department for Communities and Local Government study on *The Cumulative Impact of Policy Requirements* (2011) sets benchmarks of £100,000 to £150,000 per gross acre (£247,000 to £370,500 per gross hectare) for greenfield sites.

On the basis of a benchmark of say £300,000 per hectare, CIL could be set as follows taking the affordable housing policy into account:

Submarket	Possible rate using £300k benchmark	Council set CIL rates
The Coast (50% Affordable Housing)	£1,707sqm	£180sqm
Swanage (50% Affordable Housing)	£1,429sqm	£180sqm
Rural Fringe (40% Affordable Housing)	£1,616sqm	£100sqm
Wareham (40% Affordable Housing)	£1,179sqm	£100sqm
Rural Centre (40% Affordable Housing)	£500sqm	£30sqm
Upton (40% Affordable Housing)	£98sqm	£30sqm

This illustrates that the Council is allowing for much more competitive returns form landowners than benchmark levels.

Question 3(ii)

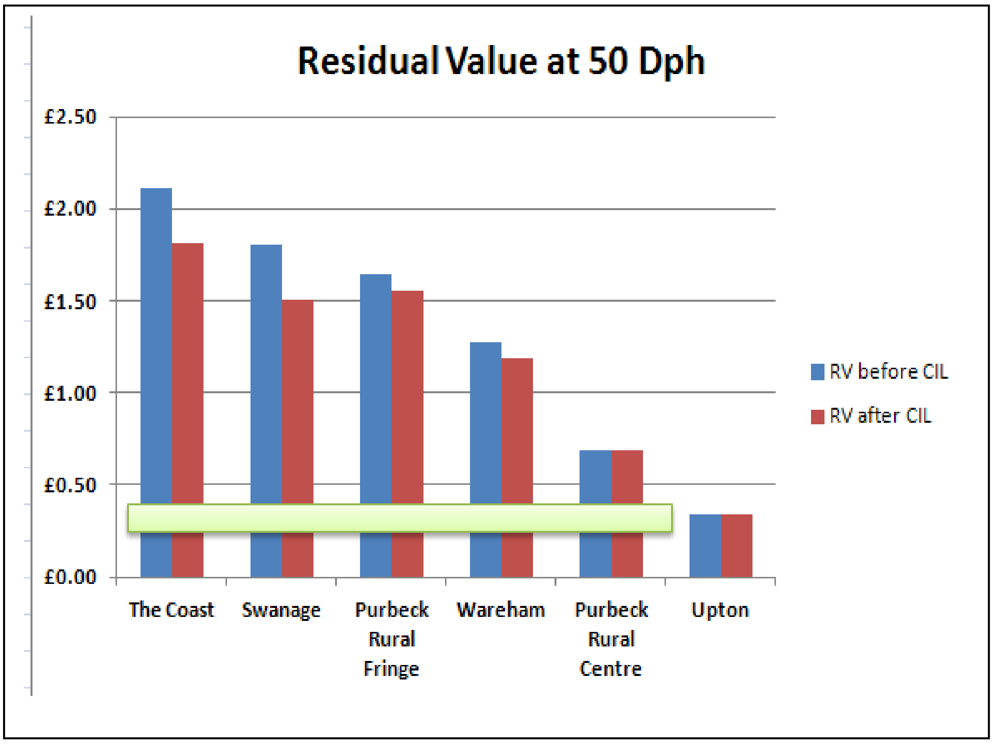
The Examiner has asked the following question on the residual values

Concern is expressed that there is little reference to local benchmarks, especially for non-urban sites or urban extensions (which are relevant in Purbeck), taking into account local partner views on market data and information on typical minimum price provisions for local sites; and that if such benchmarks are disregarded, there is an increasing risk that land will not be released and the assumptions upon which the CIL is based may not be found sound. The testing analysis/assumptions referred to in the CIL Development Viability Assessment Final Report (February 2013) appear to be theoretical rather than based on specific benchmarks. It would helpful if the Council could clarify this. If the data is theoretical, it would be helpful to obtain a few local market benchmarks to avoid the risks identified above.

Council's Response

The question of establishing local benchmarks is difficult, particularly where contributors to the initial workshop were not forthcoming with information. The best we can do is use national figures. As set out in the Council's response to 3(i), recent research by the Department for Communities and Local Government study on The Cumulative Impact of Policy Requirements (2011) suggests land value benchmarks for housing of £100,000 to £150,000 per gross acre (£247,000 to £370,500 per hectare).

