

Name/Organisation			Representation summary	SBC Response
Mrs	Margaret	Hawkins	Object to target number of affordable houses being reduced	Levels of affordable housing to be provided by new development are set out in the Local Plan. The CIL rates being proposed take into account the requirement for affordable homes, it does not reduce the target.
Mr	Chris	Oak	Consider the future of Fairlands Valley Farmhouse	Noted. The future of Fairlands Valley Farmhouse was the subject of an Executive Report in July.
Mr	Chris	Oak	How much will the sale of Fairlands Farmhouse contribute to the corporate kitty? There should be a sustainable long term plan	
Mr	Chris	Oak	Sale of the farmhouse will not make a significant contribution to any deficit	
Mr	Chris	Oak	Farmhouse should be considered as a funding option	
Mr	Roy	Warren	Will the Council be producing and Planning Obligations SPD to address funding for infrastructure excluded from a R123 List? An SPD would be welcomed to provide further detail on how infrastructure will be funded. Advice note referenced and SBC encouraged to make use of this when considering CIL/S106 for sports facilities and when preparing the R123 list. Be clear that CIL will be used to fund specific facilities on the R123 List but that other S106 will still be used to fund facilities not on the list and there is a link between the development and the facility which meets the S122 tests.	These comments will be taken into account when preparing the Regulation 123 list. The list will be published for consultation alongside the Draft Charging Schedule (DCS), providing a further opportunity to comment. A Planning Obligations SPD is being considered, but is outside the scope of this consultation. This would further clarify how money will be collected and spent.
Mr	Roy	Warren	Support IDP and IFG Tech Paper but IDP needs to be kept under review Review Sport Facility Assessment and Strategy	Welcome support The need to keep both the IDP and Sports Facility Assessment up-to-date is noted.
Mr	Roy	Warren	Welcome £0 charge for sport/leisure facility	Support noted.
Mr	Anthony	Glanfield	Comments made by the public are always ignored. Examples of Longmeadow Green and Bragbury End provided.	Comments noted. No views provided on the Preliminary Draft Charging Schedule or CIL more generally.
Mr	Clive	Donaghue	The PDCS contains an error in its description of the funding gap. The total is £90.5 million but is described as 'around £89 million'. Figures should be corrected.	Minor discrepancy was amended and re-published at the start of the consultation.
Hill Residential Ltd			Support principle of CIL, but need to ensure balance between CIL, S106 and Affordable housing and not over-burdening development. Crucial that evidence outlines key infrastructure required to support development and is up-to-date and well-informed. It is not clear what items SBC will be putting in R123 list and which will be CIL funded.	Support welcomed. Evidence is up-to-date and ensures a balance is struck between competing objectives, whilst retaining development viability. R123 list will be published alongside the DCS in the next round of consultation.
