

**Robyn Kelly**

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**From:** Mark Powney < >  
**Sent:** 28 June 2017 16:02  
**To:** DesignEnvironmentInfrastructureTeam  
**Subject:** Request to be heard: Revised Draft Charging Schedule & Statement of Modifications  
**Attachments:** Boyer BasingstokeDeane CIL Response280617.docx.pdf

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Hello,

Please find attached further CIL representations in relation to the Basingstoke Golf Course site.

Please contact me should you have any questions.

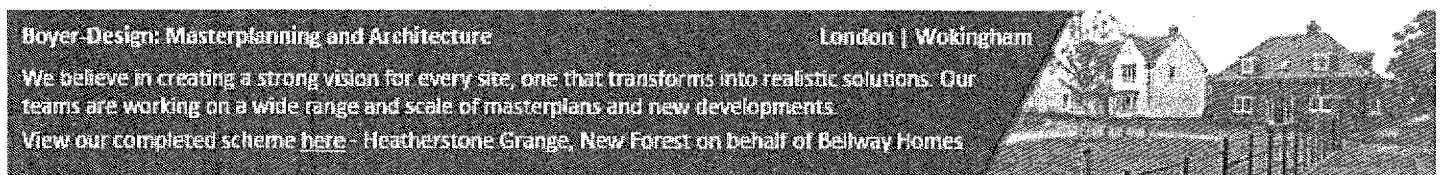
Regards

**Mark Powney MRTPI**  
Associate Director

**Boyer**

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Date – 28<sup>th</sup> June 2017

Ref - 17.7013

BY EMAIL:  
[deit@basingstoke.gov.uk](mailto:deit@basingstoke.gov.uk)

Dear Council

## Re: Basingstoke & Deane: Revised Draft Charging Schedule and Statement of Modifications

Boyer appreciates the opportunity to express our views on the Revised Draft Charging Schedule which has been submitted for examination on 31 May 2017 in accordance with Regulation 19 of the CIL Regulations 2010 (as amended). As requested by the Council we respectively confirm our desire to be heard at the public hearing in relation to the Statement of Modifications and wider discussions around the residential CIL rates.

Boyer is representing the prospective owners of the Basingstoke Golf Course. The Golf Course is included in the Local Plan under Policy SS3.11 as a major housing site for approximately 1,000 homes alongside significant supporting infrastructure. Below we detail our concerns around the assumptions used by the Council and their viability consultant in arriving at the proposed £80 psqm CIL charge. Ultimately we feel the costs of bringing forward large strategic sites such as our clients' has been underestimated in the 'Residential and Non-Residential Community Infrastructure Levy Viability Final Report March 2016' (the 2016 viability study). We outline below our reasons why and our views on where the viability assumptions used should be considered for amendment.

### Strategic sites viability appraisals

Firstly it would be helpful if the various Three Dragons Viability Reports included, as appendices, the full viability appraisals for the strategic sites so the full list of viability assumptions and their values can be more readily understood. This has been done for the non-residential uses. Without this detailed information it is more difficult to comment with the required level of detail.

The NPPG is very clear that strategic sites should be focused on when establishing a CIL Levy as follows –

*'The focus should be in particular on strategic sites on which the relevant Plan relies and those sites (such as brownfield sites) where the impact of the levy is likely to be most significant.'*

*Paragraph: 019 Reference ID: 25-019-20140612*

*'Large scale developments which are delivered over a number of years face particular issues in relation to cashflow and the delivery of on-site infrastructure.'*

*Paragraph: 056 Reference ID: 25-056-20140612*



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*'A charging authority should take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or brownfield land.'*

*Development costs include costs arising from existing regulatory requirements, and any policies on planning obligations in the relevant Plan, such as policies on affordable housing and identified site-specific requirements for strategic sites.'*

020 Reference ID: 25-020-20140612

While we are not disputing the Council has undertaken analysis to understand the viability of bringing forward strategic sites in accordance with the adopted Local Plan; the issue is that the appraisals themselves relied upon to set the proposed CIL rate should be made available.

#### Dwelling Size and Dwelling Mix

Dwelling size and mix assumptions have a significant impact on viability testing given they determine the quantum and type of floorspace to which sales value and build costs are applied. Again it is disappointing the actual viability appraisals have not been included so these assumptions can be interrogated more easily. Based on the material provided it appears significant changes in dwelling size assumptions have been made between the 2015 and 2016 viability studies. The differences between the 2 iterations of the viability evidence are outlined below.

