

# **Exeter City Council: Community Infrastructure Levy Review**

**Draft CIL charging schedule**

**Consultation Statement**

**March 2023**



# Contents

- 1 Introduction
- 2 The Draft CIL Charging Schedule Consultation
- 3 The Draft CIL Charging Schedule Consultation: Summary of consultation responses
- 4 Responses to the proposed rate for flatted development
- 5 Responses to the proposed rate for build to rent
- 6 Responses to the proposed rate for purpose built student accommodation
- 7 Responses to the proposed rate for co-living
- 8 Responses to other elements of the Draft Charging Schedule and supporting documentation
- 9 Responses regarding the residential rate
- 10 Responses regarding the out of city centre retail rate
- 11 Responses regarding rates for any other uses

Appendix A – Finance rate sensitivity test

Appendix B – Offline responses

## **1. Introduction**

- 1.1. This report explains how Exeter City Council has undertaken public consultation and considered responses in preparing the Community Infrastructure Levy (CIL) Draft Charging Schedule. This is a review of the current Charging Schedule which Exeter City Council implemented in 2013. This consultation was the official publication of the Draft Charging Schedule required under Regulation 16 of the Community Infrastructure Levy Regulations 2010, as amended by the 2019 Regulations.
- 1.2. The Council undertook public consultation in preparing the Draft Charging Schedule at the end of 2022 and beginning of 2023.
- 1.3. This document is consistent with the requirements of Regulation 17 of the Community Infrastructure Levy Regulations 2010, as amended by the 2019 Regulations, which require the council to set out the number of representations made and a summary of the main issues raised (along with copies of any representations) on the Draft Charging Schedule. Accordingly, this consultation statement will be submitted to the Examiner who will carry out an examination.
- 1.4. Appendix A provides additional evidence relating to finance rates which has been undertaken in response to representations made.
- 1.5. Appendix B provides a list of the longer consultation responses provided outside of the online engagement platform used to host the consultation. These responses have been provided separately.

## 2. The Draft CIL Charging Schedule Consultation

- 2.1. The Draft CIL Charging Schedule was available for public comment between 14 December 2022 and 25 January 2023. This six week period is two weeks more than the four week minimum suggested in the planning practice guidance. This six week period was in accordance with the Council's Consultation Charter<sup>1</sup>.
- 2.2. Responses to the charges in the draft Charging Schedule were invited online through the Commonplace online engagement platform. The option to email or post responses was also available. Paper copies of the consultation material and questions were available and alternative formats of the material was available on request.
- 2.3. Consultation questions were structured in order to enable respondents to provide detailed comments or to reply quickly and easily if they had less time. A five point scale of agreement and an open question asking respondents to explain why they felt that way was posed for every rate in the Draft Charging Schedule.
- 2.4. The consultation was promoted through a variety of means including:
  - Email/letter to all contacts on the City Council's planning policy consultation database. This included all statutory consultees.
  - Email to companies who had previously fed into the informal engagement work related to the assumptions of the viability evidence.
  - Press release
  - Social media
  - Copies of the consultation material and surveys were provided in the reception of Exeter Civic Centre and all city libraries.
  - Emails highlighting the consultation to all community builders
  - Prominence on the Exeter City Council homepage
  - The offer of providing consultation documents in alternative formats.
- 2.5. A total of 77 respondents provided 600 responses to the consultation. Three emails from Devon County Council, South Somerset District Council and Natural England confirmed that the respective organisations had no comments to make.
- 2.6. The responses received during consultation have been reviewed and taken into account. No revisions to the Draft Charging Schedule have been made as a result of the responses received during the consultation.

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<sup>1</sup> Available at: <https://exeter.gov.uk/media/6219/consultation-charter-accessible-version.pdf>

### 3. The Draft CIL Charging Schedule Consultation: Summary of consultation responses

3.1. In total, 600 responses were received on the Draft Charging Schedule. A summary of the main issues raised during the consultation, grouped by development type/CIL rate is set out below. Many of the responses received were not regarding the CIL rates themselves but on associated planning issues regarding development of a particular type, particularly Purpose Built Student Accommodation and co-living. It should be noted that the CIL review has only proposed to introduce new, or revise, four CIL rates. For completeness, respondents were able to provide comment on all the rates in the CIL Charging Schedule and responses for those rates are included here. The Council is not, however, proposing to review these rates.

#### 3.2. Flatted development: Summary issues raised:

- That charging rates should be linked to the number of floors and height of a building
- The requirement for high quality design
- The need for appropriate supporting infrastructure
- That the proposed rate should be set at a higher level
- The concern that flatted development is Purpose Built Student Accommodation in another guise

#### 3.3. Build to rent: Summary issues raised:

- That charging should be linked to the number of floors and height of a building
- The requirement for high quality design
- The concern that the high level of rents is not in line with local salary rates
- The need for appropriate supporting infrastructure
- That the proposed rate should be set at a higher level
- The concern that build to rent is Purpose Built Student Accommodation in another guise
- The requirement for social housing within this type of development
- Some level of general support for this type of development

#### 3.4. Purpose built student accommodation: Summary issues raised:

- A need to avoid too much Purpose Built Student Accommodation in certain areas of the city
- A concern regarding the height, massing and density of this type of development
- Support for the higher proposed rate
- The need for appropriate supporting infrastructure

#### 3.5. Co-living: Summary issues raised:

- The concern that this is Purpose Built Student Accommodation in another guise
- A concern regarding the height, massing and density of this type of development
- Support for the higher proposed rate
- The need for appropriate supporting infrastructure
- Suggestions that the rate for co-living and Purpose Built Student Accommodation should be the same or similar.

3.6. As mentioned above, for completeness, respondents were able to provide comment on all the rates in the CIL Charging Schedule and responses are summarised here.

#### 3.7. Residential: Summary issues raised:

- Support for a higher proposed rate
- Support for a lower proposed rate
- An unfair bias to support other development types

- The need for appropriate supporting infrastructure

3.8. City Centre Retail: Summary issues raised:

- Support for a lower proposed rate
- Concern over the impact of CIL on the viability of retail development
- Suggested refinement of retail charging zones

3.9. Other Uses: Summary issues raised:

- The need for appropriate supporting infrastructure
- Concern that the question covered to many development types to enable meaningful input
- Various points duplicating the development specific comments made to other sections of the consultation

3.10. General comments on the proposed charging schedule or the supporting documents

- Some support for the proposed rates within the schedule. Conversely, others raised concerns with the rates.
- The need for appropriate supporting infrastructure
- The need for a joined up vision for Exeter
- Questions on how the Charging Schedule will be implemented until a new Local Plan is adopted
- The potential to explore a sliding scale of CIL depending upon Net Zero credentials
- Comments upon the spending and the prioritisation of CIL receipts
- The need to consider a wider viability buffer relating to changes in finances rates (see Appendix A for further sensitivity testing).

#### 4. Responses to the proposed rate for flatted development

Question: Do you agree or disagree with the proposed flatted residential rate?

	Number of Respondents	%
Agree	13	28
Disagree	34	72

Do you have any comments on the proposed flatted residential rate?

Name	Response	ECC comment
Ian Hodgson	Depends on the individual case.	Comment noted. No revision to proposed charges required.
John Yates	What does "neighbouring uses" mean? This survey seems designed to spend allocated year term funds so as not to lose them next year. What is the point of it?	Comment noted.  'Neighbouring uses' refers to uses/occupiers within the same building above and/or below' the flat in question. The consultation does not ask questions about how CIL is spent, it seeks views on a series of proposed CIL rates.  No revision to proposed charges required.
Phyllida Brown	Given that the rate is based (as I understand it) solely on floor plan /m2 and not on the height of the building, I think there should be a differential rate for any building exceeding two/three storeys in height. Could the council consider a higher levy for buildings of four storeys, additional charge for five storeys?	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that flatted development, which can be of a number of stories, is less viable than other forms of residential development. It is not, therefore, considered appropriate to increase CIL rates on the basis of increases in the heights of buildings.  No revision to proposed charges required.
Anonymous	This appears a desperate measure to answer Exeter's housing crisis. While it is accepted that with such a high need for residential units, flatted options for sale will need to be a part, it is vital to stand back and consider the intended and likely effect of this encouragement to developers. As it occupies the largest proportion of urban land, housing is known to be the definer of the personality of a city. The personality of Exeter has undergone a massive shift over the last two decades with the proliferation of PBSA. Flatted residential, particularly, high rise, could further change the personality in a way that many would regret. Is it possible to differentiate the rate for high rise and low rise flatted development? Great care with planning policy would be required to ensure such an economic encouragement to developers doesn't blight the city and provide accommodation where few would choose to live. Very high quality design would be essential. I believe there should be a CIL charge, at the same rate as for residential above, as any development places pressure on surrounding infrastructure, so none should be exempt.	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that flatted development, which can be of a number of stories, is less viable than other forms of residential development. It is not, therefore, considered appropriate to increase CIL rates on the basis of increases in the heights of buildings. Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.  No revision to proposed charges required.
Paul Layton	Why is this category exempt? Such development implies a density of accommodation which inevitably will require greater infrastructure and should be charges accordingly.	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that flatted development, which can be of a number of stories, is less viable than other forms of residential development.

Name	Response	ECC comment
		<p>Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Stephanie Eaton McLaren	<p>CIL is intended to reflect and mitigate the impact that all schemes have in terms of infrastructure. This represents an unfair bias for residential flatted to buy schemes to have no CIL liability at the expense of other new residential models for rented accommodation. All residential schemes create an impact on their environment and as such residential flatted should be subject to a reasonable levy. We would like to see the data that has been tested for flatted residential in terms of density/size and value, also benchmark land value.</p>	<p>Comment noted.</p> <p>CIL rates are based on the viability of development rather than infrastructure requirements.</p> <p>No revision to proposed charges required.</p>
Annette Plaut	<p>A flatted residential rate of £0/sq. m will only encourage, in areas in close proximity to the University, such new-build flats being snapped up by investment buyers and rented to students as HMOs to the detriment of community balance in such city areas with already high numbers of HMOs. This is investment purchasing of new-build flatted residential properties is not covered by the Article 4 Direction.</p>	<p>Comment noted.</p> <p>Due to the nature of the development, flats are unlikely on an individual basis to be converted to houses in multiple occupation. The Council is undertaking a separate review of the Article 4 area with regard to HMOs.</p> <p>No revision to proposed charges required.</p>
Gert Vonhoff Exeter Civic Society	<p>ECS: The increase in Flatted Residential (more high-density) is supported, but we see this as a lucrative segment of the market for developers: we suggest a CIL rate in line with BtR. The reasons for it not having been developed in higher numbers in Exeter have to do with the availability of single home residential plots in the past, which won't be available for future planning.</p> <p>For at least two of the five types of Flatted development (see 5.4, Viability Evidence), there is some, though low CIL headroom; only the higher density developments with 150 and 350 units do not show any CIL headroom. The incentive for developments up to 75 units will benefit the social cohesion both within and in the neighbourhood of the development (occupants will get to know each other more easily). As the Exeter Plan promotes mixed developments, the smaller unit numbers for this sector will be in line with this.</p> <p>Further reasons for setting the rate higher are:</p> <ol style="list-style-type: none"> <li>1) A fine line needs to be considered here: on the one hand, the Exeter Plan promotes higher density flat based developments to create low-carbon, low-travel neighbourhoods, where families can be brought back into the city centre; on the other hand, the flats seem to be for the sale market, so lucrative for a developer with the Exeter market prices. Otherwise the differentiation between Flatted Residential and BtR would not make much sense.</li> <li>2) Alternative one can argue that there should be no distinction between Flatted Residential and BtR as <ol style="list-style-type: none"> <li>a. The accommodation is the same, with the possible exception of extra facilities in BtR such as gyms, although these all feature in developments of flats for sale. The costs of building should therefore be similar, possibly more expensive for BtR so why should the CIL be different.</li> <li>b. Flats built to be sold can easily be rented out once bought so the Flatted Residential/BtR distinction is not a real one.</li> <li>c. Other local councils charge more for ordinary residential accommodation which includes both Flatted and BtR. Hard to see why Exeter should be different.</li> </ol> </li> <li>3) The older people's flatted accommodation should be included in the calculations they seem to be popular amongst developers judging by Millbrook and they have paid the CIL at the residential rate so hard to see why they should get a free pass.</li> </ol>	<p>Comment noted</p> <p>The Core Strategy currently allocates major greenfield urban extensions which has supported the provision of more traditional housebuilding. The emerging Exeter Plan is looking to amend this approach in support of strategic brownfield development and a more varied housing types.</p> <p>Small for-sale flatted schemes are viable but the headroom is very limited. The difference in viability between the typologies is insufficient to justify a more complicated charging schedule. There is not sufficient evidence to suggest that CIL rate should be varied on the basis of the size of development.</p> <p>Evidence on sales values and rental values are set out in para 4.7 for sales values and 4.12 for rent values (Viability Evidence, March 2022)</p> <p>As set out in para 3.6 – 3.8 (Viability Evidence, March 2022) flatted development for sale and flatted development as build to rent have a different business model and consequential different viability.</p> <p>Older person's development has not be tested separately as part of this CIL review. ECC may considerer alternative rates for older person housing in any future review of CIL.</p> <p>No revision to proposed charges required.</p>
Kath Sidgwick Alphington Community Association	<p>There seems to be no suggestion of increase</p>	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Catherine Delafield	<p>Needs to be policed to ensure young working professionals will benefit i.e. not degenerating into student accommodation.</p>	<p>Comment noted.</p>



Name	Response	ECC comment
		<p>The Council is undertaking a separate review of the Article 4 area with regard to HMOs. The emerging Exeter Plan will also provide updated planning policy to manage development appropriately.</p> <p>No revision to proposed charges required.</p>
M Cottingham	Not sure why it shouldn't cost a bit, but presume you know why you've elected zero.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>No revision to proposed charges required.</p>
Anonymous	This is the type of housing that has the heaviest use on infrastructure. It promoted the highest density of population and as such increases the burden on local infrastructure. Surely there should be some levy to offset this?	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>For some types of infrastructure, flats may result in a less significant impact due to density and location – for example in relation to transportation. However, further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Michael Carter	Increase the rate to allow for better active travel infrastructure and more support for public transport. This is required to meet NetZero commitments. It is clear the council is not receiving enough income to ensure adequate provision for current developments. Private car use means we have increased congestion and pollution.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan. This will promote active travel and public transport in line with the Exeter Transport Strategy.</p> <p>No revision to proposed charges required.</p>
Anonymous	If flatted residential homes were of a decent size and affordable rent, unless there were exclusion of student occupation they would soon become further student accommodation. Young professionals would not be able to afford them.	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Anonymous	I feel that there should be some levy on this.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>No revision to proposed charges required.</p>
Beverley Little	The Developers should pay something although they will pass this onto their buyers	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p>

Name	Response	ECC comment
		No revision to proposed charges required.
Si Johns YMCA EXETER	YMCA Exeter can see the benefit of encouraging the creation of self-contained accommodation in the City Centre and how a zero rate on this type of development would accomplish that. We would hope that the City Council continue to ensure that there is provision in these developments for social housing at a fair percentage, in line with other developments outside of the city centre.	Comment noted.  The proposed CIL rates are based on viability evidence which assumes the continuation of current policy support for affordable housing with an emphasis on social rent.  Further planning policy to support affordable housing will be provided in the emerging Exeter Plan.  No revision to proposed charges required.
Mrs M Holding	Not sure why residential is charged and flats not??	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.  No revision to proposed charges required.
Mark (no surname provided))	Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.	Comment noted.  CIL is a charge on new development rather than a form of regular Council tax. It cannot be used to compensate for Council tax and the proposed revisions to the CIL rates will not affect Council taxes.  No revision proposed.
Simon Egan	This is likely to blight our future neighbourhood and City while failing to provide appropriate homes for young professionals, and that it would be very unwise to provide developers with this incentive	Comment noted.  The proposed CIL rates do not affect local planning policy. Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.  No revision proposed.
Ann Keen	In general a flatted development will be higher density than standard residential, and hence likely to have a greater impact on the surrounding area and put more of a strain on services. Hence this should have at least the same CIL than standard residential, and ideally higher.	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.  For some types of infrastructure, flats may result in a less significant impact due to density and location – for example in relation to transportation. However, further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.  No revision to proposed charges required.
Amanda Hesford	I am not clear, does this mean that student accommodation would not have any levy, if that is the case I disagree	Comment noted.

Name	Response	ECC comment
		<p>As part of these proposals, student accommodation would be charged a higher rate of CIL than under the current arrangements. This rate is higher than other residential development.</p> <p>No revision to proposed charges required.</p>
Anonymous	<p>Rate should be equal to or higher than residential rate and reflect the potential profits of the developer in determining the rate. There should be no exemption for these types of development as it still generates a community infrastructure need that the council needs to meet and fund. Fixed amount should be spent solely on the neighbourhood hosting any particular development. This should be ring-fenced.</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>One of the key principals behind CIL is that it enables the funding of infrastructure on a more strategic basis with s106 funding providing more site specific mitigation of development impact. 15% of CIL is usually made available for more community focused projects.</p> <p>For some types of infrastructure, flats may result in a less significant impact due to density and location – for example in relation to transportation. However, further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Robert Ellis	<p>The draft local plan outlines an aim for more brownfield development in Exeter and acknowledges that increased densities will be required- therefore there should be more flatted development occurring in Exeter in the future. Excluding an income stream from this significant quantum of development is a missed opportunity.</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>For some types of infrastructure, flats may result in a less significant impact due to density and location – for example in relation to transportation. However, further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Will Page	<p>Far too low. The ground floor of developments on flood plains, EG marsh Barton, will all fall under this, if my understanding is correct. This means that money will not be put aside for community use from this type of development.</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Jonathan Rowlatt	<p>There is a clear demand for additional homes within the city and a wider range of residential type and tenure. Flats allow for higher density development in appropriate locations and a more affordable option for purchasers, whilst achieving higher completion rates, helping the City meet its housing targets. Supporting such development through a zero CIL levy is a sensible approach</p>	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>

Name	Response	ECC comment
Ben Partridge	It doesn't seem fair that non-flatted residential has a levy. Surely everything or nothing should have the same levy.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development. No revision to proposed charges required.</p>
Emma Townsend	The inequality of charges for different residential types does not reflect the impact that each development will have on the city services. This will push developers towards choosing this type of developing from an economic reason, potentially leading to this being proposed in unsuitable areas. Rather than what fits best under the local plan.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>Further planning policy to support appropriate infrastructure requirements and development of high quality in appropriate locations will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Anonymous	Far too low, why should this be zero	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development. No revision to proposed charges required.</p>
Anonymous	Should be much higher	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development. No revision to proposed charges required.</p>
Anonymous	Assuming this is flats above retail? Why does this not raise a levi? All new households impact on local services.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development. No revision to proposed charges required.</p>
Stuart (no surname provided)	Should be the same as residential, why do they get a break?	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development. No revision to proposed charges required.</p>
Roger Oakford	How can a levy of £0 be workable?	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations). This evidence shows that flatted development is less viable than other forms of residential development.</p>

Name	Response	ECC comment
		No revision to proposed charges required.
Ian Harrison	Why no levy? I do not see the logic for a nil charge.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>No revision to proposed charges required.</p>
Chris Pope	It's not clear why this should be exempt from charges as it will have an impact on infrastructure needs	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations). This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>No revision to proposed charges required.</p>
Cheryl Freeman	A levy should be paid by all developers and higher than residential rates	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>No revision to proposed charges required.</p>
Stephen (no surname provided)	I expect these will just become additional "high quality student rentals" and hence do not see any reason why developers should be given a discount for an already highly profitable development. Single family homes should be levy free, not highly profitable rental developments.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that flatted development is less viable than other forms of residential development.</p> <p>Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Martin Redfern	The rate proposed for flats built for sale is nil, supposedly reflecting the "marginal viability for this form of development in Exeter" even though the viability assessment shows that medium-sized, moderately tall such schemes are not only viable, they are very profitable. Flat sale 3 yields £2,243,902 in developer profit. As new developments only have to be two units tall to qualify for this rate, perhaps we should soon expect a rash of applications to build maisonettes? These proposed rates gift large buffers in favour of the kinds of development the council wants to see and deliver itself for profit.	<p>Comment noted</p> <p>Small for-sale flatted schemes are viable but the headroom is very limited. The difference in viability between the typologies is insufficient to justify a more complicated charging schedule. There is not sufficient evidence to suggest that CIL rate should be varied on the basis of the size of development.</p> <p>Evidence on sales values and rental values are set out in para 4.7 for sales values and 4.12 for rent values (Viability Evidence, March 2022)</p> <p>As set out in para 3.6 – 3.8 (Viability Evidence, March 2022) flatted development for sale and flatted development as build to rent have a different business model and consequential different viability.</p> <p>No revision to proposed charges required.</p>

Name	Response	ECC comment
Councillor Diana Moore-Co-Leader Progressive Group	v). 6.Flatted residential should make a CIL contribution.	Comment noted v) The viability evidence and risk review suggests that flatted development is not able to support a CIL charge. No revision to proposed charges required.