Hill Residential Ltd			Concerns regarding assumptions in viability evidence: - More typologies should be tested to reflect a wider range of scenarios. - Benchmark land values have not been updated from the 2015 study. Limited evidence to justify benchmarks adopted. Concerned that EUV of town centre schemes are tested against EUV of industrial land. - Build cost figures are 12 months out of date and too low. Same costs used for flats, where build costs are much higher. Other assumptions linked to build costs also require review. - Require further detail on what will still be sought via S106 to feed into viability assessment and for developer info. Unclear what evidence £2k per dwelling assumption is based on.	A Reg 123 List and further guidance will be provided to make clear what will be funded via S106. The assumptions used in the 2017 Viability Update are carried forward from the those set out in the 2015 study - updated as appropriate. The 2015 study was subject to detailed review and challenge through the Local Plan Examination where it was found sound (see para 185 of Inspector's Report). - In line with the CIL Guidance (in the PPG) says that 'Viability assessments should be proportionate, simple, transparent and publicly available in accordance with the viability guidance. Viability assessments can be prepared jointly for the purposes of both plan making and CIL charging schedules. This has been done. It is accepted that it is unfortunate the adoption of the Plan was delayed by the Secretary of State, however the approach taken is appropriate and proportionate. - The base modelling is set out in the Whole Plan Viability Study, including CIL – September 2015. This included a wide range of typologies (see Chapter 9) that were developed to be representative of the nature of development anticipated under the Stevenage Local Plan. - The 2019 NPPF and updated PPG clarifies the derivation of the Benchmark Land Values. The approach taken is fully in line with the updated guidance (the EUV Plus approach), allowing for 'a reasonable premium to the landowner'. This was carried forward from the earlier work. No alternative evidence has been presented. - The BLV were tested through the consultation process and carried forward from the local plan process. - The build costs and the values are over a year old, but are consistent with the evidence that supported the Local Plan so considered proportionate. - The same costs are NOT used for flats as for other types of development. The appropriate BCIS cost for each type of housing is used. The figure for low rise flats is £1262/m2 and high rise is 1617/m2. This compares to £1088/m2 for terraced housing, £1086/m2 for semi-detached housing and £1,267/m2 for detached housing. . - The s106 assumption of £2,000 per unit was a cautious estimate tested through the consultation process and informed by discussions with officers.

North Herts District Council		<p>Concerned to ensure adequate funding for infrastructure is achieved for delivery of the sites. Delivery of cross border, common or shared infrastructure should be discussed.</p> <p>Will site specific requirements continue to be secured through S106 with CIL in addition?</p> <p>The timing of the introduction of CIL is an important consideration</p> <p>Need to consider the mechanisms for the delivery of infrastructure and the issue of forward funding.</p> <p>Provide greater clarity on proposed governance arrangements in relation to delivery of infrastructure.</p> <p>Involve NHDC in R123 List details</p>	<p>S106 will still be collected alongside CIL for site specific infrastructure such as on-site primary school and healthcare provision.</p> <p>The timetable for the introduction of CIL is set out in the Council's Local Development Scheme.</p> <p>Arrangements for spending CIL income will be discussed and agreed at a later stage in CIL implementation.</p> <p>The Reg 123 List will be published for consultation alongside the Draft Charging Schedule (DCS).</p>
Historic England		<p>Encourage LA's to consider identifying the ways CIL can be used to implement Local Plan policies relating to heritage.</p> <p>The R123 List should reference 'Our streets and spaces public realm projects' as the type of infrastructure CIL will be spent on. But S106 may still be required for site-specific mitigation. You may wish to clarify this in the schedule.</p> <p>Encourage LA's to assert their right to apply discretionary relief for exceptional circumstances; where development affecting heritage assets and their settings/significance may become unviable if subject to CIL. Conservation of heritage assets should be taken into account when setting CIL rates. Conditions and procedures for CIL relief should be set out in a separate statement - i.e. where CIL relief would enable the restoration of assets on the at risk register.</p>	<p>These comments will be taken into account when preparing the Reg 123 list. The list will be published for consultation alongside the Draft Charging Schedule (DCS), providing a further opportunity to comment.</p> <p>A Planning Obligations SPD will be drafted to provide further guidance.</p>