Table 1 – Dwelling size assumptions

House type	Affordable sqm 2015 Viability Study	Affordable sqm 2016 Viability Study	Difference	Market sqm 2015 Viability Study	Market sqm 2016 Viability Study	Difference
1 bed sheltered flat	n/a	50		n/a	50	
2 bed sheltered flat	n/a	75		n/a	75	
1 bed flat	45	50	+5	51	50	-1
2 bed flat	62	61	-1	56	61	+5
2 bed terrace	73	70	-3	65	70	+5
3 bed terrace	85	85	+0	80	95	+15
4 bed terrace	95	97	+2	95	120	+25
3 bed semi	85	85	+0	95	100	+5
4 bed semi		97			120	
3 bed detached					100	
4 bed detached	95	n/a		125	130	+5
5 bed detached	n/a	n/a		150	160	+10

As can be seen significant increases in floorspace have been applied to the market housing units in the 2016 viability study.

Given the majority of the dwelling units applied to the 35 dph scheme (p92-93 of the 2016 study) are across the 3, 4 and 5 bedroom houses these increases would have had a significant impact on the viability results between the 2015 and 2016 viability studies; across a 1,000 unit scheme such as that planned for the Basingstoke Golf Course. This is confirmed by the fact the 2015 study concluded the Golf Course site had a residual value per gross hectare (standard scenario) of £497,000 vs £799,351 in the 2016 viability study. The resulting theoretical maximum CIL between

**Boyer**

both studies is equally large at £82 psqm and £178 psqm across the 2015 and 2016 studies respectively.

While we appreciate the adjustments in dwelling sizes in the 2016 study have probably been made in response to the nationally described space standard we feel they have been set too high at close to the upper range of each size band for 2-3<sup>1</sup> storey houses. In fact in the case of 5 bed properties the dwelling sizes used in 2016 viability study are beyond the upper limit. Given affordability issues in the UK and the push to maximise the development potential of land many house builders keep to the lower range of the space standards other than for luxury products in the highest value areas.

Table 2 – Comparisons with national prescribed space standards (market housing)

Number of beds	2-3 storey range in national prescribed standards (sqm)	2016 Viability Study (sqm)
3	84-108	95-100
4	97-130	120-130
5	110-134	160

We feel this again demonstrates the assumptions used in 2016 viability study have contributed to an over inflated scheme value and subsequently too high a proposed CIL charge for the Golf Course site.

#### Gross to Net Ratios

The dwelling mix applied to the 35 dph scheme (p92-93 of the 2016 viability study) includes flats. The study at page 94 states –

*'An allowance of 10% of floor area will be added to the 1-2 storey flats used in the 1ha site testing for circulation and common areas.'*

From our experience this is a low assumption, especially for high level testing. Given apartments have shared spaces such as corridors; and communal areas we would expect to see a circa 15% reduction between gross and net floorspace (ie 85%). An 85% gross to net ratio for apartments has been used as a standard assumption in other adopted CIL viability evidence for instance South Oxfordshire; Windsor and Maidenhead and London Boroughs of Hackney and Tower Hamlets. Using this lower assumption would likely have had a significant impact on overall scheme GDV especially considering the study seems to indicate that 4% of the units or approximately 40 in total are flats across a 1,000 unit scheme.

Early capacity modelling undertaken by our client indicates that if the Golf Course site is to achieve 1,000 homes nearly 300 of the units would need to be provided as either 1 or 2 bedroom flats. This further demonstrates the importance in using appropriate gross to net ratios and also brings into question the ability of the site to provide anywhere near 1,000 units based on the larger unit sizes tested within the 2016 viability study; especially across the 3, 4 and 5 bed houses discussed above.

Again being able to see the actual viability appraisals would enable the impacts of the above points to be interrogated more easily and reappraised for their impact on viability.

<sup>1</sup> These are the most likely form rather than 1 storey-type bungalows which are generally not favoured by the volume house builders

### Benchmark Land Value

The benchmark land value used for greenfield strategic sites is £400,000 per gross ha. We believe this to be a low assumption and this will therefore underestimate the likely cost of land in bringing forward development, especially given the end value of residential schemes has increased in recent times. The increase in residential values has been reflected in each of the more recent viability studies yet the benchmark land value for greenfield strategic sites has remained unaltered. This has created the situation whereby the value side of the viability equation has continually been increased while a major contributor to development costs (ie land cost) has remained the same thus leading to over inflated CIL charges.