## 5. Responses to the proposed rate for build to rent

Do you agree or disagree with the proposed build-to-rent rate?

	Number of Respondents	%
Agree	19	37
Disagree	33	63

Do you have any comments on the proposed build-to-rent rate?

Name	Response	ECC comment
John Yates	Why should landlords get a discount? Remember the £1 million (or was it more?) that ECC allowed a student home developer off on recent multi flat development? Can't recall - was it corruption? Family interests? who knows	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics. The proposals are for purpose build student accommodation to be a higher CIL rate.  As set out in para 3.6-3.8 (Viability Evidence March 2022) flatted development for sale and flatted development as build to rent have a different business model and consequential different viability.  No revision to proposed charges required.
Phyllida Brown	I am assuming that purpose built housing means houses rather than flats. If it means structures that exceed normal house height I would suggest the same differential and increasing levy depending on the number of storeys as indicated above.	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics. The proposals are for purpose build student accommodation to be a higher CIL rate.  No revision to proposed charges required.
Anonymous	This is not the tenure of choice for many in the UK, so it seems inevitable that a major shift in the psyche will be required to embrace renting in place of aspiration to own a home, if this kind of development is to be successful as part of the strategy to help solve the housing crisis. So much will depend on strong planning policy so that development of this kind is guaranteed to provide only good quality attractive accommodation, in suitable locations and at rents affordable to those who would not qualify for, and would not want, social	Comment noted.  The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.

Name	Response	ECC comment
	<p>housing, but simply cannot afford the rents demanded by the current trend of luxury build to rent. This type of development refers to the very quality, well-managed model that will not be affordable by, or desirable to, many. Hence CIL rate should not encourage applications to such an extent that the city is flooded with a type of housing that does not fulfil the most pressing needs.</p> <p>Unless the affordability (measured against 30% of the average income range of the wide middle section of the population), of this type of development is guaranteed (and I don't think it can be) there should not be any encouragement in the form of CIL rates below that of the basic residential rate.</p>	<p>Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Paul Layton	<p>Such a low CIL should only be applied to affordable/social housing developments. More expensive and luxury properties should incur a much greater charge.</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics. There are many forms of build to rent developments, the majority of which do not equate to luxury development. Affordable housing is exempt from paying CIL.</p> <p>The viability testing allowed for policy compliant affordable housing as set out in para 4.1 (Viability Evidence March 2022).</p> <p>No revision to proposed charges required.</p>
Stephanie Eaton McLaren	<p>We have previously commented that the NDSS should form the basis of dwelling sizes for the Flatted and BtR schemes. Therefore we disagree with how the testing has been undertaken by Three Dragons. National Planning Policy acknowledges the requirement for all types of residential schemes to help solve the housing crisis nationally. The government are fully supportive of BtR schemes. BtR schemes are popular with young professionals and families, offering 3 year tenancies, termed as 'family friendly' and are typically more tenure secure than other PRS units. BtR schemes offer high quality housing, professionally managed. Many offer good onsite amenities and have to be situated with access to good transport links. National Planning Policy states an expectation that BtR schemes should offer 20% affordable housing on site. However, a high CIL rate will impact the level of affordable units that can be provided within a scheme. BtR in the long term will assist in achieving policy goals. At the time schemes are viability tested (planning) many BtR schemes are not stabilised and there are massive up-front costs unless forward funding is obtained, which is not a given depending on size of scheme. With construction costs being high and shortages of labour well documented, a CIL rate of £50psm (indexed going forward) will be another big financial impact which could also deter investors due to increased financial risk. We consider this rate will deter BtR from coming forward and shows an unfair bias against such schemes given a zero rate proposed for residential flatted schemes to buy. Given the limited amount of mortgage product available for traditional residential for sale in the current climate, BtR should be encouraged to come forward. Many people commute from Torquay to Exeter by road and the provision and availability of high quality rented accommodation in central and suburban areas could serve to minimise journeys and congestion rather than carry on with road upgrades which continue to encourage people to use their cars. In terms of policy fulfilment this addresses sustainability policy (to reduce the level in growth of car usage) with regard to reducing car journeys. It is unclear why BtR is not treated the same as Residential flatted. BtR are now established residential schemes nationwide, providing high quality homes and it should be noted the government support this residential type. The testing evidence base needs to be transparent.</p>	<p>Comment noted</p> <p>NDSS is an optional standard, not yet adopted by the council. However as set out in para 4.1 – 4.3 (1 (Viability Evidence, March 2022) the market unit sizes are based on recent delivery with regard to NDSS.</p> <p>The commentary regarding the specific characteristics of build to rent is noted. This is partly why build to rent is separately tested.</p> <p>The viability testing allowed for policy compliant affordable housing as set out in para 4.1 (Viability Evidence March 2022).</p> <p>Delivery risks are considered as set out in para 6.2 &amp; 6.4 (Viability Evidence March 2022) in terms of setting the CIL rate</p> <p>No revision to proposed charges required.</p>
Annette Plaut	<p>Once again, in areas in close proximity to the University, this low build-to-rent rate is just an investment charter for new-build student properties in city areas already well out of community balance with large numbers of student properties already.</p>	<p>Comment noted.</p> <p>Build to rent schemes are unlikely to be appropriate for student accommodation as a result of the often long tenancies associated with this form of development. A much higher CIL rate is proposed for purpose built student accommodation.</p> <p>No revision to proposed charges required.</p>

Name	Response	ECC comment
Gert Vonhoff Exeter Civic Society	<p>ECS: This should be seen in context with Flatted Residential, we suggest a slightly higher rate than currently suggested.</p> <p>For two of the three types of Built to Rent (see 5.6, Viability Evidence), the CIL headroom is substantially higher than £50 per sqm: 150 units £313, 350 units 5 storey £359. Only the 305 units, 10 storey development is below this rate with £53; our suggested slightly higher rate would disincentivise from this model, which will be problematic because of its height for most of the Exeter sites.</p> <p>Further reasons for setting the rate higher are:</p> <ol style="list-style-type: none"> <li>1) Built to Rent should be seen in context with Flatted Residential and Residential a rate between both will position it in the middle between both rates.</li> <li>2) This will be flatted property for rent, thus generally a lucrative market segment. This should make it a viable option for Exeter, too. The argument that the Exeter market is immature for this and therefore a cautious approach to be followed, we find misleading.</li> <li>3) These future new homes are expected to be low car ownership, and as a consequence they generate a need to significantly upgrade the walking and cycling infrastructure as well as public transport</li> </ol>	<p>Comment noted.</p> <p>The viability evidence does set out a higher potential headroom for some build to rent typologies. However as set out in para 3.6 (Viability Evidence, March 2022), build to rent is a new form of residential development for Exeter and as acknowledged in para 6.2 &amp; 6.4 (Viability Evidence, March 2022) there are delivery risks, which has led ECC to set the CIL rate as proposed.</p> <p>No revision to proposed charges required.</p>
Greg Cornish-MRICS-Director (Land)	<p>Build to rent (BtR) schemes cost the same, if not more, to construct than typical residential flatted schemes. However, values of BtR schemes are most commonly lower than 'for sale' schemes (management costs, rent and yield dynamics etc.), which means the pot from which to pay for planning obligations, CIL, build costs, land and profit is smaller.</p> <p>The financial viability of BtR schemes is therefore strained even further. The delivery of good quality, professionally managed BtR schemes in the City will therefore be harder to achieve, especially if the Council remain intent on requiring on-site affordable housing as well. Something will need to give if such schemes (which add to the variety of housing stock in the City) are to be delivered in the future.</p>	<p>Comment noted.</p> <p>Whilst we agree that the construction costs per sqm are the same as for sale, for equivalent height development, we have also tested a taller scheme with higher per sqm costs as well as larger allowances for communal space (para 4.3 &amp; Table 4.8 Viability Evidence March 2022). It should also be noted that the costs for affordable housing within sale flatted schemes is higher than the affordable housing requirement in build to rent schemes (Table 4.1 Viability Evidence March 2022).</p> <p>No revision to proposed charges required.</p>
Catherine Delafield	Again; must be suited and costed for young professionals.	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
M Cottingham	Seems a very nominal fee for a "build to rent" enterprise. Why not higher?	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>
Michael Carter	Increase the rate to allow for better active travel infrastructure and more support for public transport. This is required to meet NetZero commitments. It is clear the council is not receiving enough income to ensure adequate provision for current developments. Private car use means we have increased congestion and pollution.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan. This will promote active travel and public transport in line with the Exeter Transport Strategy.</p> <p>No revision to proposed charges required.</p>
Anonymous	Too low. looks like it could include co-living accommodation	Comment noted.



Name	Response	ECC comment
		<p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics. Build to rent is a different form of development to co-living.</p> <p>No revision to proposed charges required.</p>
Anonymous	Build to rent is too expensive for young workers needing to rent and would likely soon become student accommodation, as management would want as high return as possible.	<p>Comment noted.</p> <p>Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Carolyn Harries	Can the Council ensure that the charge does not increase the rents charged? If not, then I would not approve of the increased CIL as renters are already being squeezed unfairly.	<p>Comment noted.</p> <p>The CIL charges are paid by the developer and are separate from the rents charged to the tenants. The viability evidence shows that build to rent development can afford to pay the proposed CIL rate in the context of existing expected rental income.</p> <p>No revision to proposed charges required.</p>
Beverley Little	We need more development for young single adults who are having to pay extortionate rents so can't save to get a mortgage	<p>Comment noted.</p> <p>Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Mark (no surname provided)	Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.	<p>Comment noted.</p> <p>Purpose built student accommodation is a different form of development to build to rent and is subject to a different proposed CIL rate.</p> <p>No revision to proposed charges required.</p>
Simon Egan	This is likely to blight our future neighbourhood and City while failing to provide appropriate homes for young professionals, and that it would be very unwise to provide developers with this incentive	<p>Comment noted.</p> <p>The proposed CIL rates do not affect local planning policy. Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Ann Keen	It's not clear to me why this should attract a lower CIL than standard residential. Should be the same, or maybe higher as it's not clear to me that we particularly want to attract this sort of development?	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics. An element of build to rent development</p>

Name	Response	ECC comment
		<p>in Exeter will help to provide greater variety of residential development, helping to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Anonymous	<p>Rate should be equal to or higher than residential rate and reflect the potential profits of the developer in determining the rate. There should be no exemption for these types of development as it still generates a community infrastructure need that the council needs to meet and fund. Fixed amount should be spent solely on the neighbourhood hosting any particular development. This should ring-fenced</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.</p> <p>One of the key principles behind CIL is that it enables the funding of infrastructure on a more strategic basis with s106 funding providing more site specific mitigation of development impact. 15% of CIL is usually made available for more community focused projects.</p> <p>Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Robert Ellis	<p>This type of development is becoming more popular, setting a lower rate than standard residential is a missed funding opportunity.</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>
Will Page	<p>Buy to rent should be higher than residential for purchase.</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>
Jonathan Rowlatt	<p>A CIL rate lower than standard residential is supported, as this will encourage a greater diversity of residential types, better meeting the needs of the community and providing an increased number of new homes for all ages</p>	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Ben Partridge	<p>I need context. How much has CIL raised in the past? What is the average levy? How does £50/m<sup>2</sup> translate into the overall cost of a development? Unfortunately with all levies the developer will just pass them onto the eventual tenants. A new way should be found to raise money that doesn't penalise the final occupier.</p>	<p>Comment noted.</p> <p>More than £24m of CIL has been received since its implementation. The potential CIL rates are calculated on the basis of locally-specific viability evidence which determines that proposed CIL rates are affordable for development. CIL charges are not passed to final occupiers.</p> <p>No revision proposed.</p>
Emma Townsend	<p>Same comment as before re the inequality of charges.</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p>

Name	Response	ECC comment
		<p>Further planning policy to support appropriate infrastructure requirements and development of high quality in appropriate locations will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Anonymous	Far too low why less than residential	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>
Anonymous	Should be higher	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Anonymous	Should be a lot higher to reflect the issues it's causing local people struggling to rent or buy a house. BTR always charge excessive rents.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence This evidence shows that build to rent development has its own viability characteristics. An element of build to rent development in Exeter will help to provide greater variety of residential development, helping to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Anonymous	Rented accommodation other than property built for social housing should have normal CIL rates	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics. Affordable housing is exempt from paying CIL.</p> <p>No revision to proposed charges required.</p>
Stuart (no surname provided)	No, these vultures need to pay a lot more - they are already a parasitic model, they need to contribute more to the local infrastructure as they are already extracting from it.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations). This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>
Ian Harrison	<p>This is too low.</p> <p>I assume the description would be similar to the big flat developments we all are very well aware of in the Newton / St Sidwells St. areas? These blocks are major commercial concerns and are owned by large investment companies. The rents from the occupants often do not stay in Exeter.</p> <p>That being the case the proposed levy is far too low.</p> <p>Again, what is this proposed levy level based on - what comparables? My immediate reaction is that it should be x 2!</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations). This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>

Name	Response	ECC comment
Dr David Treharne	Don't think a binary choice is appropriate. Notwithstanding question below The Council needs to make provision for key worker accommodation at a differentiated rate.	<p>Comment noted.</p> <p>Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Chris Pope	It is pragmatic to have a lower rate for build to rent but only if the rents are affordable - the current definition is 80% of market value but this is inadequate definition as market value does not relate to percentage of household average income. In Exeter we have high rents and a low household income which means so called "affordable" rents generally take a large proportion of household income.	<p>Comment noted.</p> <p>The proposed CIL rates will not affect planning policy requirements for affordable housing.</p> <p>No revision to proposed charges required.</p>
Cheryl Freeman	Should be higher than residential rates	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>
Simon Egan	Should be higher if it's for student housing	<p>Comment noted.</p> <p>Build to rent is a different form of development to purpose built student accommodation.</p> <p>No revision to proposed charges required.</p>
Debbie Croxford	We desperately need more rental stock	<p>Comment noted.</p> <p>Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Mark Cole	These should be done away with completely	<p>Comment noted.</p> <p>Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Stephen (no surname provided)	I am disappointed that you would charge less CIL for build to rental properties. We need people to be able to afford homes, not perpetuate and support the already booming and lucrative rental market.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. This evidence shows that build to rent development has its own viability characteristics.</p> <p>No revision to proposed charges required.</p>
Alex Cave (JLL) Blocwork LLP	The revised CIL charging schedule will enable uses such as flatted development (for sale), flatted development Build to Rent, and Co-living and Purpose-built student accommodation to be specifically	<p>Comment noted.</p>

Name	Response	ECC comment
	considered and subject to CIL at the rates proposed. This will add new categories to the range of uses which will be liable for CIL and enable the specific requirements of uses, such as Build to Rent, to be considered, rather than being included within the wider Residential classification. This principle of this change is welcomed by our client.	No revision to proposed charges required.
Councillor Diana Moore-Co-Leader Progressive Group	vii) 8.The rates for Build to Rent and Flatted development should be reviewed (upward), with a view to a reduction in the levy if more 20% of units are affordable or social housing.	<p>Comment noted.</p> <p>vii) The CIL is calculated on the basis of policy compliant affordable housing.</p> <p>No revision to proposed charges required.</p>

## 6. Responses to the proposed rate for purpose built student accommodation

Do you agree or disagree with the proposed PBSA rate?

	Number of Respondents	%
Agree	35	63
Disagree	21	37

Do you have any comments on the proposed PBSA rate?

Name	Response	ECC comment
John Yates	Why should landlords get a discount? Remember the £1 million - or was it more? That ECC allowed a student home developer off on recent multi flat development? Can't recall - was it corruption? Family interests? who knows	Comment noted.  The proposed CIL rates are based on viability evidence. The proposals are for purpose built student accommodation to be a higher CIL rate than wider residential development.  No revision to proposed charges required.
Peter Chamberlain	It is important that the PBSA levy rate is increased, as proposed, in order to avoid the excessive focus on this type of development in parts of the City which are in the general proximity of the University. These areas, particularly St. James, have been blighted by this development, which has dominated every available development / re-development site, encouraged by the previously low CIL rate levied for this class of development.	Comment noted.  No revision to proposed charges required.
Phyllida Brown	The scale, mass and height of the PBSA recently built in central Exeter and St James has been seriously disproportionate to surroundings and has not solved the 'problem' of houses being HMO for students. Therefore I think the increased levy is appropriate because it might incentivise more considered, proportionate future developments of PBSA on a smaller scale. As with previous responses I ask the council also to consider a height-related increase in the levy to disincentivise anymore high PBSA being built.	Comment noted.  The proposals are for purpose built student accommodation to be a higher CIL rate than wider residential development. The proposed CIL rates are based on viability evidence which takes into account the potential form of development.  No revision to proposed charges required.
Anonymous	Over the last decade or so, the balance has been far too much in favour of student accommodation, with the impact of preferential CIL rates exemplifying the importance of getting these right. The current structure, providing economic encouragement for PBSA, must end. Those that are completed charge extortionate rent beyond the reach of many students and their families. Rumoured occupancy rates reflect this. Also many consented PBSA are yet to be built.  The policy espoused by ECC for too long has failed. Encouraging PBSA development through low CIL rates has not resulted in the anticipated return of HMOs to residential family housing stock. At the same time the city-scape has been blighted, a source of much regret to so many living across Exeter and environs, whose pride in the City has taken a severe knock. The CIL rate should greatly exceed that of all forms of residential accommodation at rents affordable for nurses, teachers and many others who work in Exeter and need and deserve good quality accommodation which they are proud to make their home. I suggest £150 is too low.	Comment noted.  The proposals are for purpose built student accommodation to be a higher CIL rate than wider residential development. The proposed CIL rates are based on viability evidence.  The wider approach to meeting housing requirements and considering the need for purpose built student accommodation will be provided in the emerging Exeter Plan.  No revision to proposed charges required.
Paul Layton	This is welcomed but far too low a charge. PBSA has decimated the fabric of communities in proximity to the university (e.g. St James) and further developments should be deterred by the application of the maximum charge allowable.	Comment noted.  The proposals are for purpose built student accommodation to be a higher CIL rate than wider residential development. The proposed CIL rates are based on viability evidence.  No revision to proposed charges required.