We present below a chart showing residual values per hectare for the range of sub markets. These relate to a 90% social rented, 10% intermediate housing split for housing tenure (the above analysis in 3(i) relates to 75%:25% split) The residual values reflect the affordable housing policy position; i.e. 50% in the top two markets and 40% elsewhere. The light green bar represents a broad brush (DCLG) definition of minimum viability.



The chart makes very clear the large buffer that has been built into the CIL Charging Schedule with respect to all sub markets, but most particularly the mid to higher value ones.

The light green bar represents a broad brush definition of viability (DCLG The Cumulative Impact of Policy Requirements (2011) .

We accept that in some instances (most notably Upton) viability will be challenging in the short term economic conditions. We believe that we have set CIL at an appropriate level, taking into account the modifications we have made, e.g. to reduce the rate in Upton and Purbeck Rural Centre to £30 per square metre from £40 per square metre.

Question 3(iii)
The Examiner has asked the following question on the residual values
Concern is expressed that there is no confirmation or reasoned evidence to indicate whether the resultant residual land values are acceptable or unacceptable in the locality. Clarification is required from the Council on this point.

Council's Response

We have addressed the point in 3 (ii) above.

Question 3(iv)
The Examiner has asked the following question on residual values.
Concern is expressed that the proposed rate of CIL does not sufficiently cater for the lower value areas of the District.

Council's Response

The Council recognises that current viability in the Upton submarket is tighter than elsewhere in the District and that is why it recommended lowering the CIL rate to £30 for residential development as set out in the Statement of Modifications (SD04). It is important to ensure that new housing development in this sub-market does pay some CIL to at the very least cover some of its essential heathland mitigation. For example a 3 bed house under current Section 106 arrangements pays a contribution of £1,500. CIL for an open market 3 bed house in Upton and the Purbeck Rural Centre submarkets would pay £2,400. It is important to remember that affordable housing is not liable to a CIL levy, but has to be mitigated for, so has to be paid for from the market dwellings.

Question 4(i)
The Examiner has asked the following question on build costs
Concern is expressed that the BCIS costs are only basic build costs, with no inclusion of a wide range of other relevant costs, e.g. SUDS, highways improvements, etc, and that the 15% regional allowance may or may not include these factors. Council evidence to substantiate this would be helpful.

Council's Response

The approach used here is consistent with over 100 similar viability studies across England and Wales. The method has been tested ad infinitum. The costs include all the items queried above. The costs reflect local circumstances. The beauty of the BCIS is that it can do this.

Question 4(ii)
The Examiner has asked the following question on build costs
The build costs used in the viability assessments are for Code for Sustainable Homes (CfSH) Level 3 only, so the costs of implementing the Government's Zero Carbon Homes Agenda are specifically excluded (see DCLG Cost of Building to CfSH Updated Costs Review 2011, which shows that the costs of building to Code 5 increases build costs by 28-31%) This omission is inconsistent with Local Plan policy D (which specifically refers to achieving Lifetime Homes standards). Is policy D aspirational, or should the CIL take this policy on board?

Council's Response

It is uncertain why the Council are being asked here to test a worst case scenario where costs are increased but house prices are not. The test of viability for the purposes of the Plan is a change in the variables affecting both sides of the equation. It is quite likely that these increased costs will be easily absorbed by house price inflation in a location such as Purbeck.

The Community Infrastructure Levy and Development Viability Assessment report (CD33) did assume build costs at the current requirements (Code for Sustainable Homes Level 3). The DCLG report by BCIS in July 2012, Assessing the cost of Lifetime Home Standards, indicates a potential increase in build cost between 0.3% and 3% for an 80sqm 3 bed house. Where building standards are required to be higher than the baseline this should, consistent with other policy development exercises, be considered in the context of changing revenues; i.e. negotiated on a scheme by scheme basis, e.g. the Council has negotiated partial compliance with lifetime homes standards in order to maximise its priority of affordable housing in the Worgret Road settlement extension, referred to in the Council's response to Matter 2.2.

Question 5
The Examiner has asked the following question on other costs
It appears uncertain whether an allowance has been made for site acquisition costs such as land agents' fees, legal fees and stamp duty, whilst sales and marketing costs are set at the lowest percentage of 3% (cf Harman Report's recommendation of 3-5% of gross development value). Clarification is required that the Council has taken these necessary allowances into consideration.

Council's Response

The allowances for other development costs including professional and marketing fees were tested at the Workshops for both the Affordable Housing Viability Study and the CIL Viability Study. The allowances made in both studies reflect feedback.