The latest viability evidence<sup>2</sup>, when confirming the £400,000 per gross hectare level references DCLG analysis<sup>3</sup> from 2015. However more recently the latest two publications of the RICS/RAU 'Farmland Market Directory of Land' indicate the price of farmland / agricultural land is over £10,000 per acre (circa £25,000 per hectare).

Table 3 - RICS/RAU 'Farmland Market Directory of Land'

Period	Price per acre	Price per hectare*
H1 2016	£10,952	£27,063
H2 2016	£10,233	£25,286

As a further sense check it's useful to consider recent farmland transactions in Hampshire<sup>4</sup>.

Based on the transactions we have summarised in Table 4 below, it is evident a £10,000 per acre value for agricultural land is appropriate for high level testing. We appreciate Three Dragons use of 20 times agricultural value to reflect an alternative use (namely un-serviced residential) given the strategic sites are designated for residential development in the Local Plan. Based on this assumption a more appropriate Benchmark Land Value for strategic greenfield land, but adopting the higher agricultural value we have demonstrated below, is at least £500,000 per gross hectare. This revised value would increase the benchmark land value of the Basingstoke Golf Club site (46.95 gross ha) to £23.47 million from £18.78 million based on the current assumption in the 2016 Viability Study; an increase of nearly £4.7 million. This increased benchmark land value would have a significant impact on overall viability for developing the Golf Course and subsequently its ability to absorb CIL alongside on-site infrastructure requirements.

Table 4 - RICS/RAU Farmland Market Directory of Land Prices, Hampshire

County	Acres	Land name	Date	Guide Price	Price per acre
Hampshire	672.33	Stocks Farm, Privett, Alton, GU34 3NZ	Sep-16	£12,500,000	£18,592
Hampshire	246.27	Church farm Sparsholt	Sep-16	£1,250,000	£5,076
Hampshire	18.40	Land at Upper Wield, Wield Road, Medstead, SO24 9RT	Nov-16	£275,000	£14,946
Hampshire	5.02	Down Farm,	Dec-16	£1,100,000	£219,124

<sup>2</sup> Residential and Non residential Community Infrastructure Levy Viability Final Report (March 2016)

<sup>3</sup> Land value estimates for policy appraisal (2015)

<sup>4</sup> RICS/RAU Farmland Market Directory of Land Prices

		Abbotts Ann Down, SP11 7BX lot 1			
Hampshire	16.15	Land at Alderholt, Lower Daggons, Fordingbridge	Nov-15	£160,000	£9,907
Hampshire	100.00	Land at Martin, Hampshire	Oct-15	£1,000,000	£10,000

### Infrastructure Delivery Plan

Onsite infrastructure requirements are a significant but necessary cost to developing strategic housing sites. In the table below we compare the Infrastructure costs pertaining to the Basingstoke Golf Course as outlined in the Infrastructure Delivery Plan (May 2017) with the latest iteration of the Viability Study (March 2016).

Based on this analysis there appears to be a number of inconsistencies between the Infrastructure Delivery Plan and the Viability Study. A number of policy requirements (from Policy SS3.11) relating to enabling infrastructure appear to be missing from the viability modelling completely such as crossing points between the Golf Course site and Hounsome Fields; and Gypsies, Travellers and Travelling Showpeople pitch requirements.

However the most significant conclusion from the below comparison is that development costs modelled in the 2016 viability study appear to be circa £1.7 million lower than those identified in the Infrastructure Plan. While you would expect to see some inflationary impacts in the 12 months or so between publication of the viability study and more recent Infrastructure Plan; this does not explain the 15% (£1.7 million) difference. Modelling lower costs would obviously make redevelopment of the Golf Course site appear more viable and therefore able to support a higher CIL Charge. It is therefore critically important the Council explain this discrepancy.