Name	Response	ECC comment
Stephanie Eaton McLaren	We consider the PBSA values for studios tested was too high, this means that the CIL is too high in our opinion. PBSA are lower rented schemes than PRS schemes. The testing by Three Dragons was unclear with regard the assumed transport accessibility for PBSA Schemes. We would like to see how the densities have been calculated. Testing evidence needs to be transparent.	<p>Comment noted.</p> <p>The PBSA values are set out in para 4.14 (Viability Evidence, March 2022) and were based on 8 PBSA schemes in Exeter, so based on actual values. This exercise included specific analysis on both studio and cluster forms of accommodation.</p> <p>The evidence is transparent. Table 4.9 (Viability Evidence, March 2022) sets out the allowance for s106, which would include mitigating for transport and other required infrastructure. Para 4.35 (Viability Evidence, March 2022) sets out that this was based on recent s106 agreements. Para 3.9 (Viability Evidence, March 2022) sets out that the typologies, including density is based on 8 recent PBSA schemes.</p> <p>No revision to proposed charges required.</p>
Annette Plaut	This is well overdue. PBSA is at long last being proposed a CIL rate higher than residential rates. It could even be higher than £150/sq. m in my opinion. The horse has unfortunately already bolted - like Article 4, this is being instigated well after the damage has been done - once again too little too late.	<p>Comment noted.</p> <p>The proposals are for purpose built student accommodation to be a higher CIL rate than wider residential development. The proposed CIL rates are based on viability evidence.</p> <p>The Council is undertaking a separate review of the Article 4 area with regard to HMOs.</p> <p>No revision to proposed charges required.</p>
Gert Vonhoff Exeter Civic Society	<p>ECS: we welcome the increase and think this could be even substantially higher.</p> <p>For all three types of PBSA tested (see 5.7., Viability Evidence), the CIL headroom is substantially higher than £150 per sq.: 40 units £669, 100 units £584, 250 units £508. ECC should make more use of this, because:</p> <ol style="list-style-type: none"> <li>1) PBSA is established in the Exeter market; it has become a very lucrative segment of the market.</li> <li>2) Student accommodation generates community infrastructure needs. As students do not pay Council Tax, this is the main means for development to contribute towards the costs of infrastructure associated with such developments, although we have seen little off-site infrastructure to support any of the recently built large PBSA sites, such as improved cycle routes connecting these blocks to the university sites.</li> <li>3) As the market share of PBSA within the city has increased disproportionately in some areas of the city, ECS would like to see a brake to further increases of this sector - in line with many citizens who see their city emptied out during non-term time. A healthier balance between PBSA and family accommodation within the city centre is more likely to result in a more integrated student population, an aim of the Exeter Plan. The way CIL is going to be spent needs to be linked closer to the areas which saw the substantial increase of student accommodation, with the aim to counter-balance some of the effects this had on the non-transient population. Whilst ECS supports the provision of PBSA on the university campus, is it time to introduce some planning policies to restrict the intensity of PBSA in other parts of the city, in the same way that HMOs are restricted in certain areas? Or consider some control through CIL charging by location?</li> <li>4) We, however, recognise that further efforts need to be made to stop the conversion of houses in HMOs and that with a still growing university this might mean a further increase in PBSA.</li> <li>5) PBSA CIL rates in local cities do not seem to have been revised for some time (Bristol, Plymouth), and therefore cannot provide guidance. Revised rates in Camden (Feb 2020) and Lambeth (Sep 2021) demonstrate that other councils charge increased rates of CIL. See <a href="https://www.planningresource.co.uk/article/1121218/cil-watch-whos-charging-what">https://www.planningresource.co.uk/article/1121218/cil-watch-whos-charging-what</a> , accessed 17 Jan 2023</li> </ol>	<p>Comment noted.</p> <p>A range of factors is considered when setting the CIL rates (para 6.2 Viability Evidence, March 2022) including the PPG requirement for a viability buffer and a judgement about reasonableness. The proposed CIL rates take these factors into account, see para 6.5 (Viability Evidence, March 2022).</p> <p>CIL rates are based on the viability of development rather than infrastructure requirements.</p> <p>No revision to proposed charges required.</p>
Councillor Diana Moore-Co- Leader Progressive Group	Increased rate for Purpose Built Student Accommodation (PBSA) is welcomed.	Comment noted.

Name	Response	ECC comment
		No revision to proposed charges required.
Catherine Delafield	Needs to be managed to avoid any more over-saturation.	<p>Comment noted.</p> <p>The wider approach to meeting housing requirements and considering the need for purpose built student accommodation will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Rachel (no surname provided)	The development of PBSA needs to be tasked to provide proper remuneration for the impact on local facilities. It has become unsustainable in a small city like Exeter	<p>Comment noted.</p> <p>The wider approach to meeting housing requirements and considering the need for purpose built student accommodation will be provided in the emerging Exeter Plan. The plan will also support appropriate infrastructure requirements.</p> <p>No revision to proposed charges required.</p>
M Cottingham	These places are money making machines and the city is flooded with them. Make the fee far higher.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence.</p> <p>No revision to proposed charges required.</p>
Anonymous	This housing is pervasive throughout Exeter and has become a standing joke - there is so much of it and the sheer density creates issues. The developments are purely commercial and for-profit. It also removes housing opportunities for workers and local families. This charge should be higher	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence.</p> <p>The wider approach to meeting housing requirements and considering the need for purpose built student accommodation will be provided in the emerging Exeter Plan.</p> <p>No revision to proposed charges required.</p>
Michael Carter	Increase the rate to allow for better active travel infrastructure and more support for public transport. This is required to meet NetZero commitments. It is clear the council is not receiving enough income to ensure adequate provision for current developments. Private car use means we have increased congestion and pollution.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan. This will promote active travel and public transport in line with the Exeter Transport Strategy.</p> <p>No revision to proposed charges required.</p>
Anonymous	Should be higher for student accommodation as the city loses out on rates; PBSAs should NOT BE PERMITTED in areas already saturated with student accommodation to the detriment of the local community.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence.</p> <p>The wider approach to meeting housing requirements and considering the need for purpose built student accommodation will be provided in the emerging Exeter Plan.</p>



Name	Response	ECC comment
		No revision to proposed charges required.
Beverley Little	Increase to £200 Too much student accommodation in Exeter with more in the pipeline	Comment noted.  The proposed CIL rates are based on viability evidence.  The wider approach to meeting housing requirements and considering the need for purpose built student accommodation will be provided in the emerging Exeter Plan.  No revision to proposed charges required.
Si Johns YMCA EXETER	YMCA Exeter wonders if developers would not be more likely to build large blocks of "Co-Living" accommodation and then heavily market these to students to avoid the higher PBSA rates?	Comment noted.  The planning consents and associated monitoring for co-living schemes would restrict the occupiers of the development so that they do not become student accommodation in all but name.  No revision to proposed charges required.
Andrew Thomson	Should be £300	Comment noted.  The proposed CIL rates are based on viability evidence.  No revision to proposed charges required.
Mark (no surname provided)	Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.	Comment noted.  CIL is a charge on new development rather than a form of regular Council tax. The proposed revisions to the CIL rates will not affect Council taxes.  No revision to proposed charges required.
Amanda Hesford	could be higher, only issue is if this is passed on to the renter	Comment noted.  The proposed CIL rates are based on viability evidence. The CIL charges are paid by the developer and are separate from the rents charged to the tenants.  No revision to proposed charges required.
Anonymous	Rate should be much much higher than residential rate and reflect the potential profits of the developer in determining the rate. Host educational institution should match the rate of the developer (if different) to show good faith and respect to host neighbourhood. These types of development generate a significant community infrastructure need that the council needs to meet and fund  A higher fixed amount should be spent solely on the neighbourhood hosting any particular development. This should ring-fenced	Comment noted.  The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).  Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.  No revision to proposed charges required.
David Blagden Labour Party - Duryard and St James Ward Candidate for Exeter City Council, 2023	As an ECC candidate for Duryard and St James Ward, it is clear to me from my canvassing and correspondence with local residents that the ward needs much better amenities. Since DSJ residents also bear an outsized share of the downsides from further student residential development, this substantial uplift in CIL as applied to PBSA will be welcomed by the residents - and I hope you will ensure that, if the uplift is approved,	Comment noted.

Name	Response	ECC comment
	<p>a generous share of the corresponding revenue is allocated to Duryard and St James, where local community amenities are unfortunately not yet at the level available in many other wards. Furthermore, as an employee of the University myself, I know that staff/students themselves resident/working in the ward would also benefit from improved local amenities. As such, additional CIL expenditure within DSJ could represent a 'win-win' for all parties (i.e. established local residents would benefit, offsetting some of the downsides from further PBSA development, but the University community could also benefit, since the CIL such developments paid would be reinvested in improving the character of the immediate local area, making it a better living/working environment for staff and students). Many thanks for your time and consideration.</p>	<p>Further planning policy to support appropriate infrastructure requirements and development of high quality will be provided in the emerging Exeter Plan.</p> <p>A proportion of CIL (either 15% or 25%) is made available for more community focused projects. This is managed via the Exeter Grants Programme.</p> <p>No revision to proposed charges required.</p>
Ben Partridge	<p>I need context. How much has CIL raised in the past? What is the average levy? How does £150/m<sup>2</sup> translate into the overall cost of a development?  Unfortunately, as with all levies the developer will just pass them onto the students. A new way should be found to raise money that doesn't penalise students. It doesn't seem fair that PBSA has the highest levy. Why doesn't all development attract the same amount?</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure or the amount of infrastructure that may be required (as is required by the Regulations). Each development type has a different rate because of the different viability. The proposed rate is considered viable and therefore the charge should not be passed onto the occupants (students in this case). For reference, the City Council has raised more than £24m in CIL since it was implemented.</p> <p>No revision to proposed charges required.</p>
Anonymous	Far too low	<p>Comment noted.</p> <p>The proposed rate for purpose built student accommodation (£150/sqm) is a significant increase from that charged currently (£63.39/sqm).</p> <p>The proposed CIL rates are based on viability evidence.</p> <p>No revision to proposed charges required.</p>
Anonymous	<p>Should be much higher as Exeter is being overrun by new student accommodation, when our emergency services staff struggle to find affordable rent/homes. More affordable places should be built before even more student accommodation which then lies empty at certain times of the year (school hols).</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations). Further planning policy to support affordable housing will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Roger Oakford	<p>The proposed levy of £150 is inadequate, it should be at least doubled to reduce the amount of student accommodation being forced upon the population of Exeter</p>	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision to proposed charges required.</p>
Ian Harrison	<p>Subject to a clear statement that there are similar charges in other cities in the UK.</p>	<p>Comment noted.</p>

Name	Response	ECC comment
		<p>The proposed CIL rates are based on local viability evidence as opposed to being set in comparison with equivalent rates elsewhere.</p> <p>No revision to proposed charges required.</p>
Dr David Treharne	Again, binary choice is inappropriate. A flexible approach is needed dependent on the location of the PBSA	<p>Comment noted.</p> <p>The proposed CIL rates are based on local viability evidence. It would be very challenging to set multiple different rates for specified development types based on different areas of the city.</p> <p>No revision to proposed charges required.</p>
Chris Pope	Student accommodation is very profitable for developers and has for too long been subsidised by a low CIL	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Cheryl Freeman	Should be X3 rate of residential but preferably not build any more.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision to proposed charges required.</p>
Simon Egan	Should be much higher.	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Debbie Croxford	The rates are fair	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Stephen (no surname provided)	If anything, this should be even higher. I can't imagine this would ever be a hindrance to any potential development, given how lucrative student rentals are.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence.</p> <p>No revision to proposed charges required.</p>

## 7. Responses to the proposed rate for co-living

Do you agree or disagree with the proposed co-living rate?

	Number of Respondents	%
Agree	18	35
Disagree	33	65

Do you have any comments on the proposed co-living rate?

Name	Response	ECC comment
Ian Hodgson	This will become PBSA under a different name and should be charged the same as PBSA.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence.</p> <p>No revision to proposed charges required.</p>
John Yates	Sounds like much needed accommodation but I will disagree if it is provide by Richard Branson et al.	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Peter Chamberlain	<p>Although the Co-living concept appears to be desirable, there is already evidence (through recent planning applications) of this category being used to facilitate new development even though they are extremely unlikely to achieve their stated objectives. This building category is now being used as a substitute for PBSA. This will be, inappropriately, encouraged by this low CIL rate. This is likely to result in a perpetuation of the problems previously experienced with excessive PBSA development in parts of the City in close proximity to the University. This rate needs to be increased to minimise this risk.</p>	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision to proposed charges required.</p>
Phyllida Brown	<p>I strongly disagree with the very low proposed rate for co-living which in my view appears to be an invitation to developers to incentivise very large developments. I understand that there is a housing shortage but i am concerned that co-living units are not a realistic solution. I am aware that we have only two such developments currently in Exeter but I have some knowledge of young adults' attitudes to them in other cities. Why, other than developers' desire to maximise income per m2, do these developments need to be as big, or bigger, than the PBSA they are effectively replacing in all but name? The scale of the Heavitree development is strikingly large, and I am aware of another proposal for a co living development near to my home that if approved would be on a similar scale but with even more impractical road access. There is no evidence yet that such co living developments would actually be chosen by the young professionals for whom they are intended. Young professionals who I have spoken to have stated to me that they would consider such accommodation far too expensive; and there are concerns, in my view justifiable, that these units would in fact function as PBSA in all but name. I am very concerned that the council would seem to be going out of its way to invite developers to build these instead of PBSA. As a citizen who has already seen multi-storey PBSA radically change my neighbourhood and impact on many features of life in that neighbourhood, I believe that the proposed co-living rate should be the same as that for PBSA, not less than £150 (indexed) and (as above) with strong disincentives</p>	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>Further planning policy to support development quality will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community. Co-living is likely to form an element of this mix.</p>

Name	Response	ECC comment
	to exceed 3 storeys. Tall buildings block daylight for the rest of us; and at night they provide light pollution, sound pollution with their a/c and fans etc. They should not be imposed on residential neighbourhoods. Smaller developments (lower and with smaller footprints) would likely be more attractive to the target market, and distinguish them from the PBSA already in place.	No revision to proposed charges required.
Anonymous	<p>I would urge a radical rethink over the proposed preferential rate. This is not the answer. People are not so easily taken-in; any balanced research into Co-Living development reveals that it is PBSA by another name, for short term accommodation that appeals to developers and investors as it is so lucrative. Surely this indicates that this model is not a good deal, even for those seeking a very short term home. Such development is not well-enough tested for any authority to be wise in offering a preferential CIL rate.</p> <p>In Exeter there are no completed examples and any claim that such development will provide much needed accommodation for young professionals etc., is debunked by the publicity material for the unfinished Gorge, Gladstone Road on University Living. Explicitly described only as student accommodation, and with rent starting from £936 per month, this is proof that even if it were to welcome non-students, they would need a minimum monthly salary of £3120 to be considered able to afford the cheapest rooms. How many of the young graduates and professionals seeking a place to call home in Exeter, and who might consider this kind of accommodation, have a salary of over £37,000 pa? Is it likely that the few who do, would choose to return to living in student-style accommodation? Those people who are advocates of this model, would be wise to consider these points and to recognise it is insufficiently tested. It is hugely premature to set such a preferential rate for such an unknown in Exeter, especially when the Gorge illustrates what so many fear.</p> <p>It would be to repeat the mistake with PBSA when CIL was introduced in Exeter, if Co-living development were now to be encouraged with a CIL rate preferential over other forms of residential development and it would not make any sense to make it lower than for PBSA. In addition, as both of these forms of development are publicised to investors as being very lucrative, there should be absolutely no need to incentivise with the CIL structure. On the contrary, there is surely a strong case for a higher rate for these lucrative types of development. Let's encourage development that fits ECCs Liveable Exeter vision and provides good quality homes at rents that can truly be afforded by the majority of Exeter's young workforce, and who are not looking simply for a short term alternative to a hotel, for their temporary accommodation.</p>	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>Further planning policy to support development quality will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community. Co-living is likely to form an element of this mix.</p> <p>No revision to proposed charges required.</p>
Paul Layton	<p>If Co-Living were to provide truly affordable housing then a relatively low rate of CIL would be justifiable but the evidence is that it will be PBSA by another name and so should be treated similarly.</p>	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision to proposed charges required.</p>
Stephanie Eaton McLaren	<p>We have previously mentioned that the testing by Three Dragons was unclear with regard the assumed transport accessibility for Co-Living Schemes. We would like to see how the densities have been calculated for Co-Living schemes. Co-Living Schemes provide shorter letting periods than Build to Rent and provide residential living centred around sharing. Young professionals who want city centre living benefit from Co-living as it provides access to areas where they may not be able to buy but provides plenty of other benefits. Not only young professionals enjoy Co-living but single people and those who require a short to mid-term letting period, who, for example, are between market sale homes, due to renovations or having to move quickly due to the terms of completion. It also caters for those who need to work in a location for a short period of time and have no intention of making a permanent move. Some people may want to rent but can't afford classic flat or BTR unit so need something cheaper and more affordable. The most significant thing that Co-living provides is company, for single people where everything is on-line this provides the opportunity to create community and for people to build friendships. This is a residential model that provides tangible community benefits and is generally provided</p>	<p>Comment noted.</p> <p>Table 4.9 (Viability Evidence, March 2022) sets out the allowance for s106, which would include mitigating for transport and other required infrastructure and para 4.35 (Viability Evidence, March 2022) sets out that this was based on recent s106 agreements.</p> <p>Para 3.11 (Viability Evidence, March 2022) sets out that the typologies, including density is based on the two permitted schemes.</p>