Hill Residential Ltd		<p>Not clear how results of viability testing have been used to calculate the proposed rates. Question how flats and PDL sites have become significantly more viable. Request additional viability appraisals are provided with policy compliant and industry standard assumptions adopted.</p> <p>Not clear whether a buffer has been considered - recommend a minimum buffer of 30%.</p>	<p>The Viability Study and its subsequent updates provide the evidence base for the proposed CIL rates.</p> <p>The improvement in viability of flats is due to the very substantial increase in values of these types of unit - see Chapter 4 of the 2017 viability update.</p> <p>- In making recommendations for the rates of CIL three tests have been used. First the Residual Value is compared to the BLV. In line with the CIL Guidance (25-019-20190315), allowance is made for a 'buffer' of at least 30% is allowed for (it is over 40% on most sites). CIL was then considered as a proportion of the Residual Value, being an indication by how much the value of land may fall if CIL were introduced (less than 25%). CIL was then considered as a proportion of the value of the completed scheme (less than 3%). This analysis is set out in Chapter 10 of the 2017 CIL Viability Update.</p>
Hill Residential Ltd		<p>Welcome SBC recognition of varying site characteristics in terms of values and different rates by area. But concerns around lack of justification of the location of the boundaries between the two charging areas, which is based on Local Plan inset area, rather than policy or values. Recommend additional site-specific viability testing.</p>	<p>It is accepted that values do not alter across hard lines. The setting of CIL zones is a quantitative and qualitative basis. The central area of the area where flatted development predominates.</p> <p>- A range of typologies have been tested in line with the PPG which says 'Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable' at 10-003-20180724.</p>
Hill Residential Ltd		<p>Concerns around the operation of CIL:</p> <ul style="list-style-type: none"> <li>- PDCS does not disclose if SBC will be implementing instalment policy. HDH's Viability Study makes firm recommendation that such a policy should be implemented and that modelling is undertaken on that basis. Recommend similar approach to Chichester.</li> <li>- Unclear whether Exceptional Circumstances, Social housing and Charitable relief will be made available. Recommend SBC makes this relief available.</li> </ul>	<p>Instalment Policy will be prepared. The DCS clarifies this.</p>
Bellway and Miller		<p>Support principle of CIL, but need to ensure balance between CIL, S106 and Affordable housing and not over-burdening development.</p> <p>Crucial that evidence outlines key infrastructure required to support development and is up-to-date and well-informed.</p> <p>It is not clear what items SBC will be putting in R123 list and which will be CIL funded.</p>	<p>Support welcomed.</p> <p>In setting CIL, the Council has struck a balance between the effect the levy will have and viability and the requirement to fund infrastructure to support new development (as required by CIL Regulation 14).</p> <p>R123 list will be published alongside the DCS in the next round of consultation.</p>

Bellway and Miller		<p>Incorrect approach to viability:</p> <ul style="list-style-type: none"> <li>- Benchmark land values are incorrect, thus overestimating the schemes viability.</li> <li>- Land area modelled is incorrect. Modelling assumes 50% of land will be net developable, whereas at least 38ha will be meadow land.</li> <li>- Build cost assumptions are out-of-date and too low not reflective of the proposed scheme nor industry. This also affects other costs that are linked.</li> <li>- Responses to planning application have requested S106 significantly above what has been modelled in Viability Study.</li> </ul>	<p>See comments above (response to Hill Residential).</p> <ul style="list-style-type: none"> <li>- The assumptions used in the 2017 Viability Update are carried forward from the those set out in the 2015 Viability Study - updated as appropriate. .</li> <li>- Viability assessments should be proportionate, simple, transparent and publicly available in accordance with the viability guidance.</li> <li>- The base modelling is set out in the Whole Plan Viability Study, including CIL – September 2015.</li> <li>- The 2019 NPPF and updated PPG clarifies the derivation of the Benchmark Land Values. The approach taken is fully in line with the updated guidance. The BLV were tested through the consultation process through the consultation process and carried forward from the local plan process.</li> <li>- The build costs and the values are over a year old, but are consistent with the evidence that supported the Local Plan so considered proportionate.</li> <li>- Site specific matters are responded to separately.</li> </ul> <p>Remodelling will be undertaken to take into account the comments relating to land area. It is agreed the area modelled should not include the meadow land. The remodelling will also include increased education costs, which reflect those now being requested by HCC.</p>
Bellway and Miller		North Stevenage should be zero rated and the contributions to infrastructure should continue to be delivered through S106.	The proposed CIL rates are based on a robust evidence base, which demonstrates CIL would be viable. S106 will be used alongside CIL on strategic sites.
Taylor Wimpey and Persimmon		There is a requirement to provide a list of infrastructure to be wholly or partly funded by CIL. Look forward to reviewing the list in due course.	The Reg 123 List will be published for consultation alongside the Draft Charging Schedule (DCS).