**Table 5 – Comparison of infrastructure costs relating to the Basingstoke Golf Course site**

Local Plan Policy SS3.11 – Basingstoke Golf Course	Funding required from development (s106) identified in Infrastructure Delivery Plan – May 2017	2016 Viability Study	Notes
Pitch/plots for Gypsies, Travellers and Travelling Showpeople	Not specifically costed	Not specifically costed	It is difficult to understand how Local Plan Policy SS3.11 around Gypsies, Travellers and Travelling Showpeople needs have been taken into account in the CIL Viability modelling
Community centre, local shopping facilities, and sports facilities including playing pitches	Community Centres - £976,443 Playing pitches with change rooms - £246,054 Tennis courts / MUGA - £0	Playing pitches - £171,429 Tennis / MUGA - £182,857 Community facilities - £1,285,714	The 2016 viability study appears to have modelled costs over £400k higher than that contained in the Infrastructure Plan.
Improvements to the A30 corridor & accesses from both Winchester Road (A30) and Beggarwood Lane	A30 / Brighton Hill - £0 A30 / Kempshott / Wallop Drive - £2,000,000 (approx) A30 Winchester Road - £500,000	£1,300,000	Highways cost in the Infrastructure Plan appear £1.2m higher than what has been modelled in 2016 viability study
Internal walking and cycling routes linked to existing external routes,	Route 5 on Proposed Strategic Cycling Network - £159,450		Walking and cycling costs have been identified in the Infrastructure Plan but not

the Public Rights of Way network, and the Strategic Cycle Network			modelled in the 2016 viability study
Crossing points to facilities provided on Hounsome Fields (SS3.12)	Not specifically costed	Not specifically costed	No costs appear to have been modelled despite crossing points being a requirement of Local Plan Policy SS3.11
Public transport	Not specifically costed	Bus - £700,000 Travel Plan - £350,000	£1.05 m of public transport costs have been modelled in the 2016 viability study
Sewerage (on and off site) and surface water drainage	Not specifically costed	Not specifically costed	We suspect these costs are included in site opening up costs and/or external works assumptions included in the viability modelling
Allotments and links to the existing green infrastructure network	Green space / play / allotments - £3,823,000	Open space - £2,470,000 Allotments - £163,200	The viability study modelling includes costs £1.2m lower than that identified in the viability study
3FE expansion of local school	£8,999,100 total (shared between Basingstoke Gold Course & Hounsome Fields)	£4,996,620 attributed to Basingstoke Gold Course	Both studies align on the costs here. However it is not clear why the costs attributed to the Golf Course where higher in the 2015 viability study at £5.7m vs £4.99 m in the 2016 viability study
70 place full day care nursery and one pre-school	£650,000	Not costs	Nursery costs have been identified in the Infrastructure Plan but not modelled in the 2016 viability study
<b>Total</b>	<b>£13,351,567</b>	<b>£11,619,820</b>	<b>CIL testing approximately £1.7 m lower than Infrastructure Delivery Plan</b>

Further detail concerning the reduction in costs associated with the 3FE primary school between the 2015 viability study (£5,700,000 for the Golf Course site) and 2016 viability study (£4,996,620) would be appreciated. While we acknowledge the difficulty in forecasting major onsite infrastructure costs for strategic sites any potential underestimation will contribute to a scheme appearing able to absorb a higher CIL Charge.

According to the 'Mainstream schools: area guidelines' published by the Education Funding Agency a 3FE primary school would require<sup>5</sup> between 3,253 sqm and 3,586 sqm of gross floorspace. Using applicable BCIS costs and assumptions around associated costs and fees gives a potential cost of between £8.8m and £9.7m. The current cumulative figure for the Golf Course site and Hounsome Fields (£8,999,100) is at the lower end of this range.

Table 6 – Potential costs of 3FE primary school

Floorspace	3,253 sqm	3,586 sqm
Median BCIS Cost for Primary School March 2016	£2,042 psqm	£2,042 psqm

<sup>5</sup> Using Mainstream schools: Schedule of Accommodation tools

External Works	15%	15%
Contingency	5%	5%
Professional Fees	10%	10%
Total Cost	£8,823,068	£9,726,259

### Onsite infrastructure costs

The above strategic infrastructure costs and the £200k per net hectare for site 'opening up costs' used in the 2016 viability study are considered low in comparison with accepted benchmarks.

For instance the Viability Testing of Local Plans (Local Housing Delivery Group 2012) suggests the costs associated with providing serviced housing parcels, i.e. strategic infrastructure and utility costs are typically in the order of £17,000 - £23,000 per plot for larger scale schemes. For the Basingstoke Golf Course these costs equate to only £17,334 per dwelling and therefore at the lower end of this range which was published 5 years ago. In the intervening period inflationary impacts have increased these costs further meaning in current day prices<sup>6</sup> this benchmark is circa £19,000 to £25,000 per dwelling.