Name	Response	ECC comment
	<p>at a lower rent than other PRS models. However a high and biased CIL rate will deter these schemes from coming forward. Again, like BtR, the challenges now are around high construction costs, which again are front loaded regarding development of these schemes. Co-Living, like BtR, is modelled in a similar way with a longer term view taken on investment. From a social and environmental standpoint, they can serve to mitigate high levels of inward commuting and heavy car reliance thus delivering policy benefits from other areas of the Local Plan through addressing topics like Sustainability. They also address population growth and provide decent homes. It is unclear why these schemes are not treated the same as residential flatted. The Co-Living market is not established in Exeter yet and any provider would need to establish the market. A high CIL Rate will not be conducive to Co-Living schemes coming forward and will also impact the level of affordable rented units being included on the development negatively.</p>	<p>A range of factors is considered when setting the CIL rates (para 6.2 Viability Evidence March 2022) including the PPG requirement for a viability buffer and a judgement about reasonableness. The proposed CIL rates take these factors into account, see para 6.6.</p> <p>In general terms, further planning policy will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community. Co-living is likely to form an element of this mix.</p> <p>No revision to proposed charges required.</p>
Annette Plaut	<p>I strongly object to this low co-living rate of just £50/sq. m, especially compared to the PBSA rate of £150/sq. m (It is also lower even than the proposed residential CIL rate of £80/sq. m.) as it will just mean that developers will apply for planning permission for co-living new-builds instead of PBSA, but these will end up only accommodating students, i.e. these are just PBSA in all but name.</p> <p>A co-living housing unit is similar in size to a PBSA housing unit - less than half the size of the minimum housing space standard of 37sq m for a one person dwelling. It only differs from PBSA in that it is marketed to a wider population than just students, but it will end up predominantly appealing to students, especially considering the extortionate rental rates of around £1000 pcm that are being proposed for such accommodation already approved in Exeter.</p>	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision to proposed charges required.</p>
Gert Vonhoff Exeter Civic Society	<p>ECS: This should be related to or preferably the same as PBSA, but substantially higher than suggested in this review.</p> <p>For all three types of Co-living (see 5.8, Viability Evidence), the CIL headroom is substantially higher than £50 per sqm: 40 units £343, 100 units £242, 250 units £140. Setting the rate higher than suggested in this review will disincentivise the larger units Co-living developments, which will benefit the social cohesion within the development (occupants will get to know each other more easily) and it can improve the links to the neighbourhoods (as a smaller structure will be seen as less alien).</p> <p>Further reasons for setting the rate higher are:</p> <ol style="list-style-type: none"> <li>1) Though this market segment is relatively new for Exeter, the increase in planned projects is substantial; we therefore would not see this as an immature market for Exeter. It seems that developers see this market as lucrative and worthwhile.</li> <li>2) The viability assessment for the CIL review had very few examples on which to base calculations. The recent applications provide further examples and evidence of the increasing popularity and presumably profitability of this type of development for developers.</li> <li>3) A low rate might result in an over-concentration of a single type of accommodation, which will attract a transient community and thus not result in creating more balanced communities. At current rents Co-living is not much of a steppingstone to owning a property and could result in a great number of young single professionals not being able to save to buy a home and establish themselves fully in the city.</li> <li>4) ECS expects a certain overlap between Co-living and PBSA, especially should Co-living with its relatively high rent costs not attract enough specific occupants. In future both segments might merge into each other. A CIL rate closer to that of PBSA would help to close a potential loophole, developers otherwise might use to build student accommodation in disguise.</li> <li>5) A rate slightly lower than that for PBSA reflects the fact that occupants will have to pay Council Tax in Co-living accommodation and therefore support the city infrastructure.</li> <li>6) The last point of the commentary under 5.8 does not read valid, as table 3.1 (p. 12) shows 500 units per net ha for all three models, and equally a 5-storey height for all of them.</li> </ol>	<p>Comment noted.</p> <p>A range of factors is considered when setting the CIL rates (para 6.2 Viability Evidence March 2022) including the PPG requirement for a viability buffer and a judgement about reasonableness. The proposed CIL rates take these factors into account, see para 6.6.</p> <p>At the time of the evidence base no co-living schemes were operational in Exeter and it is therefore very much an immature market. Whilst schemes have been permitted and it is understood that there are proposals for further co-living schemes these have yet to be built or tested within the market.</p> <p>The rates are set on the basis on para 6.2 (Viability Evidence March 2022) and not according to council tax receipts.</p> <p>The drafting of the final bullet in para 5.8 (Viability Evidence, March 2022) is incorrect and should have referred to overall size and development period rather than height.</p> <p>Further planning policy will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community. Co-living is likely to form an element of this mix in the context of the need for balanced communities.</p>

Name	Response	ECC comment
		No revision to proposed charges required.
Toby Lockwood	These co-living developments are basically PBSA by another name, and will be as detrimental (if not more so) on many areas of Exeter. They should not benefit from a much lower levy.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision to proposed charges required.</p>
Anonymous	<p>Why does this type of residential accommodation need to be encouraged in the City with a reduced CIL rate? It seems to be a fairly untested type of housing, particularly in a small city like Exeter. As a resi type it should be approved cautiously to avoid flooding the market with a type of housing which may not work or be wanted. If it is known to be a needed type of residential development for young professionals/ graduates etc. then co-living should not be allowed in areas already suffering from too many students causing an unbalanced community, (for example St James). These areas have had community balance worsened with the development of PBSA's which had a reduced CIL rate. What these student dominated areas need is any new housing development suitable for families, older residents and other residents who want a permanent home, rather than more transitory young people. These are the types of development which should be encouraged. I fear that a reduced CIL rate for co-living will just encourage plans to come forward on any available space. To those dealing with unbalanced community already, these just seem like another form of PBSA which will not improve balance or the community. As a new housing type the St James Neighbourhood Plan (2013) does not mention co-living which means there will be no protection against this type of development in an area suffering many problems.</p>	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations). Currently Co-living developments do not pay CIL and the proposed rate specifically aims at changing this position.</p> <p>Further planning policy to support development quality will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community. Co-living is likely to form an element of this mix.</p> <p>The Council is undertaking a separate review of the Article 4 area with regard to HMOs.</p> <p>No revision to proposed charges required.</p>
Catherine Delafield	Must not be allowed to degenerate into further student accommodation.	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Rachel (no surname provided)	I do not see why the Council is proposing a low rate of CIL for such developments. Planning applications for those proposed so far, show that they are little more than glorified student rooms with high, unaffordable rents for young working people. Developers should be required to contribute properly to local amenities, given that the dense nature of this type of development, puts considerable additional demands on local infrastructure.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. It is a new type of development for Exeter and therefore the viability is less well established. The proposed CIL rates are based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations). Currently Co-living developments do not pay CIL and the proposed rate specifically aims at changing this position – this will ensure these developments pay an appropriate contribution to mitigate development impact on infrastructure.</p>

Name	Response	ECC comment
		No revision to proposed charges required.
Michael Carter	Increase the rate to allow for better active travel infrastructure and more support for public transport. This is required to meet NetZero commitments. It is clear the council is not receiving enough income to ensure adequate provision for current developments. Private car use means we have increased congestion and pollution.	<p>Comment noted.</p> <p>Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure rather the viability of development.</p> <p>No revision proposed.</p>
Anonymous	Seen as the answer to a housing crisis - but is it really. Is this really the sort of development to attract young professionals, young families. Exeter needs to consider housing for such people within the city not pushing them out to greenfield developments. the rate is too low	<p>Comment noted.</p> <p>Further planning policy to support development quality will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community. Co-living is likely to form an element of this mix.</p> <p>No revision proposed.</p>
Anonymous	These could soon by default become PBSAs UNLESS there were strict management controls forbidding student occupation.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such.</p> <p>No revision to proposed charges required.</p>
Carolyn Harries	As for the rental accommodation, please could the council ensure that the charge is not passed on to the tenants?	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence and so the increased CIL rate should be affordable to the developers and therefore should not be passed to tenants.</p> <p>No revision to proposed charges required.</p>
Anonymous	This seems quite a low rate.	<p>Comment noted.</p> <p>The proposed CIL rates are based on viability evidence. Currently Co-living developments do not pay CIL and the proposed rate specifically aims at changing this position.</p> <p>No revision to proposed charges required.</p>
Si Johns YMCA EXETER	YMCA Exeter wonders if developers would not be more likely to build large blocks of "Co-Living" accommodation and then heavily market these to students to avoid the higher PBSA rates? Co-Living developments should also be subject to the requirements to provide a percentage to social housing. Not all social housing provision should be co-living however. There is a real need for self-contained social housing for people who, due to previous trauma, often need private spaces.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. Further planning policy to support development quality will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development, including affordable housing, to meet the needs of the community.</p> <p>No revision to proposed charges required.</p>
Mrs M Holding	Should be a higher rate for those building it if the rate is for the people residing in co living they should not be charged as much if the charge of 50 is for the builders of co living it should be much higher	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>



Name	Response	ECC comment
Rebecca Bower	This will turn out to be PBSAs by another route and needs to be at least at the rate of other residential building of £80.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. The proposed CIL rates are based on viability evidence.</p> <p>No revision to proposed charges required.</p>
Mark (no surname provided)	Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. The proposed CIL rates are based on viability evidence.</p> <p>No revision to proposed charges required.</p>
Simon Egan	This is likely to blight our future neighbourhood and City while failing to provide appropriate homes for young professionals, and that it would be very unwise to provide developers with this incentive	<p>Comment noted.</p> <p>Further planning policy to support development quality will be included in the emerging Exeter Plan. This will encourage a variety of different forms of residential development, including affordable housing, to meet the needs of the community.</p> <p>Currently Co-living developments do not pay CIL and the proposed rate specifically aims at changing this position.</p> <p>No revision to proposed charges required.</p>
Ann Keen	This seems to be virtually the same as PBSA, although marketed to others as well as students, so should surely attract the same rate of CIL as PBSA. Again these type of relatively dense development will inevitably put a greater strain on local services so the CIL needs to reflect that.	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such.</p> <p>Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure rather the viability of development.</p> <p>No revision to proposed charges required.</p>
Amanda Hesford	see above	<p>Comment noted.</p> <p>The CIL charging schedule is informed by evidence relating to economic viability. Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure.</p> <p>No revision proposed.</p>
Anonymous	<p>Rate should be equal to or higher than standard residential rate and reflect the potential profits of the developer in determining the rate.</p> <p>These types of development generate still generate a community infrastructure need not dissimilar to student accommodation that the council still needs to meet and fund. Hence same rate.</p>	<p>Comment noted.</p> <p>The CIL charging schedule is informed by evidence relating to economic viability. Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure.</p>

Name	Response	ECC comment
	A higher fixed amount should be spent solely on the neighbourhood hosting any particular development. This should ring-fenced	A proportion of the CIL is made available to support local community projects.  No revision to proposed charges required.
Robert Ellis	This type of development is becoming more popular, setting a lower rate than standard residential is a missed funding opportunity.	Comment noted.  The CIL charging schedule is informed by evidence relating to economic viability. Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure.  No revision to proposed charges required.
Jonathan Rowlatt	A CIL rate lower than standard residential is supported, as this will encourage a greater diversity of residential types, better meeting the needs of the community and providing an increased number of new homes for all ages. Increased co-living accommodation will help the retention of young talent in the city, assist the return of HMO's back to family dwellings and provide high quality accommodation for those moving into the area for work.	Comment noted.  No revision to proposed charges required.
Ben Partridge	I need context. How much has CIL raised in the past? What is the average levy? How does £50/m <sup>2</sup> translate into the overall cost of a development? Unfortunately with all levies the developer will just pass them onto the eventual tenants. A new way should be found to raise money that doesn't penalise the final occupier.	Comment noted.  More than £24m of CIL has been received since its implementation. The potential CIL rates are calculated on the basis of locally-specific viability evidence which determines that proposed CIL rates are affordable for development. CIL charges are not passed to final occupiers.  No revision proposed.
Emma Townsend	This needs to match the rate for student living otherwise there is the risk that these will be applied for and will be used for students.	Comment noted.  Co-living is a different form of development to purpose built student accommodation and will be permitted as such. The CIL charging schedule is informed by evidence relating to economic viability.  No revision to proposed charges required.
Anonymous	Far too low	Comment noted.  No revision to proposed charges required.
Anonymous	Should be higher	Comment noted.  No revision to proposed charges required.
Stuart (no surname provided)	Should be the same as student build - we've already seen developers using this term - Co Living, as well as Sui Generis - to skirt around paying less. Make them pay properly and maybe they will consider the sustainability and impact of what they are building a bit more?	Comment noted.  Co-living is a different form of development to purpose built student accommodation and will be permitted as such. The CIL charging schedule is informed by evidence relating to economic viability.  No revision to proposed charges required.
Ian Harrison	The comments I made for build to rent apply to this category as well.	Comment noted.  The proposed CIL rates are based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).

Name	Response	ECC comment
		No revision to proposed charges required.
Chris Pope	It is not clear why this form of flat share should be a lower rate. One assumes that students cannot be prevented from renting a co-living space - for example a part time work/study student - and so offers developers a way around the higher charge for designated student accommodation.	Comment noted.  Co-living is a different form of development to purpose built student accommodation and will be permitted as such. The CIL charging schedule is informed by evidence relating to economic viability.  No revision to proposed charges required.
Cheryl Freeman	At least x3 rate of residential but again there has been too much of this in the city centre.	Comment noted.  No revision to proposed charges required.
Simon Egan	Should be much higher: these will eventually all be full of students	Comment noted.  Co-living is a different form of development to purpose built student accommodation and will be permitted as such.  No revision to proposed charges required.
Debbie Croxford	There must be a guarantee that a good proportion of the homes built are for rental.	Comment noted.  No revision to proposed charges required.
Stephen (no surname provided)	It's not clear how this isn't just another form of PBSA. Also, this is likely much more profitable than single family homes. Hence it shouldn't be discounted below that of single family homes. I would advocate at least £100 per sq. m (less than PBSA but more than normal residential).	Comment noted.  Co-living is a different form of development to purpose built student accommodation and will be permitted as such. The CIL charging schedule is informed by evidence relating to economic viability.  No revision to proposed charges required.
Martin Redfern	<p>To justify PBSA's inclusion in the review they said it had changed significantly because more studio flats and communal areas were being provided in student blocks than previously, based on a review of eight privately-provided Exeter schemes among the 62 that have so far been built in the city.</p> <p>At the same time they found that the two Exeter co-living schemes which have been granted planning permission provided a "basis for the typologies" even though work has not begun on Harlequins redevelopment in the two years and two months since it was approved and work stopped at The Gorge a month ago after contractors pulled out.</p> <p>They claimed "specific characteristics and acknowledged difference to others types of development" for co-living without explaining what those characteristics might be or who it is that 'acknowledged', them.</p> <p>The decision (for which no evidence was supplied) to reduce this by two-thirds titled the viability assessment significantly in favour of developers.</p> <p>Unsurprising finding that co-living development is more profitable than building flats for rent or sale, given the very high densities in co-living (and PBSA) permitted by a lack of space standards, nevertheless gave the consultants cause to conclude that co-living constitutes a "different model of housing provision" that is "clearly distinct in viability terms", thus justifying the council's typology.</p>	<p>Comment noted.</p> <p>Co-living is a different form of development to purpose built student accommodation and will be permitted as such. The CIL charging schedule is informed by evidence relating to economic viability. It is reasonable to set a specific rate for co-living as this is an emerging housing product in Exeter.</p> <p>No revision to proposed charges required.</p>
	The principle of a rate for "Co-living" is welcomed.	Comment noted

Name	Response	ECC comment
Councillor Diana Moore-Co-Leader Progressive Group	<p>i) 1 "Co-living" and PBSA should both be charged at the same rate (£150 p/msq).</p> <p>ii) 2. Rather than the laissez-faire approach to "Co-living" recommended in the viability assessment statement, encouraged by a low rate, a strategic and managed approach using the Community Infrastructure Levy (CIL) and planning policy together must be adopted, and "Co-living" must be clearly defined in planning policy. 3. Policy H5 has not led to any significant change of class use away from HMMOs and has led to an overconcentration of PBSA in particular areas within and adjoining the city centre. "Co-living" will further add to this imbalancing effect in some areas. Therefore, a lower rate for "Co-living" compared to PBSA is not justified.</p> <p>iii) 4. The Article 4 Direction area (subject to any future changes should be defined as a CIL charging and planning zone within which "Co-living" and PBSA should attract an uplift in the CIL rate to limit the number of Houses in Multiple Occupation (HMOs), PBSA and "Co-living" developments in the zone to achieve the planning policy of `balanced communities`. A review of the rate for Sui Generis class use (current zero) rated should be considered to align with this policy.</p> <p>iv) 5. The low CIL rate for "Co-living" will incentivise viable and profitable, but unaffordable to rent, developments which will further exacerbate the City's lack of affordable housing.</p>	<p>i) Co-living and PBSA are different products at different stages in market maturity and with different viability. The CIL rates respond to these differences.</p> <p>ii) Rather than laissez-faire the Council has responded by setting a new rate for this emerging form of development. The work on the emerging Exeter Plan will consider in more detail a definition for co-living. The varying CIL rates are set in line with the scope permitted in the regulations. The viability testing has included the affordable housing requirements for each type of development tested.</p> <p>iii) The Exeter Plan will consider the issue of balanced communities. The PBSA and co-living are not HMOs and therefore the ongoing work on the Article 4 Direction revision will not have a direct impact in managing these forms of development.</p> <p>iv) The rate for co-living is an increase from the £0 currently charged and has been set on the basis of viability evidence. Co-living will help to diversify the market in order to provide a further housing option which aims to make accommodation more affordable. Co-living schemes can provide affordable housing. The Exeter Plan will consider the issue of affordable housing in more detail as informed by the Local Housing Needs Assessment.</p> <p>No revision to the proposed charges required</p>

## 8. Responses to other elements of the Draft Charging Schedule and supporting documentation

8.1. The Council is not proposing to introduce or amend the rates for any other uses beyond flatted development, co-living, build to rent and PBSA. However respondents were able to provide general comments on the draft charging as a whole and the supporting evidence. Responses are included in this section.

Do you have any other comments to make on the proposed charging schedule or the supporting documents?