Taylor Wimpey and Persimmon		Have reviewed the Viability Update 2017 and consider that while majority of assumptions are on the lean side (externals, contingency, S106 and profit), in the round the inputs are generally appropriate. However, there is concern that increase in sales prices experienced recently is not sustainable. We will continue to monitor as consultation progresses.	Noted.
Taylor Wimpey and Persimmon		<p>Serious concerns that substantial infrastructure requirements for West of Stevenage development have been ignored and not factored into any of the viability work. Costs for access under A1(M) should include tunnelling for a pedestrian/cycling route, as per agreement with HCC. Should also include other highway improvements including improvements to Redcar Drive and roundabout at Clovelly Way (estimated at further £2m).</p> <p>Do not know assumptions on which 106 allowance has been based so have not been able to test. Concerns around double counting, particularly for education.</p> <p>Other costs have also not been considered including need for; acoustic fencing, aspirational and self build homes, supported/sheltered housing, cricket pitch, mitigation of noise pollution from airport, farmland birds mitigation. TW/P would be happy to work with SBC to agree infrastructure costs before the model is re-run.</p>	<p>It was demonstrated, and accepted by the Inspector, through the Local Plan Examination that sufficient access to serve the 1,350 homes can be provided using existing access routes (albeit improved), and a new bore is not required for this part of the site. Highways estimates provided by the developer were used to inform the modelling.</p> <p>Breakdown of 106 assumptions has been provided to the developers and a Reg 123 list will be published for consultation alongside the Draft DCS. The proposed CIL rates and S106 we intend to seek will not involve any double counting. A Planning Obligations SPD will be drafted to provide further guidance on what we expect to be funding from CIL and S106.</p> <p>Remodelling will be undertaken to include increased education costs, which reflect those now being requested by HCC. This modelling will also include a sum for acoustic fencing, as per the representation. The modelling already takes into account other Local Plan requirements.</p> <p>In terms of abnormal and other costs, the updated PPG says (10-012): abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites, should be taken into account when defining benchmark land value.</p> <p>The same thing is said about site-specific infrastructure costs, which might include access roads, sustainable drainage systems, green infrastructure, connection to utilities and decentralised energy (PPG10-012). In line with this, these costs must be reflected in the price paid for the land by the developer.</p>
Taylor Wimpey and Persimmon		Land remediation costs included (through contingency) are too low. Estimated at just under £7m by Homes England. Should be included as separate, site-specific infrastructure cost. Unclear how 2.5% contingency figure has been arrived at, 5% is used elsewhere. Site is part-brownfield, which should be taken into account. Assumptions on normal development costs result in a further under provision. Costs will be increased due to difficulties associated with access under A1(M) in comparison to other sites.	<p>Remodelling will be undertaken to take into account that the site is part brownfield. The contingency will be increased to 5% to reflect this.</p> <p>Land remediation costs have been treated as an abnormal cost (as per explanation in above response).</p>
Taylor Wimpey and Persimmon		Sensitivity testing should be undertaken, as in case of Basingstoke.	Sensitivity testing has been carried out through the plan-making process. Chapter 10 of the 2017 CIL Viability Update includes the testing of a wide range of levels of CIL.
Taylor Wimpey and Persimmon		<p><b>Implementation.</b></p> <p>The PCDS does not refer to the payment in kind mechanism, which could be required in a number of instances to facilitate delivery i.e. for the cricket pitch.</p> <p>Installments policy - the PCDS should make provision for interim payments, phasing should be included. Should clarify that CIL relief applies to qualifying social housing, where there is no registered provider or housing association identified to ensure timely delivery of affordable housing.</p>	<p>Further guidance will be provided relating to payments in kind, which will sit alongside the charging schedule once adopted.</p> <p>An Installments Policy will be published alongside the DCS, and input will be sought at this stage of consultation. The PCDS sets out who is liable to pay CIL.</p>
Taylor Wimpey and Persimmon		Affordable housing modelled only includes shared ownership and affordable rent and so does not reflect the actual requirement.	The Viability Study models affordable housing in line with the Local Plan policy requirements.