Table 7 – Onsite infrastructure and site 'opening up' costs

Cost Item	Site total	Per dwelling
Onsite infrastructure modelled	£11,619,820 <sup>7</sup>	£11,620
Site 'opening up costs'	£5,714,000 <sup>8</sup>	£5,714
Total		£17,334

Examples of boroughs that have adopted either higher onsite infrastructure or site 'opening up' costs include–

- South Oxfordshire<sup>9</sup> who apply £15,000 per unit for strategic sites covering major on-site infrastructure and associated costs – this is in addition to £10,000 per units for s106/s278 discussed further below;
- Mole Valley<sup>10</sup> who apply £17,000 per unit concerning 'opening up' costs for schemes of 501+ units; and
- Guildford<sup>11</sup> who apply between £10,000 to £78,413 (depending on the strategic site) per unit concerning 'opening up' costs for schemes – this is in addition to required transport works plus an additional £8,000 per dwelling to cover s106 / s278 requirements.

### External Works: S106 / S278

The 15% external works assumptions is considered appropriate in covering items not considered as strategic infrastructure requirements or utilities. For instance the cost of pavements, driveways /

<sup>6</sup> Based on Bank of England inflation calculator between 2012 and 2017

<sup>7</sup> 2016 Viability Study

<sup>8</sup> Based on £200k per hectare across 28.57 net hectares identified in Annex 6 of the 2016 Viability Study

<sup>9</sup> South Oxfordshire Community Infrastructure Levy: Viability Study (2014 update)

<sup>10</sup> Mole Valley District Council Community Infrastructure Levy Economic Viability Assessment (May 2015)

<sup>11</sup> Guildford Borough Council Local Plan and CIL Viability Study (October 2016)

hard standing, lighting, landscaping, drainage, walls / fences, ground works etc. These costs are not included within the benchmark costs within the BCIS database as noted in the 2016 viability study.

It is felt however that the £1,500 per dwelling for s106/s278 for children's play/informal greenspace / minor local transport etc is a low assumption for strategic sites. Many other charging authorities have significantly increased their s106 / s278 cost assumption with respect to strategic sites in recognition of the higher costs associated with bringing them forward. For instance South Oxfordshire increased its s106 / s278 cost assumption 10 fold from £1,000 per unit to £10,000 per unit for strategic sites. For the emerging Cherwell CIL a similar approach has been taken, again increasing the s106/s287 cost assumption 10 fold from £10 psqm to £100 psqm of floorspace for strategic sites.

While we appreciate many on-site infrastructure items have been included specifically in the modelling for the Golf Course site; as discussed in Table 5 above; we question whether it is realistic to assume residual s106 will be scaled back to represent only 8.65% of development costs when compared to the cumulative total of onsite infrastructure items and site 'opening up' costs detailed in Table 7. Also the 'Planning Obligations for Infrastructure Draft Supplementary Planning Document' (May 2017) appears to require major developments to provide planning obligations to secure employment, training and apprenticeship opportunities for local residents and to increase awareness of construction industry roles and opportunities. It is unclear how this requirement has been included in the viability modelling.

#### Contingency Costs

The 2016 viability study does not include any contingency costs stating '*There is no requirement for contingency within the guidance for area wide viability studies and a 'buffer' is used to take account of variations in costs and values.*' From our experience including a contingency is standard practice within viability modelling whether it is for CIL Charging Schedules; Local Plan viability assessment or scheme specific appraisals. This is recognised in RICS guidance<sup>12</sup> which states -

*'E.3.2.3.4 In all costs, the inclusion of a contingency allowance to cater for the unexpected is essential. The amount is usually reflected as a percentage of the building contract sum and is dependent upon the nature of the development, the procurement method and the perceived accuracy of the information obtained.'*

Based on our experience we feel a 5% contingency added to BCIS costs should be applied to take account of unforeseen increases in building costs. Given the modelling to support CIL charges is necessarily high level; testing generic type schemes; a contingency is considered even more necessary given the lower level of accuracy compared to viability test specific planning applications. We therefore do not accept the 2016 viability report's assertion that use of a buffer negates the need for a contingency cost. While we support the use of a buffer; it should be applied to the end viability result(s) to ensure the final CIL charge isn't set at the margins of viability; rather than in place of what is a standard viability modelling input.

Table 8 – CIL Charging Authorities, approach to contingency costs

Charging Authority	Contingency Assumption <sup>13</sup>	Charging Authority	Contingency Assumption <sup>12</sup>
South Oxfordshire	10% <sup>14</sup>	London Borough of	5%

<sup>12</sup> RICS, Financial viability in planning (1st edition (GN 94/2012)

<sup>13</sup> % of BCIS build costs

<sup>14</sup> For strategic sites

		Hackney	
Windsor & Maidenhead	2.5% - 5%	Hart	5%
West Oxfordshire	5%	Guildford	5%
Wycombe	5%	Mole Valley	5%

### Interest Costs

Interest cost assumptions have continually been reduced from 7.5% originally in the 2013 viability study; to 7% in the 2015 Golf Course and Hounsome Fields viability report to 6% in the 2016 viability study. It is felt the 6% interest rate used in the 2016 viability study is too low an assumption; 6.5% to 7% is considered more appropriate especially given Brexit.