Note that where a response has been provided to this question but relates to the different uses and rates, it will be split across the appropriate sections of the document. Any supporting letter is noted in Appendix B

Name	Response	ECC comment
<p>Alex Cave (JLL) Blocwork LLP</p>	<p>Representation to the Exeter Community Infrastructure Levy Draft Charging Schedule These representations have been prepared by JLL behalf of Blocwork LLP in respect of the above referenced consultation. These representations are submitted in respect of land at St David's which is allocated for development under Saved policy KP5 from Local Plan First Review 1995-2011 and is also identified in the Exeter Plan Outline Consultation document as a draft site allocation Red Cow/St David's (Site Ref. 22). Blocwork LLP are looking to take forward proposals on the subject site to deliver an optimum density residential led mixed use development which includes station enhancements including a new multi-storey car park to meet current and future passenger needs. The residential component of the proposals is Build to Rent accommodation. Blocwork LLP are currently in pre-application discussions with Exeter City Council in respect of the redevelopment of the subject site. A summary of the representations submitted in respect of the current CIL consultation is outlined below: - The introduction of new residential products, such as Build to Rent into the CIL charging schedule is welcomed. - The emerging proposals at St David's should be given CIL relief given that it will deliver a city-wide piece of infrastructure which can be viewed as being similar in nature to the purpose of CIL. Planning Policy Context It is understood that the primary context for the CIL partial review will be that of the current adopted local plan, as outlined in the supporting background information paper. Notwithstanding this, it will be important to also have regard to the emerging Exeter Plan, in the context of the St David's site given that the site allocation and associated infrastructure requirements is proposed to be retained in the emerging Exeter Plan. Outlined below is an overview of the site allocation status/requirements for the subject site having regard to adopted and emerging policy. Adopted Policy Allocation Land at St Davids Station is allocated for development under policy KP5 Saved Policy from Local Plan First Review 1995-2011. Policy KP5 supports the mixed-use redevelopment of land at St David's Station for offices, student housing and retail along with public transport interchange facilities with buses and to provide improved cycle parking. The supporting text notes that in the long term there may be potential to achieve multi storey car parking and to release some of the existing car parking land for offices and further housing. Emerging Policy Allocation The existing site allocation in the Exeter Local Plan First Review is to be retained and expanded within the emerging Exeter Plan. The site allocation is being extended to cover the whole Red Cow Site. Red Cow/St David's (Site ref. 22) is to be retained as a mixed-use development allocation to provide a place to live and work. The draft plan outlines that development may include: - Delivery of 430 net new homes</p>	<p>Comment noted.</p> <p>The proposed changes to the draft charging schedule already reduce the CIL rate for built to rent by separating it from the wider residential rate.</p> <p>Comments in relation to individual site circumstances can be dealt with through the application process, noting that PPG is clear that land value should reflect specific site constraints and costs. This site specific issue would not affect the wider principle of charging CIL for build to rent across the city.</p> <p>No revision to proposed charges required.</p>

Name	Response	ECC comment
	<ul style="list-style-type: none"> <li>- High quality, high density and net zero carbon design that takes a strategic approach to flood risk mitigation, respects heritage assets and the amenity of neighbouring homes and ensures a healthy living environment for residents</li> <li>- A mix of house sizes and types, including affordable housing, with low level car parking provision (for homes) supported by more sustainable transport measures including car clubs, e-bikes and improved pedestrian and cycle links to the surrounding area</li> <li>- Highways improvements and the retention of car parking for the station</li> <li>- A new local centre to the front of the station incorporating public open space, work spaces, shops, leisure uses and a new transport interchange that includes bus stops, taxi and cycle facilities</li> <li>- Financial contributions towards local health and education services and utilities</li> <li>- A net gain in biodiversity and funding for measures to reduce the recreational impact of development on the Exe Estuary and, where relevant, other nearby internationally important sites</li> </ul> <p>Representations to CIL Consultation</p> <p>Exeter City is consulting on a partial review of their adopted Community Infrastructure Levy (CIL). It is understood that the Council has decided to move forward with a partial review of CIL in response to changes and new products which have been introduced into the local property market. The revised CIL charging schedule will enable uses such as flatted development (for sale), flatted development Build to Rent, and Co-living and Purpose-built student accommodation to be specifically considered and subject to CIL at the rates proposed. This will add new categories to the range of uses which will be liable for CIL and enable the specific requirements of uses, such as Build to Rent, to be considered, rather than being included within the wider Residential classification. This principle of this change is welcomed by our client.</p> <p>As noted above, Blocwork are bringing forward proposals for the mixed-use redevelopment of the subject site which is to include inter-alia new rail user facilities including a new multi storey car park. Key to the development proposals will also be the creation of high-quality urban space and public realm to create an attractive gateway to the city.</p> <p>The new rail user facilities, public realm and station enhancements will need to be made viable through the delivery of enabling type development such as new residential accommodation on land released from the development project. This is because the train operator company are the beneficiary of income generated by the existing car park, rather than Network Rail. To gain the support of the train operating companies to allow the release of land to support the proposals, the provision of an appropriate amount of car parking will be required to support current and future needs of the railway station.</p> <p>The new multi storey car park is an important form of infrastructure which will support the city in terms of the ongoing operation of the station. Enhancing the rail user facilities at this strategic transport interchange can support a step change in the level of public transport use in the city to support the councils aspiration to achieve Net Zero (as documented in the Exeter 2030 Plan prepared by Exeter City Futures).</p> <p>The subject site is unique in that it will deliver a city-wide piece of infrastructure as part of the development, which can be viewed as being similar in nature to the purpose of CIL.</p> <p>Our client is of the view that the subject site at St David's should be offered relief from CIL given that it will be making a significant contribution towards infrastructure for the station which will be of city-wide importance and benefit.</p> <p>The redevelopment of brownfield land often comes with development and viability challenges which are typically associated with abnormal costs. In the context of the subject site, there will also be site-specific infrastructure costs associated with the redevelopment of the site, namely the construction of a new multi storey car park. To avoid rendering the subject site unviable in light of cost burdens associated with the associated infrastructure, relief should be granted across the subject site to support the delivery of the proposed development which will bring with it numerous socio-economic and environmental benefits.</p>	

Name	Response	ECC comment
	Our client requests to be notified of relevant updates in respect of the emerging CIL consultation. We also request the right to be heard at the subsequent Examination in public.	

**RESPONSES ON CIL RATES WHICH THE COUNCIL IS NOT PROPOSING TO CHANGE**



## 9. Responses regarding the residential rate:

9.1. It should be noted that the Council is not proposing to amend the residential rate and therefore has not undertaken full viability appraisal here. For completeness, respondents were able to provide comments on the current residential rate during the consultation and so the responses are included however it is not proposed to consider the current residential rate in detail here. Consultation responses will be used to inform future decisions regarding any potential further revisions to the CIL or Infrastructure Levy (as proposed by Government) regime following the adoption of the emerging Exeter Plan (the emerging Local Plan).

### Do you agree or disagree with the proposed residential rate?

	Number of Respondents	%
Agree	31	58
Disagree	22	42

### Do you have any comments on the proposed residential rate?

Name	Response	ECC comment
Ian Hodgson	Should be lower. We need more affordable housing for couples and families.	Comment noted.  The Council is not proposing to change the residential CIL rate.  No revision proposed.
John Yates	What does disagree amount to on your smart computer model? We need a city designed for coming generations to thrive in - not a Hong Kong in Devon.	Comment noted.  The Council is not proposing to change the residential CIL rate.  No revision proposed.
Stephanie Eaton McLaren	CIL is intended to reflect and mitigate the impact that all schemes have in terms of infrastructure. This represents an unfair bias for residential to buy schemes to have less CIL liability than PBSA. We consider Residential to have more of an impact on infrastructure. All residential schemes create an impact on their environment and should be assessed accordingly.	Comment noted.  The Council is not proposing to change the residential CIL rate.  CIL rates are based on the viability of development rather than infrastructure requirements.  No revision proposed.
Annette Plaut	Many new-build residential properties, in locations in close proximity to the University, end up not accommodating families etc. but instead are bought by investment buyers and rented out to students as HMOs, for instance Horseguards (even though students houses are banned within Horseguards) and King William Street.  This investment purchasing of new-build residential properties is not covered by the Article 4 Direction. Could this residential rate be geographical-location dependent within Exeter?	Comment noted.  The Council is not proposing to change the residential CIL rate.  The Council is undertaking a separate review of the Article 4 area with regard to HMOs.

Name	Response	ECC comment
		<p>Differential CIL rates can be applied on an area basis however there is no viability evidence to justify this and implementing a number of different rates would be very complicated.</p> <p>No revision proposed.</p>
<p>Gert Vonhoff Exeter Civic Society</p>	<p>ECS would set this rate slightly higher.</p> <p>The new sites as laid out in the Exeter Plan are mostly in or in close reach to the city centre. This increases infrastructure adaptations within the centre (traffic, schools, leisure etc.). The gap in funding through CIL needs to be narrowed.</p> <p>Traditional homes at low densities are not making the best use of the greenfield land they sit on, and if on the edge of the city, do require highway infrastructure which is expensive. A higher than suggested rate can help to disincentivise these kinds of developments. It might be useful to distinguish between Residential on greenfield / edge of the city sites and on brownfield / inner city sites by setting two rates here.</p> <p>High density housing of 50 homes per Ha or more may be charged at a lower rate. This could result in more CIL being collected because there will be more built floor area per Hectare.</p> <p>Other councils seem to have raised or set their rates higher than Exeter currently has: Cheltenham at £200; East Devon (rev Oct 2020) at £200 for the highest zone, e.g. in Sidmouth, £100 in strategic sites (which shows CIL as a planning tool); Teignbridge in 2022 £150 for development in SW Exeter area, less elsewhere; Cornwall (2018) at £400 for small scale developments and £200 for large scale developments in their highest charged zones.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>The residential CIL rates are indexed up from the rates set in 2013 as required by the CIL regulations. These rates are not proposed to change. In future the Exeter Plan will be informed by an additional viability evidence base which would take account of the amended CIL rates proposed here. Furthermore, in future, following the adoption of the Exeter Plan, there may be a need to review CIL charges again or take into consideration the Government proposals for an Infrastructure Levy.</p> <p>CIL rates in other areas will reflect the viability and policy requirements specific to those locations.</p> <p>No revision proposed.</p>
<p>Kath Sidgwick Alphington Community Association</p>	<p>It seems appropriate that the fee is in line with inflation as a minimum.</p>	<p>Commented noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>
<p>Catherine Delafield</p>	<p>Ensure correct net zero development.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>
<p>Anonymous</p>	<p>It should be higher.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>
<p>M Cottingham</p>	<p>Suggest ok for brownfield but should be more for greenfield.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p>

Name	Response	ECC comment
		<p>The majority of flatted developments will come forward on brownfield sites and therefore the proposed zero rates for this type of development effectively reduces the rate for much brownfield development.</p> <p>No revision proposed.</p>
Michael Carter	<p>Increase the rate to allow for better active travel infrastructure and more support for public transport. This is required to meet NetZero commitments. It is clear the council is not receiving enough income to ensure adequate provision for current developments.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure rather the viability of development.</p> <p>No revision proposed.</p>
Beverley Little	<p>We pay enough Council Tax already. As an OAP its becoming more &amp; more of a struggle to pay bills</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>CIL is a charge on new development rather than a form of regular Council tax. The proposed revisions to the CIL rates will not affect Council taxes.</p> <p>No revision proposed.</p>
Mrs M Holding	<p>Co living should be taxed as it's only a money making project not a benefit to those squeezed I am to inappropriate settings and will always be for longer than stated as in other areas of the country where people have been in their for 8-10yrs at times so should not be encouraged in our area</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>Currently Co-living does not pay CIL. The proposed revision to the CIL rates introduces a specific rate of £50/sqm for Co-living to ensure it provides appropriate contributions to infrastructure requirements.</p> <p>No revision proposed.</p>
Mark (no surname provided)	<p>Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>The charging of CIL does not replace Council tax – they are different regimes. CIL charges are calculated on the basis of development viability evidence. On this basis it is proposed to increase the CIL charges for Purpose Built Student Accommodation.</p> <p>No revision proposed.</p>
Simon Egan	<p>This is likely to blight our future neighbourhood and City while failing to provide appropriate homes for young professionals, and that it would be very unwise to provide developers with this incentive</p>	<p>Comment noted.</p>

Name	Response	ECC comment
		<p>The Council is not proposing to change the residential CIL rate.</p> <p>CIL is not setting planning policy, it is charge paid on specific types of development in order to help fund infrastructure. It is not used as a development incentive.</p> <p>No revision proposed.</p>
Anonymous	<p>Rate should be much higher and variable and reflect the potential profits of the developer in determining the rate for a particular development. There should be no exemption for student accommodation or 'social housing' as it still generates a community infrastructure need (more so). Fixed amount should be spent solely on the neighbourhood hosting any particular development. This should ring-fenced. 5% admin costs is far too high and council must do better in terms of efficiency. Admin costs should be levied on developer separately from rate.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure rather the viability of development. CIL rates should therefore not be increased to fund infrastructure costs.</p> <p>The CIL Regulations stipulate that up to 5% of CIL may be spent on the costs of collecting and spending CIL.</p> <p>No revision proposed.</p>
Robert Ellis	<p>This rate appears low (e.g. approx. £6k for a standard two bedroom house), however I understand that it is supported by an evidence base and market appraisal.</p>	<p>Comment noted.</p> <p>No revision to proposed charges required.</p>
Will Page	<p>Appears to be too low. This is difficult to understand with the way this information has been presented</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>The CIL charging schedule is informed by evidence relating to economic viability.</p> <p>No revision proposed.</p>
Jonathan Rowlatt	<p>The proposal to leave the base residential rate unchanged is supported</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>
Ben Partridge	<p>I need context. How much has CIL raised in the past? What is the average levy? How does £80/m<sup>2</sup> translate into the overall cost of a development? Unfortunately with all levies the developer will just pass them onto the eventual occupier, be it tenants or owners. A new way should be found to raise money that doesn't penalise the final occupier.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>More than £24m of CIL has been received since its implementation. The potential CIL rates are calculated on the basis of locally-specific viability evidence which determines that proposed CIL rates are affordable for development. CIL charges are not passed to final occupiers.</p>

Name	Response	ECC comment
Anonymous	Far too low. There has been a complete failure to collect sufficient funding to pay for increased services required by new residents of the epic scales urban sprawl produced by the last local plan, where for example is the promised hill Barton station? Instead developers have been allowed offensive profits for poor quality developments which do not even meet the legal active travel requirements.	<p>No revision proposed.</p> <p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>The CIL charging schedule is informed by evidence relating to economic viability. Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure rather the viability of development.</p> <p>No revision proposed.</p>
Anonymous	Should be higher	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>
Mr Brown	Why are we paying city council officials when they are always asking the public for their views? Surely they are paid enough to make a decision on their own?	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>This is not relevant to the calculation of the chargeable amount of CIL.</p> <p>No revision proposed.</p>
Anonymous	Should be higher with the costs of everything spiralling.	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>
Anonymous	Could be higher? £100.00 why not?	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>The CIL charging schedule is informed by evidence relating to economic viability.</p> <p>No revision proposed.</p>
Roger Oakford	It should be more than the current rate, in order that more funding is available for investment into overburdened infrastructure.	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>Although CIL is used to fund improvements to infrastructure, the rates are not determined on the basis of the costs of the infrastructure rather the viability of development.</p>

Name	Response	ECC comment
Ian Harrison	I agree subject to the adjusted rate / m2 is comparable to other cities of similar size. As a layman I have no meter to judge whether this rate is right or wrong!	<p>No revision proposed.</p> <p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>
Anonymous	The county council request education contributions for residential development via S106 in addition to the CIL rate. It would be helpful if this requirement was either included in the CIL rate for transparency or any education element within the CIL excluded so that it can be requested via S106. This would avoid the double counting that has happened over the last few years on sites recommended for approval and not contested by the county council on sites approved planning via the appeal process.	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>The Government has made amendments to the CIL Regulations, 1 September 2019. These identify the replacement of Regulation 123 lists with an 'annual infrastructure funding statement' –the first such statement was published by the Council in December 2020. The amended Regulations allow authorities to use funds from both CIL and planning obligations to pay for the same piece of infrastructure, regardless of how many planning obligations have already contributed towards it. The Council's current infrastructure funding statement which sets out what the Council could spend CIL on does not include general education provision and currently this type of infrastructure is funded from S106.</p> <p>No revision proposed.</p>
Stephen (no surname provided)	I do not agree with owner-occupied residential CIL that is higher than rental CIL rates. We need more owner-occupied properties and they are the least profitable to build, so the ECC should be supporting their development not hindering it.	<p>Comment noted.</p> <p>The Council is not proposing to change the residential CIL rate.</p> <p>No revision proposed.</p>

## 10. Responses regarding the out of city centre retail rate – this is not proposed to change

10.1. It should be noted that the Council is not proposing to amend the out of city centre rate and therefore has not undertaken full viability appraisal here. For completeness, respondents were able to provide comments on the current out of city centre rate during the consultation and so the responses are included, however it is not proposed to consider the current out of city centre rate in detail. Consultation responses will be used to inform future decisions regarding any further revisions to the CIL or Infrastructure Levy (as proposed by Government) regime following the adoption of the emerging Exeter Plan (the emerging Local Plan).

### Do you agree or disagree with the proposed city centre retail rate?

	Number of Respondents	%
Agree	27	63
Disagree	16	37

### Do you have any comments on the proposed city centre retail rate?

Name	Response	ECC comment
John Yates	Consumerism is a debilitating & mind numbing modern phenomenon - yes to creating village retail centres - fresh foods - chemists etc. with support for local producers but more shopping or GDP is not going to create the viable "wellbeing" world we owe or children.	Comment noted.  The Council is not proposing to change the 'outside of city centre' retail rate.  No revision proposed.
Phyllida Brown	No - but small retail units in the city centre should be incentivised to give independent shops a chance of survival	Comment noted.  The Council is not proposing to change the 'outside of city centre' retail rate. However, the CIL rate is zero for retail in the city centre and so small units do not pay CIL.  No revision proposed.
Anonymous	This appears about right.	Comment noted.  No revision proposed.
Stephanie Eaton McLaren	This looks inordinately high given the state of UK retail. There is nothing encouraging with such a high CIL rate.	Comment noted.  The retail CIL rates are indexed up from the rates set in 2013 as required by the CIL regulations. The Council is not proposing to change the 'outside of city centre' retail rate. In future the Exeter Plan will be informed by an additional viability evidence base which would take account of the amended CIL rates proposed here. Furthermore, in future, following the adoption of the Exeter Plan, there may be a need to review CIL charges again or take into consideration the Government proposals for an Infrastructure Levy.