The allowances more generally are accepted in around 150 Three Dragons' Toolkits running in around 150 local authority areas across England and Wales.

The Harman Report is one of many reports advising on viability. It does not propose a definitive approach to assess viability overall. If it does not deal with this central issue, then a minor deviation from its lucid tones is not to be a matter of concern.

Question 6
The Examiner has asked the following question on affordable housing
It is not clear whether grants are assumed to be available to fund the tenure mix of 90% social/10% intermediate housing, as set out in Local Plan policy AHT. In view of the comment in paragraph 5.3.3 of the Viability Report Update Study (October 2010) that: "with very significant cuts to both grant as well as to housing benefit, we remain unconvinced that the new policy direction can deliver a new model of affordable housing provision", are the proposed CIL rates of £180 for Swanage/The Coast; £100 for Wareham/Purbeck Rural Fringe; and £30 for Upton/Purbeck Rural Central still appropriate and realistic? A clarification or update is required.

Council's Response

The example set out in the Appendix 4 of The Community Infrastructure Levy and Development Viability Assessment report (CD33) sets out in sheet 14 that residual value has been calculated assuming no grant available from the housing corporation. This applies to all schemes tested.

We note that the Inspectors reference to 5.3.3 refers to the second 5.3.3 in the report and should be 5.4.3 (on page 30).

The reference to the government's change in policy approach from social rent to affordable rent has been taken into consideration by Andrew Golland Associates. The Council commissioned Andrew Golland Associates to look at the impact of affordable rent in 2011 (CD 35). Section 4 states

"Our conclusion is that in the main, the Council need not rely to any significant extent on delivering affordable housing via Affordable Rent, since residual values in the majority of areas are very high. In a nutshell, we think that schemes will still come forward where Social Rent makes up the lion's share of the affordable element. However, the fact remains that the new policy direction, particularly when and if supported by grant, provides a significant potential impetus to the viability of housing in the District. The net effect is, in the round, to make schemes more, rather than less viable as assessed in the previous two reports."

With this in mind Andrew Golland Associates set the Council's affordable housing policy and the CIL rates.

Question 7(i)
The Examiner has asked the following question on Section 106 contributions
It would appear from paragraph 3.9 of the Final Report that no S106 allowance has been included, or not in all cases; an appropriate allowance should be included where appropriate.

Council's Response

The only Section106 contributions on CIL liable developments will be for affordable housing. On settlement extensions over 50 dwellings we may also ask for Suitable Alternative Natural Greenspace (SANGs) which will be worked up with the developer through a positive policy approach to ensure scheme viability.

Question 7 (ii) The Examiner has asked the following question on Section 106 contributions
Concern is expressed that some developers are going to be 'hit' twice – by the CIL rate and existing S106 payments. If there would be cases where both payment systems would operate at the same time, clarification from the Council would be helpful.

Council's Response

The Council will cease collecting heathland and transport S106 contributions from CIL liable developments upon implementation of CIL in April 2014. The Council will set out in monitoring reports how CIL is spent (and any other S106). This will ensure a transparent approach with no double counting. The priorities for spending CIL are set out on the Regulation 123 list.

As mentioned in 7(i) above, for developments over 50 dwellings the Council will seek the provision of SANGs through Section 106. In these instances, the CIL paid by that specific scheme will be distributed only to non-heathland mitigation projects to avoid double counting, e.g. on transport instead. This will be set out in monitoring reports.

Question 8(i)
The Examiner has asked the following question on transport
Concern is expressed that additional costs implications, such as those stemming from Local Plan policies IAT and ATS, relating to accessibility and transport, may not be fully accounted for. Clarification is needed from the Council.

Council's Response (prepared jointly with Dorset County Council)

PLP1 Policy ATS implements the Purbeck Transport Strategy, providing the policy hook to collect S106 contributions. PLP1 Policy DEV: Development Contributions explains that these S106 contributions for transport will be replaced by CIL.

There are two types of transport contributions – to make a site acceptable in planning terms (S106 & S278) which will still be required (subject to current government consultation). This is separate to the PTS funding through CIL which is to provide transport needed to support development to mitigate the district wide transport impacts.

Question 8(ii)
The Examiner has asked the following question on transport
Concern is expressed by Dorset County Council that there is a large funding gap, when compared to the current tariff approach, which means that some projects will have to be scaled back. Has the Council identified any other sources of finance to bridge this gap, eg New Homes Bonus, other grants, etc?