Several leading market commentators have passed judgment on the impacts of Brexit and mortgage lending. For instance Savills<sup>15</sup> state –

*'The initial after-effect will be on buyer sentiment, which is likely to weaken buyers' resolve to commit to a purchase. In itself this will potentially result in an initial drop in transaction numbers and a drag on house price growth.'*

Howard Archer, the chief UK economist at IHS Markit, has said that against this backdrop house prices were likely to come under increasing pressure –

*"We suspect markedly weakening consumer fundamentals, likely mounting caution over making major spending decisions, and elevated house price to earnings ratios will weigh down further on housing market activity and house prices over the coming months."*

Further the Bank of England's latest statistical release<sup>16</sup> regarding mortgage lending concludes £62.8 billion of new residential loans was advanced to individuals during October-December 2016. This was a 2.6% decrease compared to the previous quarter and a decrease of 0.4% over the past four quarters. The data also showed a further slowdown in the year-on-year pace of borrowing by consumers, another signal of how households are reining in their spending in the face of rising inflation after last year's referendum decision to leave the European Union.<sup>17</sup>

Given current economic and political uncertainty; not to mention the limitations of high level viability testing; the majority of other Charging Authorities viability evidence has adopted more conservative interest costs assumptions; typically within the 6.5%-7% range. Large developments on strategic sites are particularly sensitive to finance charges and given recent increasing inflation in the UK and that interest rates are predicted to rise; the 6% interest assumption should be revised upwards.

### Build Programme

The information provided around build programme assumptions; as detailed in Annex 6 of the 2016 viability study is considered brief; particularly around whether any allowance has been made for site preparation and/or after sales. We also consider the sales rate applied of 150 dwellings per annum from year 3 as an optimistic assumption. From our experience a sales rate of 3-4 dwellings per month (36-48 dwellings per annum) is appropriate for large strategic sites. Given the size of the

<sup>15</sup> [http://www.savills.co.uk/research\\_articles/205507/206115-0](http://www.savills.co.uk/research_articles/205507/206115-0)

<sup>16</sup> <http://www.bankofengland.co.uk/prd/Documents/regulatorydata/mlar/2016/q4.pdf>

<sup>17</sup> <http://uk.reuters.com/article/uk-britain-lending-idUKKBN1800SQ>

proposed Golf Course site we would expect 2, possibly 3 developers, to build out the site giving a maximum sale trajectory of 108-144 dwellings per annum. It is also noted the Council's Draft Planning Obligations SPD (May 2017) indicates at paragraph 6.7 that contributions will be indexed in accordance with the Building Cost Information Service Index (BCIS) published by the Royal Institution of Chartered Surveyors. This requirement doesn't appear to have been incorporated within the viability modelling.

#### Buffers and Sensitivity testing

Boyer welcomes the 2016 viability study's approach to using buffers as a means of accounting for unforeseen circumstances and site specific costs that may arise. What is not clear is how the sensitivity testing has informed the final proposed CIL rates. The majority of the revised inputs considered under sensitivity testing are based on improved market conditions. It is important any sensitivity testing doesn't just consider optimistic assumptions based around increases in sales values. Given current uncertainty around the UK's economic relationship with Europe and wider uncertainty in the market (which the recent credit crisis reminded us of) a moderation of house prices and a period of stagnation should also be tested alongside flat or increasing build costs to test their impact on development to absorb a CIL.

#### **Conclusion**

I hope the above comments are considered constructive. The Council needs to publish the full viability appraisals for the strategic sites as a first step. Through the various iterations of the viability evidence numerous assumptions have been altered that significantly improve the viability of developing the Golf Course site; most notably increasing dwelling sizes; reduced finance costs and lower infrastructure costs compared to the Infrastructure Delivery Plan. As outlined we considered many of these assumptions are not sufficiently justified and cumulatively have resulted in a high CIL charge in addition to significant onsite infrastructure requirements. Should the matters we raise be incorporated in the appraisals we feel a nil rate for the Golf Course site will be evidenced.

Yours sincerely



Mark Powney  
Associate Director  
Development Economics



**Boyer**