Name	Response	ECC comment
		<p>The retail CIL rate is a longstanding requirement and we would expect retail developers to take account of the charge when negotiating land purchase.</p> <p>No revision proposed.</p>
Gert Vonhoff Exeter Civic Society	<p>This rate for 2022 was £185.27 per sqm.</p> <p>ECS finds it important to produce incentives for empty city centre retail venues. To charge retail outside the city centre makes it more costly to establish retail in new out of town developments. This, however, is not in line with the 20 mins planning for the low traffic aim of the Exeter Plan. ECS therefore wonders whether food premises and pharmacies in new developments outside the city centre (as, for example, in the Water Lane Area) should be given a rebate: lower the rate down to 50% of the out of city centre rate. There might already be a level, below there is no charge.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>The retail CIL rates are indexed up from the rates set in 2013 as required by the CIL regulations. In future the Exeter Plan will be informed by an additional viability evidence base which would take account of the amended CIL rates proposed here. Furthermore, in future, following the adoption of the Exeter Plan, there may be a need to review CIL charges again or take into consideration the Government proposals for an Infrastructure Levy.</p> <p>Note that CIL is not charged on retail development under 100 sqm m.</p> <p>No revision proposed.</p>
Anonymous	Should be higher	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>No revision proposed.</p>
M Cottingham	Ok for brownfield. Should be more for greenfield?	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. The rate was set at an appropriate level to take account of development viability taking into account site characteristics.</p> <p>No revision proposed.</p>
Michael Carter	Increase the rate to allow for better active travel infrastructure and more support for public transport. This is required to meet NetZero commitments. It is clear the council is not receiving enough income to ensure adequate provision for current developments. Private car use means we have increased congestion and pollution.	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. The rate was set based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>No revision proposed.</p>
Mark (no surname provided)	Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.	<p>Comment noted.</p> <p>This comment does not relate to the existing 'outside of city centre' retail rate.</p>



Name	Response	ECC comment
		<p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>No revision proposed</p>
Anonymous	<p>Rate should be much much higher and reflect the substantial potential profits of the developer. Retail tenants should match the rate of the developer (if different) to show good faith and respect to host neighbourhood.</p> <p>These types of development generate a significant community infrastructure need that the council needs to meet and fund. Additional environmental and highways costs.</p> <p>These developments should be restricted to brown field or the rate should double for green field in order to discourage.</p> <p>A higher fixed amount should be spent solely on the immediate local environment and neighbourhood hosting any particular development. This should be ring-fenced</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. The rate was set based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>No revision proposed.</p>
Robert Ellis	<p>Making retail within the city centre CIL exempt is a sensible move to reduce costs on businesses and developers.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>No revision proposed.</p>
Mike Walton Exeter Cycling Campaign	<p>Residential / flatted residential / build to rent CIL levy should be at this level</p>	<p>Comment noted.</p> <p>This comment does not relate to the existing 'outside of city centre' retail rate.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>No revision proposed.</p>
Ben Partridge	<p>This should be higher if the final occupiers are large retailers because they are able to spread the cost further.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. The rate was set based on viability evidence.</p> <p>No revision proposed.</p>
Anonymous	<p>Far too low. Not needed given existing empty capacity in centre. What happened to the policy of no retail development outside the centre from the New local plan?</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. The rate was set based on viability evidence. The emerging policy in the Exeter Plan aims to promote the success and vitality of the city centre.</p> <p>No revision proposed.</p>
Anonymous	<p>We need to support our shops and business .....so many have closed down, so Exeter High Street and Fore Street, Heavitree looks shabby.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>No revision proposed.</p>
Anonymous	<p>Should be much higher so that it protects city centre shops. No more car centric out of town shopping.</p>	<p>Comment noted.</p>

Name	Response	ECC comment
		<p>The Council is not proposing to change the 'outside of city centre' retail rate. The rate was set based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision proposed.</p>
Ian Harrison	<p>To ensure / or enhance / encourage the life /vigour of the city centre this charge should be twice (at least) what is proposed. Also, if no charge can be attached to the car parking offered then increase it significantly further.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. The rate was set based on viability evidence as opposed to being set to drive a specific policy outcome (as is required by the Regulations).</p> <p>No revision proposed.</p>
Dr David Treharne	<p>How flexible is the definition of 'The City Center'? More options probably needed as the City continues to grow eastward and out of the current City boundaries.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. The city centre is defined in current planning policy.</p> <p>No revision proposed.</p>
Chris Pope	<p>Is it possible to distinguish between the "drive to" individual retail stores and multiple mixed retail stores at one location? The latter should be cheaper than the former.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate. Setting many different rates would mean implementation and monitoring would be disproportionately challenging.</p> <p>No revision proposed.</p>
Simon Egan	<p>Should be lower.</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>No revision proposed.</p>
Debbie Croxford	<p>We should be concentrating on filling the empty units first</p>	<p>Comment noted.</p> <p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>No revision proposed.</p>
Dr Thomas S Roche (Rocke Associates Limited) Growen Estates	<p>With reference to the above consultation, on behalf of our clients, Growen Estates, we object in the strongest possible terms to the provisions of the charging schedule relating to retail development, and in particular the continued blanket application of the charge to such development outside the city centre.</p> <p>The economic and viability landscape relating to retail development has undergone a sea change since the preparation and adoption of the original charging schedule. The exponential rise in online retailing, combined with national and international events, including Brexit, the Covid 19 pandemic, the war in Ukraine, and the consequential inflationary pressures on construction costs as well as disposable incomes of consumers, are all exerting a substantial negative force on bricks and mortar retailing.</p>	<p>The Council is not proposing to change the 'outside of city centre' retail rate.</p> <p>The retail CIL rates are indexed up from the rates set in 2013 as required by the CIL regulations. The retail CIL rate is a longstanding requirement and we would expect retail developers to take account of the charge when negotiating land purchase.</p> <p>ECC recognises the importance of local centres and will reflect on these comments through the work on the</p>

Name	Response	ECC comment
	<p>My clients are the promoters of a retail-led, mixed-use development at Moor Exchange to serve the existing and future business and residential communities on the east side of Exeter. The critical role of local facilities to deliver sustainable new communities is acknowledged in the Development Plan and the planning permissions that have been granted for the Monkerton and Hill Barton urban extension. Neither of the district/local centres identified in the Monkerton and Hill Barton Masterplan Study have come forward, and there is no prospect of either of them doing so. In granting planning permission for Moor Exchange<sup>1</sup>, it was acknowledged that it is now the only prospect for local facilities to serve the existing and future communities on the east side of Exeter, and critical to the creation of a sustainable community in this location.</p> <p>Given the retail economic circumstances that now prevail, and that are unlikely to change given that online retailing is now embedded in contemporary lifestyles, the burden of CIL on all out of centre developments, and not least those that the Council seeks to support to ensure the delivery of sustainable communities, is fatal and counterproductive. It is inconsistent with the Councils declared climate emergency, central to which is reducing the need to travel by providing local facilities that are accessible by sustainable transport modes, and incompatible with the concept of walkable neighbourhoods.</p> <p>Given the brake that CIL is imposing on essential retail development in out of centre locations, the current schedule is therefore frustrating the achievement of key objectives that underpin the policies and provisions of the Exeter Core Strategy, and in particular:</p> <p>3. Aim to provide everyone in the community with the opportunity of living in a decent warm home of a suitable type, size and tenure for their needs, supported by the local community facilities they require, by making full and efficient use of previously developed land and delivering sustainable urban extensions to the east and south-west in cooperation with adjoining authorities.</p> <p>6. Meet local needs for community, cultural, social, retail, health, education, religious, and recreational facilities, particularly within the urban extensions, regeneration area and in areas of deprivation, in order to improve quality of life and reduce social exclusion and the perception of crime.<sup>2</sup></p> <p>It is also part of the core strategy vision for Exeter to enhance its position as a premier retail and cultural destination.</p> <p>The CIL provisions relating to retail development are now operating against achieving the Core Strategy vision and objectives in that they are leveraging a severe brake on out of centre development which is critical to delivering sustainable urban extensions and the vision for Exeter as a premier retail destination. Under the retail market circumstances that now prevail, a much smarter approach is critical, to respond to consumer demands and lifestyles and which enable the integration of physical retailing as part of daily business and leisure activities. Bricks and mortar retailing is now competing in accessibility terms with computer and mobile phone screens, and must respond accordingly, failing which the virtual shop, which contributes little, if anything, to the local economy or employment, will prevail and retail real estate will continue its downward spiral.</p> <p>CIL is an extremely blunt instrument that fails either to reflect or respond to contemporary retail market requirements. In an E-Mail sent to the Councils Deputy Chief Executive in June 2020, a copy of which is enclosed with these submissions, my clients set out the negative forces that the CIL provisions relating to retail development were imposing on investment in the city, and in particular the delivery of Moor Exchange which is the critical cement in the delivery of a sustainable urban extension at Monkerton and Hill Barton. Those concerns were raised in the early stages of the pandemic, and the extraordinary global events that have unfolded since that time have simply compounded the negative impacts. This is real world evidence from an experienced and market-facing developer of retail real estate, rather than a hypothetical viability assessment, and which at the very least, confirms the sea-change in viability circumstances pertaining to retailing since the CIL Charging Schedule was originally adopted.</p> <p>It is therefore extremely disappointing that the commercial realities communicated at that time by an experienced promoter and developer of retail real estate seeking to deliver the Councils vision and objectives</p>	<p>emerging Exeter Plan. In future the Exeter Plan will be informed by an additional viability evidence base which would take account of the amended CIL rates proposed here. Furthermore, in future, following the adoption of the Exeter Plan, there may be a need to review CIL charges again or take into consideration the Government proposals for an Infrastructure Levy.</p> <p>No revision proposed</p>

Name	Response	ECC comment
	<p>for a sustainable community in east Exeter, appear to have been ignored. There is currently considerable interest in the development of the Moor Exchange site for a variety of alternative uses, and unless this opportunity is taken to review, and amend, the CIL provisions relating to retail development, it is likely that the opportunity to deliver local facilities for Monkerton and Hill Barton, and the wider residential and business communities of east Exeter, will be lost forever. My clients herewith request disclosure of the market evidence that supports and justifies the Councils decision not to review the CIL provisions relating to town centre uses. It is significant that your neighbouring authority, East Devon District Council, has found it necessary to structure their CIL schedule to support the delivery of town centre uses in appropriate locations in order to achieve sustainable urban communities, and notably to exclude Cranbrook, where new town centres are being promoted, from the retail levy. Given the similar market circumstances that pertain in Exeter, we find it extraordinary, and inexplicable, that you do not consider similar adjustments to your CIL Charging Schedule to be necessary.</p> <p>It is also significant that, over the past decade, and notwithstanding the planned provisions for town centre uses that have been incorporated in the urban extensions, the only out-of-centre retail developments that have come forward, have been stand-alone stores for discount convenience operators in locations of their choosing rather than those driven by the aims of sustainability, and in particular to encourage and facilitate a reduction in car travel. Given the Councils declared climate emergency, that is a failing that requires urgent rectification, and the starting point for which must be a proper understanding and response to retail market circumstances and the knockout blow that the current CIL provisions are levelling on the delivery of the critical social and community infrastructure that provides the cement for sustainable communities.</p> <p>We would urge that you give these submissions your most careful attention and would be pleased to meet with to discuss them further, if it would be of assistance. At this stage, we would request the opportunity to participate in any future examination of the revised CIL Charging Schedule.</p> <p>1 Ref. 19/1461/OUT  2 Exeter Core Strategy, p.14, emphasis added  3 Ibid, para. 3.2</p> <p><i>N.B.</i>  1,2,3 above are available under Appendix B</p>	

## 11. Responses regarding rates for any other uses

11.1. It should be noted that the Council is not proposing to introduce or amend the rates for any other uses and therefore has not undertaken full viability appraisal here. For completeness, respondents were able to provide general comments regarding rates for wider land uses during the consultation and so the responses are included, however it is not proposed to consider any additional rates in detail. Consultation responses will be used to inform future decisions regarding any further revisions to the CIL or Infrastructure Levy (as proposed by Government) regime following the adoption of the emerging Exeter Plan (the emerging Local Plan).

### Do you agree or disagree with the proposed rates for any other uses?

	Number of Respondents	%
Agree	16	37
Disagree	27	63

### Do you have any comments on the proposed rates for any other uses?

Note that where a response has been provided to this question but relates to the different uses and rates, it will be split across the appropriate sections of the document. Any supporting letter is noted in Appendix B

Name	Response	ECC comment
Ian Hodgson	Depends on the individual case.	Comment noted.  The Council is not proposing to introduce CIL rates for any additional development types.  No revision to proposed rates required.
John Yates	All Other? A nuclear power plant?	Comment noted.  The Council is not proposing to introduce CIL rates for any additional development types.  Other uses would include those for which the City Council is the Local Planning Authority.  No revision to proposed rates required.
Phyllida Brown	no	Comment noted.  The Council is not proposing to introduce CIL rates for any additional development types.  No revision to proposed rates required.
Anonymous	There is too little information to be able to make an informed comment. As it is, my opinion is that any development that places any demands on local infrastructure should be liable to CIL.	Comment noted.  The Council is not proposing to introduce CIL rates for any additional development types.

Name	Response	ECC comment
Stephanie Eaton McLaren	There is not enough detail here, what exactly falls into 'other development'?	<p>No revision to proposed rates required.</p> <p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
M Cottingham	The city needs the cash to cater for the infrastructure needed to cope with the growth, should maximise what they bring in.	<p>Comment noted.</p> <p>CIL rates need to be based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Anonymous	This is disconcertingly vague. How can I agree with a flat zero rate for such a wide classification?	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Michael Carter	Increase the rate to allow for better active travel infrastructure and more support for public transport. This is required to meet NetZero commitments. It is clear the council is not receiving enough income to ensure adequate provision for current developments. Private car use means we have increased congestion and pollution.	<p>Comment noted.</p> <p>CIL rates need to be based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Carolyn Harries	'All other development' is too general a term. I think charges should be considered on an individual planning basis.	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Mrs M Holding	Not sure what this includes not really clear	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p>

Name	Response	ECC comment
		<p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Rebecca Bower	How can this be zero when we don't know what it could be?	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Mark (no surname provided)	Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.	<p>Comment noted.</p> <p>CIL rates need to be based on viability evidence as opposed to being linked to Council tax revenues.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Amanda Hesford	Surely this depends on the type of development, for instance is the proposal of social benefit	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Anonymous	<p>Rate should be much much higher and reflect the substantial potential profits of the developer.</p> <p>These types of development generate a significant community infrastructure need that the council needs to meet and fund.</p> <p>These developments should be restricted to brown field sites or the rate should double for green field.</p> <p>A higher fixed amount should be spent solely on the immediate local environment and neighbourhood hosting any particular development. This should be ring-fenced</p>	<p>Comment noted.</p> <p>CIL rates need to be based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>CIL rates are not set to drive a specific policy outcome such as brownfield development however emerging planning policy in the new Exeter Plan is prioritising brownfield development over greenfield.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Will Page	Again - the way this information is presented makes this difficult To understand. I am opposed to this as I do not know what types of development this could include.	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p>

Name	Response	ECC comment
		<p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Ben Partridge	Seems odd why this is £0	<p>Comment noted.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Emma Townsend	<p>This partial review has been prompted by development proposals which did not fit under the existing scheme which were not known about at the time. So by keeping a zero charge category the CIL charging scheme is still a weakness which can be exploited by future developments. There needs to be a minimum charge.</p>	<p>Comment noted.</p> <p>The CIL review has focused on revising those uses which are considered to have evolved significantly since the implementation of the existing CIL regime – this has focused on purpose built student accommodation, co-living, build to rent and flats.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Anonymous	Far too low why zero?	<p>Comment noted.</p> <p>The CIL review has focused on revising those uses which are considered to have evolved significantly since the implementation of the existing CIL regime – this has focused on purpose built student accommodation, co-living, build to rent and flats.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Anonymous	Should subsidise green areas / parks etc.	<p>Comment noted.</p> <p>CIL revenue can be used to fund a variety of infrastructure, including green infrastructure which such as green space.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Anonymous	Not sure what this means but 0 sounds unfair.	<p>Comment noted.</p> <p>The CIL review has focused on revising those uses which are considered to have evolved significantly since the implementation of the existing CIL regime – this has focused on purpose built student accommodation, co-living, build to rent and flats.</p>



Name	Response	ECC comment
		<p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Anonymous	What about standard housing?	<p>Comment noted.</p> <p>Residential development already pays CIL.</p> <p>No revision to proposed rates required.</p>
Ian Harrison	I would want to see a list of what all other development actually means before agreeing.	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Dr David Treharne	Surely, some flexibility is needed here to allow for as yet unenvisioned development?	<p>Comment noted.</p> <p>The CIL review has focused on revising those uses which are considered to have evolved significantly since the implementation of the existing CIL regime – this has focused on purpose built student accommodation, co-living, build to rent and flats.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Chris Pope	It's not clear what "other development" is or why it should be exempt from contributing towards community infrastructure as it is bound to have some impact upon infrastructure needs.	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority. CIL rates need to be based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Cheryl Freeman	Too vague	<p>Comment noted.</p> <p>Other uses would include those for which the City Council is the Local Planning Authority.</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Stephen (no surname provided)	It's unclear what other developments exist but given the need for city funds, I don't see why theses should be free.	<p>Comment noted.</p>

Name	Response	ECC comment
		<p>Other uses would include those for which the City Council is the Local Planning Authority. CIL rates need to be based on viability evidence as opposed to the need for infrastructure (as is required by the Regulations).</p> <p>The Council is not proposing to introduce CIL rates for any additional development types.</p> <p>No revision to proposed rates required.</p>
Martin Redfern	<p>I would like to submit comment on Exeter City Council's draft community infrastructure levy charging schedule as part of the consultation that is taking place.</p> <p>My comment takes the form of a draft of an article I have written for publication in Exeter Observer. Please find it attached in PDF format.</p> <p>I would also like to ask to be heard by the examiner at the prospective examination of this draft community infrastructure levy charging schedule.</p> <p>Key general comments drawn from the response</p> <p>A local plan evidence base review has also taken place, with extensive new up-to-date evidence published alongside the draft version of the new plan last year.</p> <p>Despite this, the council's new levy proposals do not take into account any of the new local plan's evidence base.</p> <p>None of this deterred the council from pursuing its policy-driven levy charging proposals, even though government guidance makes clear that setting differential levy rates raises the viability evidence bar even higher.</p>	<p>Comment noted.</p> <p>CIL rates are not set to drive a specific policy outcome such as brownfield development however emerging planning policy in the new Exeter Plan is prioritising brownfield development over greenfield.</p> <p>In general terms, CIL rates are required to be set in the context of adopted planning policy and therefore this CIL review has been informed by the policy in the adopted Core Strategy.</p> <p>In future the Exeter Plan will be informed by an additional viability evidence base which would take account of the amended CIL rates proposed here together with the cost implications of emerging planning policy requirements (e.g. in relation to site specific infrastructure or zero carbon measures. Furthermore, in future, following the adoption of the Exeter Plan, there may be a need to review CIL charges again or take into consideration the Government proposals for an Infrastructure Levy.</p> <p>No revision to proposed rates required.</p>
Marc Hoenen NHS Property Services	<p>Thank you for the opportunity to comment on the above document. The following representation is submitted by NHS Property Services (NHSPS).</p> <p>Foreword</p> <p>NHSPS is wholly owned by the Department of Health and Social Care. NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p>About NHS Property Services</p> <p>In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.</p> <p>NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they</p>	<p>Comment noted</p> <p>The Government has made amendments to the CIL Regulations, 1 September 2019. These identify the replacement of Regulation 123 lists with an 'annual infrastructure funding statement' –the first such statement was published by the Council in December 2020.</p> <p>The amended Regulations allow authorities to use funds from both CIL and planning obligations to pay for the same piece of infrastructure, regardless of how many planning obligations have already contributed towards it.</p> <p>No revision to proposed rates required.</p>