Council's Response (prepared jointly with Dorset County Council)

The Council is working with Dorset County Council (DCC) to identify priorities and other forms of funding. Currently the Local Transport Plan provides 10% match funding to development contributions. DCC have also identified £500,000 from the corporate budget towards Purbeck Transport Strategy projects. Where available, DCC will seek other funding sources such as SUSTRANS, LEP (LTB) and LSTF type grants. DCC will also work with parish and town councils to help direct their 15-25% of the CIL income to local transport schemes.

The New Homes Bonus is not sufficient to cover the Council's cut in government grant, so will be used by the Council to run the basic Council services and is not available for infrastructure.

Developers of particularly minerals & employment land will deliver those transport improvements required for the development to go ahead under CIL Reg 122, Section 38 and Section 278 agreements. The phasing of development will determine the delivery of infrastructure or the payment of contributions towards its delivery. The Council will work closely with DCC and developers to create a delivery and payment programme.

Direct impacts will be mitigated through site specific agreements. Wider cumulative impacts will be mitigated through the payment of CIL. The councils have a draft CIL regulation 123 list which contains schemes or scheme elements not being paid for through site specific agreements to avoid double counting.

Question 9(i)
The Examiner has asked the following question on the Dorset Heathlands DPD
Concern is expressed that the method of dealing with the compulsory Dorset Heathlands requirement contributions is not clear. Clarification is needed from the Council.

Council's Response

The heathland mitigation, as set out in the Preferred Options of the Heathland DPD, is the same as that detailed in infrastructure plan. This mitigation will be top sliced from CIL, and will account for around a quarter of all of the CIL income. In the allocation of specific settlement extensions, the Council may through Section 106 also require that land be provided as SANGs in addition to CIL, and other S106 Affordable Housing and S278 contributions (site specific transport). The viability of each site will be assessed before allocation, in consultation with developer.

Question 9(ii)
The Examiner has asked the following question on the Dorset Heathlands DPD
Concern is expressed that the CIL charging schedule should be consistent with the Dorset Heaths DPD, and developers providing land for Suitable Alternative Natural Greenspace should not be required to pay this part of the CIL. Clarification from the Council would be helpful.

Council's Response

CIL disconnects the development from the infrastructure or mitigation. As explained in 7(ii) above, on settlement extensions the developer may be required to provide SANGs through S106 in addition to CIL. However, the total Council's income from CIL from settlement extensions will be used to pay for other mitigation such as transport, or go to the local community. It will not be used for heathland mitigation as that would be double counting. This is because the total CIL likely to be generated from settlement extensions is less than the required costs of railway reconnection (a priority on the Regulation 123 list). Therefore double counting will not take place. This will be set out clearly in monitoring reports.

Question 10
The Examiner has asked the following question on the ratio of net to gross site area
The Final Report does not mention the ratio of gross site area to net developable area in the viability assessments, which is of general concern, and also specifically relevant to policies BIO (Biodiversity and Geodiversity), GI (Green Infrastructure, Recreation and Sports Facilities) and FR (Flood Risk). Clarification is needed from the Council.

Council's Response

The issue of gross to net is only of concern if the benchmarks being used can be made sense of in terms of gross and net. In practice benchmarks are usually a mix of a range of different types of sites. The extent of gross to net affects prices within individual development in different ways. We have presented our analysis in a consistent way with previous and extensive related work.

Green Infrastructure will only be required in settlement extensions through separate S106 (if even required). Any recreation contributions will be taken from CIL (if there are any funds left over). Policy FR may require SUDS within a scheme, which as set out in our response to 4(i) are already covered by build costs.

Policy BIO is about replacing lost trees with new trees etc. and should come out of residual value if they have to do this. These are unpredictable exceptional costs and of course are negotiated on site by site basis.

Question 11
The Examiner has asked the following question on mix and density assumptions
The Final Report does not provide any explanation of the mix and density assumptions used in the viability assessments. If the mix/density ratio is incorrect, the Gross Development Value would be artificially inflated. Clarification is needed from the Council.

Council's Response

The mixes, as outlined in table 3.2 of The Community Infrastructure Levy and Development Viability Assessment report (CD33), were tested and approved in the Workshop. They are not inconsistent with development elsewhere. The mix reflects a compromise between meeting housing needs and the demands of the market.

Question 12
The Examiner has asked the following question on conversion schemes
Concern is expressed that there is no acknowledgment that the economics of conversion are very different to those of new build schemes, and that the imposition of CIL could put some of these schemes at risk. Clarification is needed from the Council.