Herts County Council			Identified funding gap includes Total Infrastructure Cost of £131.1m - How have the costs, other sources of funding and the funding gaps been calculated? Provide details of infrastructure requirements included within these costs	The Infrastructure Funding Gap Technical Paper sets out how the funding gap has been calculated. Figures are largely based on the IDP.
Herts County Council			Costs are considerably higher than proposed rates in the schedule eg £9k per unit for primary education Will these charging rates adversely impact the ability of SBC to secure even partial infrastructure costs from development sites	Remodelling will be undertaken to take into account increased education costs, as per the representations received.
Herts County Council			Strategic sites where provision of infrastructure will be made by means of S106 obligations or S278 agreements to be identified and cross-referenced with IDP, IFG and the LP	A Planning Obligations SPD will be drafted to provide further guidance on what we expect to be funding from CIL and S106.
Herts County Council			HCC to be party to discussions on which infrastructure projects receive CIL funding Clarify timescales and how SBC intends to prioritise bids and allocation of CIL funding	Arrangements for spending CIL income will be discussed and agreed at a later stage in CIL implementation.
Herts County Council			CIL charging rates should differentiate between sheltered/extra care housing for profit and non-profit so that non-profit sheltered/extra care housing is exempt from a CIL charge. This has been adopted in other Districts in Hertfordshire.	Rates of CIL must be informed by viability evidence. Different rates are recommended for Sheltered Housing (£100/m2) and Extracare Housing (£40/m2) in the 2017 CIL Viability Update. This is reflected in the Draft Charging Schedule. It is not appropriate to set differential rates of CIL for particular developers or types of developer. However, affordable housing in this sector (as per the wider market) would not be subject to CIL.
Herts County Council			Use Classes should be added to the table of CIL Charging Rates	It is not considered necessary to include Use Classes in the table.
Herts County Council			Support the payment of CIL charge liability in instalments particularly for sites that are required to pay S106 and CIL	Support noted.
Herts County Council			There is no detail of governance and management arrangements for deciding which infrastructure projects receive CIL funding. HCC should be involved in these discussions and any decisions made.	Arrangements for spending CIL income will be discussed and agreed at a later stage in CIL implementation.
Herts County Council			HCC wish to be consulted and comment on the Reg123 list before it is finalised	The Reg 123 List will be published for consultation alongside the Draft Charging Schedule (DCS).
Herts County Council			HCC wish to be reassured that the land north and west of Stevenage and the town centre (SG1) will be excluded from the Reg123 List	The Reg 123 List will be published for consultation alongside the Draft Charging Schedule (DCS).
Herts County Council			Make specific reference to the exclusion of Fire hydrant infrastructure from the Reg 123 List	The Reg 123 List will be published for consultation alongside the Draft Charging Schedule (DCS).
Mrs	Margaret	Hawkins	Improve cycle routes, consider as part of development	Noted. These comments will be taken into account when determining how CIL monies should be spent. The Infrastructure Delivery Plan (IDP) sets out a schedule of infrastructure improvements we are seeking to implement to support the Local Plan. Many of these suggestions are included within the IDP.
Ms	Vicki	David	Spend Levy on better bus links between Stevenage and Hertford	
	Rosh	Ali	Improve local parks so that they feel safer Play equipment does not look safe More public recycling bins	
Great Ashby Community Council			Road improvements should be considered Bus services should be enhanced and costs reduced	
Ms	Helen	Jones	Use Levy for: Radiotherapy unit for Lister Hospital Improvements to Lytton Way carriageway divider Mobbsbury Way/Fairlands Way junction - new roundabout Footpaths and cycleways - resurfacing, better lighting	