Name	Response	ECC comment
	<p>help deliver estate transformation.</p> <p>An important part of this is ensuring the NHS continues to receive S106 and Community Infrastructure Levy (CIL) developer contributions to mitigate the impacts of growth and help deliver transformation plans.</p> <p>CIL Charging Schedule and health infrastructure</p> <p>The Exeter Community Infrastructure Levy Draft Charging Schedule outlines the proposed CIL rates for differing development types. NHSPS supports the securing of CIL monies from development for infrastructure, noting that this ensures sustainable development, which aligns with both national and local plan policies. The use of financial viability assessments to ensure the adopted CIL rates do not render development unviable is further supported.</p> <p>NHSPS endorses the securing of CIL monies from residential developments, however notes that the Draft Charging Schedule does not include a rate for flatted residential homes. NHSPS highlight that residential developments resulting in new homes have an impact on healthcare infrastructure, and therefore requests that a rate be applied to flatted residential homes.</p> <p>With regards to the provision of medical or healthcare services, NHSPS requests that it be made clear that a nil CIL rate be adopted, as this will facilitate the provision of healthcare infrastructure within the City of Exeter.</p> <p>Partnership working between NHS and the Council</p> <p>The delivery of health infrastructure including new purpose-built healthcare infrastructure to mitigate the impacts of development requires extensive capital funding. This means significant funding secured through CIL allocations for health should be anticipated over the Local Plan period. The NHS, Council and other partners must work together to plan the infrastructure and necessary funding required to support the projected housing development and related population growth across the borough. Continued partnership working with the Council is encouraged to help secure the appropriate infrastructure to support sustainable development in the borough. A vital part of this is ensuring that the NHS has the resources required to develop additional healthcare infrastructure where necessary. This means updates to the Infrastructure Delivery Plan, and the capital allocation process for the Community Infrastructure Levy must support and result in funding allocations towards health care infrastructure to ensure the Council meets the objectives of the Local Plan as a whole.</p> <p>Conclusion</p> <p>NHSPS supports charging CIL to ensure development is sustainable, noting that the provision of health infrastructure should be supported through nil charging rates on healthcare developments. The NHS and Council should work collaboratively to ensure the delivery of vital healthcare infrastructure, including access to CIL funds for the delivery of health infrastructure projects.</p> <p>NHSPS would welcome further engagement in relation to the above comments on the draft community infrastructure levy charging schedule. Please contact us at <a href="mailto:town.planning@property.nhs.uk">town.planning@property.nhs.uk</a></p>	
Phyllida Brown	<p>Please give due consideration to the needs of low income families to access affordable homes with outside space for children to play, within the boundary of the city centre and the city boundary shown above.</p> <p>The risk of focusing on co-living units and an apparently strong incentive to developers to build these, is further to crowd out such families - with a serious impact on children, working parents on low wages, climate (the further out you make families go to find affordable homes, the more journeys to work will depend on cars/buses and not bikes/walking). Please make this policy joined-up with your environmental plans, healthy city plan etc.</p>	<p>Comment noted</p> <p>ECC adopted a Supplementary Planning Document (SPD) on Affordable Housing in April 2014.</p> <p>The SPD is a material consideration in the determination of planning applications. Its contents will need to be taken into consideration from the earliest stages of the development process, including in the purchase of sites and the negotiation and preparation of residential schemes.</p> <p>No revision to proposed rates required.</p>
Anonymous	<p>Large blocks of accommodation of any kind have a dramatic impact on the personality and attractiveness of a city. If ECC anticipates there will be much interest from developers of any of these large types of development, much stronger planning policy would be needed to be in place in advance of applications being submitted. We need to learn from the disastrous influx of PBSA that have hollowed out communities, making living near the centre so unattractive that to many of those who contributed to make and sustain a community neighbourhood, have moved away. At the same time, those across the City are heard frequently bemoaning the sad demise of the City's character and architectural heritage. New development must enhance the City scape; nothing less</p>	<p>Comment noted</p> <p>The Liveable Exeter Place Board adopted a shared vision in 2019. Partners both public and private sector are working together to achieve this vision.</p> <p>No revision to proposed rates required.</p>

Name	Response	ECC comment
	<p>than this can be acceptable. ECC has a tremendous responsibility to get it right.</p> <p>What vision for Exeter has informed the proposals?</p> <p>Liveable Exeter's vision is meant to be at the heart of what the city is seeking to achieve. Key to it is investment into communities and neighbourhoods as the key building block of the city. If the City Council is serious about Liveable Exeter the CIL rates must reflect what it is seeking to achieve, for example by encouraging applications for good quality new homes of appropriate scale at the heart of communities such as St James, St David's and Newtown which have been hollowed out by student housing over the past two decades.</p> <p>Has Liveable Exeter's vision been publicised well enough for residents to be aware of it, understand it and had the chance to buy into it, or oppose it? In my view the answer is that few are aware and even fewer have considered how such a vision would be realised. If they knew maybe far more would recognise the importance of this CIL review because of the influence it is designed to have on proportion of various types of development across the Exeter area.</p> <p>According to the Vision 2040, 'Urban planning will protect and enhance Exeter's exceptional natural and historic environment, safeguard its iconic landscape setting, and encourage high-quality design that complements and enhances the city's heritage. It is vital that wise decisions over the CIL structure are made now, if there is any chance of the planning system being able to achieve this vision. If it encourages too much of any kind of development, so that more applications are received of this type than are needed and welcomed, with too few of those which would be of greatest value to the people of Exeter and the realisation of the Vision, the LPA will once again bemoan the fact that it can only make decisions on the applications that are submitted, not dictate what it would like. The CIL structure is one chance to help dictate which applications come forward. Use it wisely!</p>	
<p>James McMurdo McMurdo Client Group</p>	<p>Introduction:</p> <p>On behalf of our client group, we submit representations to the ECC Draft Community Infrastructure Levy (CIL) Charging Schedule (schedule). We also refer to the emerging Draft Outline ECC Local Plan (plan). Our client group understands that the Community Infrastructure Levy (CIL) charge is currently paid to the City Council by some forms of new development when it receives planning permission, to ensure that the impact of new development is managed appropriately. Our client group acknowledges that the Council already operates CIL but the rates were set in 2013 and need to be reviewed. Whilst there are elements of the schedule that our client supports, in this response we raise key issues herein.</p> <p>Relationship with the Outline Draft ECC Local Plan:</p> <p>The Exeter Plan (to 2040) is currently at Draft Outline stage. The plan was consulted on between 26 September 2022 and 19 December 2022. We made comments on it stating that its vision of providing homes on high performing employment land would neither be viable nor deliverable; we said that if its vision cannot be shown to be viable and deliverable, the plan, unfortunately, won't be found sound. We stated that viability experts will contend that housing development on high performing employment land in Exeter would be unviable and undeliverable even if such development made zero planning obligations contributions (including CIL). In this context, it is considered that, with the plan at such an early stage, it would be premature to consult on and approve new CIL rates and charging zones for the City because the Council cannot possibly know if the CIL rate it sets would undermine the plan and its vision. i.e., the CIL rate should be based on viability evidence on the redevelopment of high performing employment land to housing led mixed use development. Taken on, to adopt a new CIL charging schedule now with a plan, which depends on the viability and deliverability of residential led mixed use development on high performing brownfield employment land, would affect whether the plan could be found sound by an Inspector at an Examination in Public (EiP). The EiP process will robustly assess the evidence behind the fundamental planning approaches within the</p>	<p>Comment noted.</p> <p>CIL rates are required to be set in the context of adopted planning policy and therefore this CIL review has been informed by the policy in the adopted Core Strategy.</p> <p>In future the Exeter Plan will be informed by an additional viability evidence base which would take account of the amended CIL rates proposed here. Furthermore, in future, following the adoption of the Exeter Plan, there may be a need to review CIL charges again or take into consideration the Government proposals for an Infrastructure Levy.</p> <p>The proposed CIL rates are based on viability evidence as demonstrated by the supporting documentation provided with the consultation.</p> <p>No revision to proposed rates required.</p>

Name	Response	ECC comment
	<p>plan, and critically also the viability and its vision.</p> <p>CIL Rates: It is stated that proposed CIL rates have been determined based on the economic viability of new development and available background evidence. Our client group disputes this. Here we would restate that it would be bizarre for ECC to approve a schedule that is not based on the viability and deliverability of a plan which has been robustly tested at Examination in Public (EiP). Our client group thanks you for the opportunity to comment and we look forward to further positive dialogue as the schedule progresses.</p>	
<p>David White Devon and Cornwall Police</p>	<p>We have no comments regarding the proposed changes to the charging schedule. Our desire is to see policy changes that support the collection of CIL for contributing towards police infrastructure, be that real estate or other associated infrastructure, required as a result of residential or other development. The authority will be aware that the Home Office grant and council tax precept only covers the police's revenue costs. Residential development and the associated population growth increases the demands on our infrastructure and this needs to be recognised in the same way that other infrastructure is, such as health, education, open spaces and highways. We appreciate that this might be best captured in a local plan policy document or the infrastructure development plan / list and we would welcome the opportunity to further this discussion.</p>	<p>Comment noted</p> <p>The Government has made amendments to the CIL Regulations, 1 September 2019. These identify the replacement of Regulation 123 lists with an 'annual infrastructure funding statement' –the first such statement was published by the Council in December 2020. The amended Regulations allow authorities to use funds from both CIL and planning obligations to pay for the same piece of infrastructure, regardless of how many planning obligations have already contributed towards it.</p> <p>No revision to proposed rates required.</p>
<p>Gert Vonhoff Exeter Civic Society</p>	<p>Before going into any specifics, we want to comment about the poor presentation of the consultation without any information from ECC to explain why changes are being made, any summary of why rates are proposed, other than 'it's time for a review'. The many questions raised on the Commonplace platform are an indicator that others had similar difficulties. And not everybody had the time or made the effort to read through the many accompanying documents; others may not even have found them. General Points (added section to consultation document) Exeter Civic Society finds it important to raise some general points before commenting on the individual CIL rates.</p> <p>ECS welcomes the CIL Review which responds to changes and new products in the local property market. We agree that it is important to bring this in as temporary measure as soon as possible and not wait for the new Exeter Plan. However, as many of the homes that will be built up to 2026 already have planning approval or are going through the planning process at the moment, ECS wonders how much of an effect this review will have in the near future. We hope that a new CIL and Infrastructure Plan will be developed alongside the new Exeter Plan in 2023. We expect this current review will be basis for a longer standing CIL beyond 2026.</p> <p>It has to be taken into consideration that the data for the viability assessment is effectively two years old. House prices and rents have moved significantly over that period, so the rates should in any case be reviewed before implementation. The consultants anyway suggest annual updates. From the Background Information document, the updated Infrastructure Delivery Plan identifies from 2022 to the end of the plan period in 2026 £180m and a funding gap of £93m (para 2.5). Based on the proposed new charging rates and the continued rates, it is 'estimated that for the remaining plan period (to 2026) Exeter City Council could potentially receive £25m CIL revenue' (para 3.6). In our understanding, that still leaves a funding gap of £68m. In order to close this gap, we suggest making more use of identified CIL headroom.</p> <p>The viability study by Three Dragons argues overwhelmingly in economic terms when setting CIL rates: distinguishing between more established and (higher risk) new products. We, however, see CIL rates equally as a steering tool to develop property types Exeter needs most (as identified in the Draft Exeter Plan and</p>	<p>Comment noted</p> <p>An explanation for the proposed CIL changes is set out in the background paper, which was available alongside the other consultation documents.</p> <p>Annual indexation takes into account the changes in the housing market.</p> <p>Whilst there is some CIL headroom guidance requires a buffer and that CIL rates are not set at the margins of viability. The buffers allow changes in costs and values – e.g. changing finance rates, the implications of which are set out in Appendix A.</p> <p>The retail CIL rates are indexed up from the rates set in 2013 as required by the CIL regulations. These rates are not proposed to change.</p> <p>In general terms, CIL rates are required to be set in the context of adopted planning policy and therefore this CIL review has been informed by the policy in the adopted Core Strategy.</p> <p>In future the Exeter Plan will be informed by an additional viability evidence base which would take account of the amended CIL rates proposed here together with the cost implications of emerging planning policy requirements (e.g. in relation to site specific infrastructure or zero carbon</p>

Name	Response	ECC comment
	<p>related documents before). And yet the CIL suggestion sees a levy for flatted residential of £0. How can this then support CIL providing and raising essential funds to develop off-site infrastructure for the new sites, especially when high density flatted residential is planned to become the dominant type? ECS does not think a levy of zero rates is appropriate for flatted residential; we would replace it with a minimum charge. How high that should be is something we ask ECC to establish.</p> <p>ECS suggests the rates for BtR and Flatted Residential as currently laid out to be reviewed and raised to a level sufficient to ensure that the necessary community infrastructure can be provided to meet the new planning policies. These future new homes are expected to be low car ownership, and as a consequence they generate a need to significantly upgrade the walking and cycling infrastructure as well as public transport</p> <p>The proposed concentration on brownfield city centre high density development in the Draft Exeter Plan which favours flats might mean that Exeter risks recouping a low(er) level of CIL as the result of this review, when there already is a substantial funding gap. ECC should be doing some scenario planning on the proposed rates with this in mind if they have not already done so.</p> <p>For reasons laid out in the specific section of Co-living in our reply, we suggest to link Co-living to PBSA more closely. We see the low CIL rate suggested in this review for Co-living as problematic, as it incentivises already viable and profitable, but (for the majority of people) unaffordable to rent developments in very much the same areas which have been already flooded the PBSA in recent years. Adding further to highly transient communities in Exeter will not help ECCs efforts to create balanced communities.</p> <p>The CIL rates as suggested are set in relation to development type and development scale, different from other councils not in relation to geography. The reason for this is most likely the compact nature of the area ECC has to work with. There is one exception, retail outside the city centre. This makes sense as future growth in retail should not benefit from sites outside the city centre, as long as Exeter has a large number of retail units empty in the city centre. As the Draft Exeter Plan includes district centres into its wider definition of city centre, it would make sense to include these as well. A clear definition then would be needed.</p> <p>The viability assessment dismisses retirement developments as expensive and anomalous. However, they have been built in Exeter, presumably paying the residential levy and it would be difficult to understand why to rule out future payments from this category when they will make infrastructure demands and when it clearly can be afforded. There is no need to incentivise further development in this sector.</p> <p>In the light of the longer perspective, ECS thinks it would be time to reflect on carbon impact as an additional aspect for setting rates. We suggest a CIL rate reduction for net zero or negative carbon developments (with evidence). This would support this form of development which is needed to meet ECCs policy of net zero by 2030.</p> <p>With the unaffordability crisis in Exeter, ECC needs to find ways to substantially increase the proportion of affordable housing in the city. ECS thinks the review of the CIL rates can be used to this effect: we suggest a reduction of the levy if the amount of affordable and social housing substantially exceeds the national guidance (adopted by ECC) of seeking 20% of units at discount market rent; a staggered approach in levy reductions might be appropriate. It also has to be taken into consideration that the discount market rent (80% of market rent) in Exeter due to high market rents still provides a challenge for most buyers or renters.</p>	<p>measures. Furthermore, in future, following the adoption of the Exeter Plan, there may be a need to review CIL charges again or take into consideration the Government proposals for an Infrastructure Levy.</p> <p>The responses provided on the proposed rates reflect this overarching comment provided here. The Council has provided comments to these more in depth comments elsewhere in this report. However, it should be noted in general terms that CIL is not used a policy driver, rather this is the role of planning policy. This will develop in Exeter through the emergence of the Exeter Plan.</p> <p>No revision to proposed rates required.</p>
<p>Jamie Grant Persimmon Homes</p>	<p>The rates are broadly supported. Further clarity needed regarding proposed development at Alphington and potentially Markhams Farm / Peamore. Who will the CIL receipts benefit ultimately? Please notify the Company when there is a future opportunity to comment.</p>	<p>Comment noted.</p>

Name	Response	ECC comment
		<p>Exeter CIL rates will apply to developments within the city boundary at Alphington. Markhams Farm / Peamore are in Teignbridge and therefore Teignbridge CIL rates will apply.</p> <p>No revision to proposed rates required</p>
Kath Sidgwick Alphington Community Association	it would be good to see that all communities in the city benefit from the CIL money	<p>Comment noted.</p> <p>No revision to proposed rates required.</p>
Emma Townsend	<p>I submitted comments via the consultation page, but I wanted to provide an additional overall response. I hope that this is okay.</p> <p>Through the CIL, the council has the opportunity to influence the proposals which are submitted by developers through economics and profitability.</p> <p>The proposed scheme is general, with required payments based on development purposes. In order to steer developers towards proposals which make a positive contribution towards net zero and developing a different way of living in the city, it would be more effective to have different levels of CIL according to the future proofing of the development. For example, going beyond the 10% biodiversity net gain requirements or current basic building standards to install grey water recycling or have a zero-waste construction site. So where added value to the city is being proposed. A similar approach is used for water companies by OFWAT through Outcome Delivery Incentives to enable financial rewards by doing more than regulatory requirements and penalties for not doing so.</p> <p>I hope that this suggestion can be considered,</p>	<p>Comment noted.</p> <p>The measures to mitigate the impact of development on European sites is the top priority for the council in spending CIL, and CIL receipts are 'top-sliced' for this purpose.</p> <p>No changes to proposed charges required.</p>
Catherine Delafield	Needs to be aligned with Exeter goals and Neighbourhood Plans. Developers must be able to prove onward management and maintenance of use or penalties/repossession might apply.	<p>Comment noted</p> <p>No changes to proposed charges required</p>
Councillor Diana Moore-Co- Leader Progressive Group	<p>Based on a review of the viability assessment and community needs the Progressive Group is making the following recommendations for amendments to the proposed charging schedule:</p> <p>vi). 7. Because of the unaffordability crisis in the city the Council must increase the proportion of affordable units through planning policy and using the CIL rate as a tool. Lower rates for a higher proportion of affordable housing should be considered. Based on the national guidance the Council must set out a local definition of "affordable".</p> <p>viii). 9. With denser housing, with Flatted and Build to Rent as a key policy of the Liveable Exeter Strategy, sufficient levy should be charged to ensure the necessary community infrastructure can be provided to meet the new Plan's policies.</p> <p>ix). 10. A lower CIL rate for developers who bring forward net zero developments (with evidence), reflecting the current challenges to viability that zero development can sometimes present, would incentivise and enable this form of development necessary to meet the Council's own stated policy of net zero by 2030 and the Climate Change Act and other legal requirements.</p> <p>x). 11. We would request that the Inspector hears evidence rather than just receive written submissions. Reasons: a) The Introduction of a CIL charge for the development of so called "Co-living", a Build to Rent special type of accommodation is welcome as it currently contributes nothing, on the basis it is (sui generis) to the Community Infrastructure and should be so because of the additional burdens that increased levels of accommodation density will place on the local and wider community and services. It should be noted however, that there is no national or local policy for "Co-living". We have seen it presented in Exeter as Build to Rent, but with key</p>	<p>Comments noted.</p> <p>vi) The matter will be addressed through the ongoing work on the emerging Exeter Plan which will set out affordable housing requirements informed by the local housing needs assessment.</p> <p>viii) CIL rates are set according to viability not infrastructure requirements as is required by the Regulations.</p> <p>ix) CIL rates are set as informed by planning policy and the associated costs. The Council is unable to require specifications which are beyond current sustainable construction standards and CIL is not used to drive a specific policy outcome. Revised policy requirements will be set by the emerging Exeter Plan and through Building Regulations.</p> <p>x) Note request for an Examination Hearing. Many of the points made here are addressed by the comments above. Others will be taken into consideration through</p>