Council's Response

Conversion should not create additional floor space so would not be liable for CIL. If there is any additional floorspace this would have to be over 100sqm before CIL liability is triggered and in these exceptional circumstances CIL will be a very small ancillary cost in the scheme of things.

There may be the case that CIL is charged for conversion of a building if it is classified as dis-used. However, with this in mind, it is likely that landowners will ensure it has a period of lawful use prior to any application. In addition there may not be an affordable housing contribution unless the site area is over 0.05 hectares. If there are issues of viability these will be dealt with on a case by case basis.

Question 13 (i)
The Examiner has asked the following question on cumulative impacts
Concern is expressed, with reference to the Framework (paragraph 174) that the cumulative impacts of CIL and other standards and policies could put the implementation of the Local Plan at serious risk. Clarification is needed from the Council; has the Council formed a view as to what percentage of development would be put at risk through the implementation of the proposed CIL?

Council's Response

The Council has no concerns over the impact of PLP1 policies on development being viable in all of the housing sub markets, except for Upton in the short term (see Council's response to 13 (ii) below). All of the sub markets will provide a competitive return to the landowner to develop under the new Local Plan affordable housing policy and CIL rates. However, prior to PLP1, affordable housing thresholds were higher so that many landowners escaped affordable housing. In common with the reaction of landowners in other local authority areas, the change in the policy environment will require a period of bedding in. That is why the Council in its housing trajectory and supply policy (Policy HS) only set a benchmark of 25% of past windfall to continue to come forward in the plan period – this is significant reduction considering that past housing performance is predominately windfall (92% of supply or 114 dwellings per year). Policy AH does not apply to single dwellings, which make up a significant proportion of windfall. The Council is already halfway towards meeting its housing target for the plan period, with 14 years to go. The Council has recently granted planning permission for the first PLP1 settlement extension at Worgret Road, Wareham (see Council response to Matter 2.1) with 50% affordable housing and section 106 agreement of a similar amount to the proposed CIL rates. This permission will send a message to landowners and developers that the Councils PLP1 policies are justified and deliverable. The landowners of the two other PLP1 allocated settlement extensions have indicated that they plan to bring their sites forward in the next 12 months.

Employment is zero rated so will not be effected by CIL. Most new retail development will fall under the 100sqm threshold so not be CIL liable. The only likely contributor of CIL will be a new or expanded supermarket at Swanage. However, the Co-Op who occupy the prime potential site in the centre of Swanage has not objected to the CIL charging schedule. This is probably because the transport contributions under the outgoing Section 106 towards the Purbeck Transport Strategy would be of a similar or higher amount.

Therefore the Council is confident that PLP1 is deliverable.

Question 13 (ii)
The Examiner has asked the following question on cumulative impacts
Concern is also expressed that the proposed rate of CIL does not sufficiently cater for the lower value areas of the District. Clarification is needed from the Council.

Council's Response

Andrew Golland Associates and the Council recognises that current viability in the Upton and Purbeck Rural Centre submarkets is tighter than elsewhere in the District and that is why we recommend lowering the CIL rate to £30 for residential development as set out in the Statement of Modifications (SD04). The Purbeck Rural Centre has higher residual values than Upton but the 2 submarkets are grouped together to simplify the CIL rates into 3 areas each of 2 sub-markets. In the short term the Council recognises it may not achieve 40% affordable housing in these submarkets, and it is likely that most housing developments will request an open book viability assessment to negotiate affordable housing contributions.

It is important to ensure that new housing development in Upton does pay some CIL to at the very least cover some of its essential heathland mitigation. For example a 3 bed house under current Section 106 arrangements pays a contribution of £1,500. CIL for an open market 3 bed house in Upton and the Purbeck Rural Centre submarkets would pay £2,400. It is important to remember that affordable housing is not liable to a CIL levy, but has to be mitigated for, so has to be paid for from the market dwellings.

Question 14
The Examiner has asked the following question on the review of CIL
The Council has stated in response to some representations that it intends to regularly review CIL. Clarification from the Council would be helpful, in terms of date(s) and/or trigger points.

Council's Response

At the very least the Council will revise CIL alongside the Partial Review to the PLP1. The Partial Review is due for adoption in 2017. Therefore the revised CIL would follow on immediately. Ideally both plans should be worked up and examined together.

In the meantime, through the plan, monitor, manage approach the Council will continue to monitor housing and retail completions to see if the effects of CIL and other policies (e.g. Policy AH affordable housing) lead to a dramatic drop in developments being implemented. This may, if necessary lead to an earlier review of CIL.