

- 1.1 I have some reservations about this document, in terms of whether it gives a fair and complete picture. CIL has now been adopted in a total of 17 Local Authority areas in the South West of England – yet AD8 refers to only 3 of those. It might have been more informative to produce a table comparing the costs assumed/agreed in the CIL Viability Evidence for those 17 areas in the South West, than to introduce selected data from 23 Districts in other Regions.
- 1.2 It is also difficult to draw any clear conclusion from this data in the absence of information on house prices and Gross Development Values generally in the very different Districts concerned. Higher opening up costs will be attainable/viable in higher value areas, for example, and that is certainly the case in the 3 South West Districts referred to in the Table.
- 1.3 On 10 August 2016, the day after the Examination hearing, SSDC posted information concerning s.106 requirements for the two Yeovil SUE's, on the portals relating to the two outline planning applications for those sites – 14/02554/OUT for Up Mudford and 15/01000/OUT for Keyford. The hyperlinks to each of these postings are:  
<http://cip.southsomerset.gov.uk/Planning/lg/GFPlanningViewDocumentInDialog.page?DocNo=7914939> and  
<http://cip.southsomerset.gov.uk/Planning/lg/GFPlanningViewDocumentInDialog.page?DocNo=7914941> respectively, but for ease of reference a copy of each list of s.106 requirements is attached to this Response statement (**Appendices X and Y**). This level of detail has been sought and awaited by both Mudford and East Coker Parish Councils for some time.
- 1.4 I have prepared a summary of the key costs and headings at **Appendix Z**. There are still several blanks in the costings, but those for Education and Community/Health/Leisure facilities appear reasonably complete. The items highlighted in blue text are specifically stated to be for off-site facilities that I believe would cease to be appropriate s.106 obligations if SSDC's Revised Draft Regulation 123 List (**Table 3.1 in AD2**) is adopted. This would reduce the total burden of s.106 obligations on each SUE to about £8m, before taking account of the unknown costs associated with various highway, footpath and cycleway works.
- 1.5 I would note, in passing, that a CIL charging rate of £40 per sqm on the Yeovil SUE's would yield a greater contribution for SSDC towards community infrastructure, than their suggested s.106 obligations that are highlighted in blue text at Appendix Z.
- 1.5 Recognising Dr Lee's extensive experience in this field, I was content to rely in my previous submissions on BNP Paribas' assumption that s.106 obligations and the cost of similar opening-up works/requirements could be met within an allowance of £10,000 per dwelling. But now I am less sure that Dr Lee had anything to do with SSDC's adaptation in March 2016 (**ED10**) of the 2015 and 2013 appraisals/studies; and it is evident from the information at Appendices X and Y that a combination of s.106 and other opening-up costs will exceed that previous allowance. It is possible to identify some additional opening-up costs that are likely to apply to the Keyford site in particular, on page 2 of SSDC's list of Priority 1 Infrastructure (**ED12**). The 4 items shown there carry a combined total estimated cost of c.£2.5m and cover off-site electricity cables and gas main reinforcement, new off-site sewers and water mains. However, it seems unlikely that the total "unknown" cost of the various highway works listed at Appendix Y will exceed £1.5m.
- 1.6 The reality is that the extent of the new highway infrastructure needed to open up these two sites is relatively light, not only in relation to the Gross Development Values that both sites can be expected to generate, but also by comparison with the much heavier road construction costs

(for example) that to my personal knowledge have been involved in opening up strategic sites in Exeter and Taunton.

- 1.7 Whilst it is now clear to me that s.106 and other enabling/opening-up costs will exceed the allowance of £10,000 per dwelling used by SSDC and BNP Paribas in their Viability Appraisals, I do not consider that that will be by as big a margin as the data in AD8 might suggest. Indeed, I question whether the data provided in AD8 is sufficiently clear, and pertinent to the Yeovil SUEs, to be of much value in assessing whether it is viable for those sites to pay a positive CIL rate.
- 1.8 Reflecting on the new information that is available, as described above, I have concluded that an allowance of £15,000 per dwelling would be appropriate in the case of the Yeovil SUE's. I have prepared revised appraisals on that basis, which are attached as Appendices A and B to my Response to AD1 and AD3.

24<sup>th</sup> August 2016

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