Name	Response	ECC comment
	<p>features of PBSA, including small, shared amenity spaces, small accommodation units, not meeting national technical space standards and for transient occupation. Consequently "Co-living" developments are identical in class, use, and style to PBSA while available anyone.</p> <p>It should be noted that the Strategic Housing Needs Assessment muddles "Co-living" and "Co-Housing" the latter has a defined meaning determined by the Co-Housing movement. So, it is Co-Living that we refer to in this response.</p> <p>b) The increase in the rate of the CIL for Purpose Built Student Accommodation is welcome.</p> <p>c) The Three Dragons report makes the point that the purpose-built student accommodation (PBSA) charging rate was set at a time when this form of developments was relatively untested, this point is also made in the strategic housing needs assessment produced for the Local Plan. The Planning Authority should learn from the difficulties that high numbers of high-density accommodation developments in particular neighbourhoods can and has caused. So, rather than the laissez-fair approach to "Co-living" recommended in the viability assessment statement, a strategic and managed approach using the CIL levy and planning policy together must be adopted. Indeed, the recommended approach is already undermined by the current number of "Co-living" applications, because of the viability and profitability of these types of developments as identified in the report.</p> <p>d) The current CIL Charging Policy, with discounted rates for purpose-built student accommodation (PBSA), has incentivised PBSA development. The incentivisation of PBSA, through lower rates compared to other class uses, has led to a proliferation of PBSA in city centre communities which will continue, in the form of "Co-living" in these areas for use by students and non-students together, if not managed through the CIL and other planning controls. Page 28 of the viability assessment says "Co-living" style developments are like purpose-built student accommodation blocks, and the viability assessment demonstrates that such developments can well afford to contribute towards the community infrastructure levy. Therefore, the CIL charging rates for "Co-living" must be comparable to the new PBSA rates (£150). The Student Accommodation SPG also sets out the basis for such an approach-see <i>Italics/underline</i>, which does not wholly limit PBSA for student use only: "3.3 New purpose-built student accommodation is normally in the form of cluster flats that share communal kitchen/lounge facilities or studios. These are usually limited to occupation by students only and may have lower standards of residential amenity than properties designed for longer-term occupation"  <a href="http://exeter.gov.uk/media/1746/final_spg_student_accommodation.pdf">http://exeter.gov.uk/media/1746/final_spg_student_accommodation.pdf</a></p> <p>e) Learning from the experience of PBSA developments, there is risk of "luxury-style" and unaffordable developments, an over-concentration of one type of accommodation designed for transient communities in small neighbourhood areas-when the goal of the current plan is to create balanced communities in areas where there are many HMOs and PBSA already. [See Exec summary point 4 page 5]. The report says that a review of the Core Strategy adopted in 2012 identifies the policies that have been reviewed. Policy H5 of the adopted local plan to create balanced communities, which has not been addressed and should be reviewed as it relates specifically to class uses. H5 of the adopted Exeter Local Plan states:  "HS: THE CONVERSION OF DWELLINGS TO FLATS, SELF-CONTAINED BEDSITTERS OR HOUSES IN MULTIPLE OCCUPATION AND THE DEVELOPMENT OF SPECIAL NEEDS OR STUDENT HOUSING WILL BE PERMITTED PROVIDED THAT:  .....  (b) THE PROPOSAL WILL NOT CREATE AN OVER CONCENTRATION OF THE USE IN ANY ONE AREA OF THE CITY WHICH WOULD CHANGE THE CHARACTER OF THE NEIGHBOURHOOD OR CREATE AN IMBALANCE IN THE LOCAL COMMUNITY;"</p> <p>This policy is significant, informing the supplementary planning document for purpose-built accommodation and works in tandem with "the Article 4 Direction" that restricts homeowners "Permitted Development" rights to use their property as houses in multiple occupation (HMOs) within Class C4 of the Use Classes Order for the occupation by students of other `transient people`" (slc).</p> <p>Large HMO`s are classified as sui generis so consideration should be given to reviewing this rate (currently zero) to align rates and planning policies. The introduction of a Sui Generis charge would not apply exceptions. However, policy H5 has not led to any significant change of class use away from HMOs and has led to an overconcentration of PBSA in particular areas within and adjoining the city centre and in the Article 4 direction area, "Co-living" compared to PBSA is not justified.</p> <p>f) There are further issues around zoning-which is covered in the report and a very small area is recommended.</p>	<p>either the work on the emerging Exeter Plan and/or the revised Article 4 work.</p> <p>No revision to proposed rates required.</p>



Name	Response	ECC comment
	<p>However, we would recommend the Article 4 area is a CIL charging zone (subject to any future changes) within which "Co-living" and PBSA should attract an uplift in the CIL rate to limit the number of HMOS, PBSA and "Co-living" developments in the zone. The CIL and planning policy must clearly connect, and the report demonstrates the viability and profitability of such developments.</p> <p>g) The CIL proposals for a low "Co-living" rate could lead to an oversupply of single room accommodation, which while needed in the short term will have long term consequences. The Housing needs assessment says: "...the number of `Other` households headed by someone aged 15-24 years is projected to rise by 690 households in the same timeframe, with a rise of 50 households for those aged 25-34 years." With the CIL likely to be in place for a number of years an oversupply of "Co-living" could mean that young people are prevented from not only from living in, but also establishing relationship and setting up homes within the city. If "Co-living" is to work it needs to be founded on proper policy, a sound funding infrastructure, and be affordable. Furthermore, the rent per month for build to rent is expected to be £1,250. Page 17 suggests that "Co-living", a specialist form of build to rent, will have `bed spaces` turnover one or 2 times a year and therefore the rent is set at 48 weeks. The market value suggests that PBSA for cost of room, ensuite is £164 a week and for "Co-living", £237 which makes the rent for a "Co-living" place £11,883 pa. So the Council does not need to offer additional incentives to build profitable but unaffordable developments which will further exacerbate the City's lack of affordable housing.</p> <p>h) P9 of the document points out that the council follows national guidance on Build to Rent seeking 20% of units as discount market rent {defined as affordable} i.e. 80% of market rent. Because of the unaffordability crisis in the city the Council must increase the proportion of affordable units through planning policy and using the CIL rate as a tool and based on the national guidance set out a local definition of "affordable". Otherwise, we get both reduced levels of community infrastructure, but we also get reduced levels of affordable housing. That is not considered by the review, but the affordability crisis must be considered by council, and planning policy combined with the community Infrastructure levy is key to this. The rates for Build to Rent and Flatted development should be reviewed (upward), with a view to a reduction in the levy if more than 20% of units are affordable or social housing.</p> <p>i) Build to rent and flats discussed on page 26 and 27 suggests that the taller and larger schemes are less viable than medium-sized ones. As a result, the CIL rate is skewed to support taller, denser flats, but without the corresponding investment in the community infrastructure that makes high density living, Liveable. Nor does it relate to local planning policy which currently emphasises Exeter as a `low rise` city and the emerging plan Liveable Exeter Principles, which promote denser development, but doesn't say must be tall. What consideration will be given to the local plan as a result of this finding? With denser housing, through Flatted and Build to Rent as a key policy of the Liveable Exeter Strategy, a levy and sufficient levy should be charged to ensure the necessary community infrastructure and affordable can be provided to meet the new Plan's policies.</p> <p>j) There is reference in the report to net zero carbon emission development on P29. This points out that future changes to building regulations to move towards carbon net zero development have been indicated for 2025 whilst it is unclear as to how these will be brought forward. A lower CIL rate for developers who bring forward net zero developments, reflecting the current challenges to viability that net zero development can sometimes present, would incentivise and enable this form of development necessary to meet the Council's own stated policy of net zero by 2030 and the Climate Change Act requirements. This point was, after all, in the procurement brief for the review of the CIL.</p> <p>k) The review says that connection to district heating isn't taken into account because there is none in the city. If this is not accounted for then developers will not make any financial contribution to it, arguing it's not viable. As both the current and emerging Local Plan is advocating a Fabric First approach, which is built to Passivhouse standards, means that no external heating is likely to be required and certainly not on the scale of a district heating system, then a wholesale local plan policy commitment to the connection of NEW developments (rather than harder to heat existing buildings) to large scale district heating should be abandoned or dealt with through the S106 process.</p>	

Name	Response	ECC comment
<p>Gary Parsons Sport England</p>	<p>Thank you for consulting Sport England on the above Local Plan document. We are supportive of its aims for development contributing to community sport and recreation facilities.</p> <p>Sport England is the Government agency responsible for delivering the Governments sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p> <p>Sport England Strategy Uniting The Movement (2022-32) identifies key changes in the delivery of the strategy: A 10 year vision to transform lives and communities through sport and physical activity. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. Our five big issues are where we see the greatest potential for preventing and tackling inequalities in sport and physical activity. Each one is a building block that, on its own, would make a difference, but together, could change things profoundly:</p> <ul style="list-style-type: none"> <li>o Recover and reinvent</li> <li>o Connecting communities</li> <li>o Positive experiences for children and young people</li> <li>o Connecting with health and wellbeing</li> <li>o Active environments</li> </ul> <p>Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance link here</p> <p>The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:</p> <p>PROTECT sports facilities from loss as a result of redevelopment  ENHANCE existing facilities through improving their quality, accessibility and management  PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Governments national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti-social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.</p> <p>The following comments are provided within the context of:</p> <p>The National Planning Policy Framework (Department for Levelling Up, Housing and Communities, 2021).  Sport England's Planning for Sport webpages (2023).</p> <p>1. Local Plan &amp; Evidence Base</p> <p>The National Planning Policy Framework (2021) states:</p> <p>98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</p>	<p>Comments noted.</p> <p>Much of the comments provided relate to planning policy matters outside of the scope of the CIL review. They will be taken into consideration through the work on the emerging Exeter Plan. This will include infrastructure planning work.</p> <p>With regard to how CIL is spent, the Government has made amendments to the CIL Regulations, 1 September 2019. These identify the replacement of Regulation 123 lists with an 'annual infrastructure funding statement' – the first such statement was published by the Council in December 2020. The amended Regulations allow authorities to use funds from both CIL and planning obligations to pay for the same piece of infrastructure, regardless of how many planning obligations have already contributed towards it.</p> <p>No provision to proposed charges required.</p>

Name	Response	ECC comment
	<p>Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.</p> <p>We note the Councils current work on their Playing Pitch Strategy to provide an evidence base for pitches and tennis courts. We have not endorsed a recent and compliant Built Facilities Strategy.</p> <p>We recommend that by up to date Sport England means undertaken within the last 3 years for a Playing Pitch Strategy, and within the last 5 years for a Built Facilities Strategy.</p> <p>We would expect work as set out in the methodology to be undertaken annually before the work is reviewed and completely re-started after 3/5 years. Sport England are more than happy to advise the Council on what and when things need to be reviewed.</p> <p>2. Planning Obligations/Community Infrastructure Levy (CIL) to Sport</p> <p>Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc.) as well as playing fields and multi-use games courts.</p> <p>All new dwellings in Exeter in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.</p> <p>The evidence base as mentioned in (1) above should inform the Infrastructure Delivery Plan (IDP) and / or CIL and any future changes to CIL/s106.</p> <p>If you would like any further information or advice please contact me at the address below.</p>	
Paul Ditchburn	<p>I don't understand the council charging these levies for infrastructure as no sooner the developments are approved and built, the promised essential infrastructure is not completed. Surely infrastructure should be put in place before the developments can be built!</p> <p>Case in point. The terrible mess that we find ourselves having to deal with in Pinhoe presently and which has been getting worse and worse over the previous five years or so!</p> <p>The new Lidl development is, as I'm sure you're all aware, causing terrible problems for the residents and people going about their daily business. The volume of traffic which has now been squeezed onto our existing roads has increased tenfold, I'd imagine in the last five years, following the extensive developments in Pinhoe and Western East Devon which borders Pinhoe.</p> <p>An example - Veiny Bridge and Chancel Lane are simply not fit for the amount of traffic that uses it, even before the Lidl development and the ensuing extra traffic.</p> <p>I honestly believe the original plan of the road up through Eastern Fields needs to be reassessed, as originally planned and the levy previously charged on The Harrington's Development be used for the infrastructure improvements planned. I understand that the connection is in place in The Harrington's but simply not connected to Exhibition Way as planned because it was shelved.</p> <p>The majority of the traffic coming up Chancel Lane turns left into Harrington Lane, to go down through Cheynegate and onwards to Beacon Heath and further. This also applies in reverse obviously!</p> <p>The bridge at Venny Bridge also now handles the majority of the traffic for Thursby Walk, The Harrington's and</p>	<p>Comments noted.</p> <p>Much of the comment is outside of the scope of the CIL review.</p> <p>Issues regarding infrastructure planning will be considered as part of the work on the emerging Exeter Plan. This will identify the infrastructure needed to support development and community needs.</p> <p>No provision to proposed charges required.</p>

Name	Response	ECC comment
	<p>now the new Quarry 400 home development. We also have the 40 Verto Homes going up off of Pulling Close.</p> <p>Moving this traffic to this previously planned new road in The Harrington's and spurred onwards up to the top of Beacon Heath out of the top of Eastern Fields would alleviate the amount of traffic using Chancel Lane, Venny Bridge and Cheynegate by bypassing it. Of course this would also improve the flow at the new Lidl junction, when it's completed.</p> <p>I do understand the need to maintain green open spaces but Eastern Fields is a vast area that I believe a certain section could be given up to the new road. As it is presently, huge areas are inaccessible due to the huge numbers of overgrown shrubs. Hardly open space!</p> <p>There is a pot of money somewhere from all these previous developments levies that have been imposed on previous local developments that should be used for this new road improvement, supplying the necessary infrastructure instead of it simply being shelved. Where has that money gone?</p> <p>I also understand that this will upset the people who fought to keep Eastern Fields as it is but Pinhoe as a whole, in my opinion as well as many others also, is now suffering big time because of this lack of previously planned infrastructure!</p> <p>PLEASE CAN THE PREVIOUSLY PLANNED INFRASTRUCTURE THAT WAS PLANNED FOR THESE DEVELOPMENTS (WHICH HAVE BEEN OAI D FOR BY PREVIOUS LEVIES) BE REASSESSED AND PUT IN PLACE AS SOON AS POSSIBLE</p> <p>Pinhoe is currently in a terrible mess and with the existing new developments, the currently planned developments and the continued developments being approved are only making things worse day by day.</p> <p>Please spend these levies on what they were designed for!</p>	
Michael Carter	The city is growing unsustainably regarding transport.	Comment noted No revision to proposed charges required
Mark (no surname provided)	Students do not pay Council Tax. CIL on student accommodation should be levied at such a rate as to compensate for this e.g. Band D Council Tax, less single occupancy discount, times number of student rooms, times design life of building.	Comment noted No revision to proposed charges required
Emma Townsend	The clear economic influence from the CIL charging scheme on the developer choices needs to be scenario tested to see if it undermines the aspirations of the new Exeter Local Plan.	Comment noted. The proposed CIL rates are based on viability evidence Further planning policy to support development of high quality in appropriate locations will be provided in the emerging Exeter Plan. This will encourage a variety of different forms of residential development to meet the needs of the community. No revision to proposed charges required.
Stuart (no surname provided)	Please stop making it easy for developers to build sub-standard rubbish just to claim the numbers of units that you want to achieve!	Comment noted No revision to proposed charges required
Ian Harrison	This levy is really important to the wider community of Exeter. It is a unique source available to the community for, amongst other uses, new buildings (e.g. Belmont Park Community Centre) and must be promoted and fought for vigorously by city officers.	Comment noted No revision to proposed charges required
Chris Pope	Additional comments to my previous submission. There should be either an additional levy or a reduction to reflect the developments carbon impact. For example houses that are EPC A with good insulation, zero carbon	Comment noted.

Name	Response	ECC comment
	heating, solar panels etc. cost more than EPC C developments - the CIL should be adjusted to encourage more zero or negative carbon development.	The proposed CIL rates are based on viability evidence which take on board policy requirements and their associated costs – this covers matters such as environmental performance of buildings.  No revision to proposed charges required.
Dr David Treharne	Flexibility needs to be built into all planning. Read 'Victorian Exeter' and see if the problems that the Victorians faced were resolved by their planning decisions, and that the City faces now as a result of their choices - for example road infrastructure.	Comment noted  No revision to proposed charges required
Chris Pope	CIL received should not be spent on projects that ought to be funded by National Highways (Sandy gate reconfiguration £837,831) or on routine maintenance that ought to form part of the councils normal budget (Public conveniences and play parks maintenance £160,000)	Comment noted  No revision to proposed charges required

## Appendix A – finance rate sensitivity test

### Approach

1. In response to comments made in the consultation and changing market conditions Exeter City Council consider it helpful to the examination to explore the impact of alternative finance rates on viability.
2. The viability evidence base uses a 6% all-in finance rate applied to all the typology cashflows according to the development period. On a conservative basis no credit finance rate is included, and it is assumed the whole development is debt funded.
3. Although no alternative rates were suggested in the consultation responses, for the purposes of this sensitivity testing nominal rates of 8% and 10% are used to reflect the current and potential future rises in the base rate.
4. These alternative rates are applied to the testing for flatted, build-to-rent, co-living and purpose built student accommodation. All of the other testing assumptions are unchanged.

### Findings

**Table A1 finance rate sensitivity test results**

Typology	Total headroom available for CIL £/sq m			Proposed CIL rates £/sq m	
	Original viability findings (6% finance rate)	Sensitivity test 1 – 8% finance rate	Sensitivity test 2 – 10% finance rate		
Res 1 - 15 dwgs	£44	-£8	-£60	£0	0% of GDV
Res 2 - 15 dwgs	£1	-£52	-£105	£0	0% of GDV
Res 3 - 75 dwgs	£87	£38	-£11	£0	0% of GDV
Res 4 - 150 dwgs	-£59	-£112	-£169	£0	0% of GDV
Res 5 - 350 dwgs	-£20	-£64	-£119	£0	0% of GDV
BtR 1 - 150 dwgs	£313	£270	£223	£50	1.5% of GDV
BtR 2 - 350 dwgs	£359	£330	£297	£50	1.5% of GDV
BtR 3 - 350 dwgs (high density)	£53	£6	-£55	£50	1.6% of GDV
PBSA 1 – 40 units	£669	£621	£574	£150	4.2% of GDV
PBSA 2 – 100 units	£584	£512	£440	£150	4.2% of GDV
PBSA 3 – 150 units	£508	£411	£315	£150	4.2% of GDV
CoL 1 – 40 units	£343	£276	£210	£50	1.1% of GDV
CoL 2 – 100 units	£242	£142	£42	£50	1.1% of GDV
CoL 3 – 250 units	£140	£6	-£127	£50	1.1% of GDV

### Commentary

1. The higher finance rates result in for sale flats becoming marginal or unviable. This supports the setting of a £0 CIL rate for this type of development.
2. The majority of the remaining development remains viable under higher finance rates and so overall, the proposed CIL rates remain appropriate under both sensitivity tests.
3. The larger higher density build to rent typology is vulnerable to higher finance rates, noting that the proposed CIL rate as a proportion of GDV remains less than 2%. Potentially, the form of development for this type of scheme may have to amend to reduce peak debt, either by phasing or reducing height.
4. The larger co-living typology is also vulnerable to higher finance rates, noting that the proposed CIL rate as a proportion of GDV remains just over 1%. Again, the form of development for this type of scheme may have to amend to reduce peak debt.
5. Not all schemes will be 100% debt financed, and so exposure to this risk will vary. In addition, actual finance rates are likely to vary between developers.

## **Appendix B - Off-line responses**

Offline responses – where we have been able we have split the text provided in the offline responses into the appropriate topic area/section in the main consultation document. A link to the responses (as submitted) below will be available on our website.

Blocwork LLP  
Emma Townsend  
Exeter Civic Society  
Grainger PLC  
Growen Estates  
Martin Redfern  
McLaren Property  
McMurdo  
NHS Property Services  
Progressive Group  
Sport England