Community Infrastructure Levy Consultation Responses (Your Voice Bucks Survey responses)

Consultation respondent 1

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
All developments should be charged something -- even if the rate is low.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
I think they should pay something also, they do cause significant impact to communities and the county.

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I live in Buckinghamshire; I work in Buckinghamshire; I work for Buckinghamshire Council

Consultation respondent 2

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

I don't know

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Strategic sites will put a big strain on neighbouring parishes so some contribution shoukd be made to that parish which the site lies within.

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
I don't know

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
I don't know

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Under the S106 the parishes have to say what they want to spend the money on before the application is approved. Will CIL be administered in the same way? It seems ridiculous as often they will ask for something but don’t want the planning to go ahead the first place.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I live in Buckinghamshire; I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 3

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

I don't know

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

The charging schedule should be consistent across all sectors of Bucks rather than as present all different schemes. The charge shouldn't be so high for dwellings, given the substantial housing shortfall.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

I don't know

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

I believe that those areas affected by SAC should be proportionately lower. But again, the rate is getting substantially high across the entire Bucks district, which is evidently putting people off.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

I think there should be a blanket approach to all development, i.e., either encourage it or not.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

All public bodies, no-for-profit and disabled projects etc should be exempt

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Again, this has to be proportionate to the scale of operations - why should small-scale developments have to pay, whereas the greatest impact and funds come from larger-scale developments?

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
My thoughts are that a comprehensive Bucks policy should be enacted rather than a disjointed one.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Why not apply a doubling factor to those outside the main town areas, but then that would prohibit development outside the main town areas - should we be doing this across all the towns, whichever tier one is in?

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
I believe this to be consistent across all LPAs and in compliance with CIL regs.

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
No

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
An infrastructure funding gap isn't what CIL will provide, as what it can be spent on is very limited and doctated by statute. It should therefore not be linked to it. This cannot be the only reason for providing a charge schedule.

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Rather than doing this peacemeal the Council should review the entire CIL charging throughout and reset the levels as its becoming increasingly prohibitive for developments - the CIL team also dont seem to be applying it consistently with Govt guidance.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I work in Buckinghamshire

Consultation respondent 4

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
No

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?

I live in Buckinghamshire

Consultation respondent 5

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Yes

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?

I live in Buckinghamshire; I work in Buckinghamshire; I work for Buckinghamshire Council

Consultation respondent 6

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

We agree with the introduction of a CIL charging schedule to bring a more consistent approach into place across Buckinghamshire but the fundamental principle of CIL, as set out in Community Infrastructure Levy Regulations 2010 and supporting guidance, is that rates must be set with regard to economic viability. We object to the proposed application of Community Infrastructure Levy (CIL) to agricultural buildings at £25/sqm.

Farming operates on structurally low and volatile margins from exposure to external pressures (commodity prices, weather, input costs) and increasing environmental and regulatory compliance costs. The imposition of CIL for agricultural buildings adds another upfront fixed cost that does not take into account that the buildings are not market led developments but operational infrastructure that do not generate a direct income or uplift in land values in minor or major commercial and residential schemes.

The National Planning Policy Framework supports a prosperous rural economy and sustainable growth and diversification of agricultural businesses. Applying CIL to essential agricultural buildings risks undermining these objectives.

CIL is intended to fund infrastructure necessitated by development. However, most agricultural buildings generate negligible additional population , do not materially increase demand on schools, healthcare, or transport networks and tend not to intensify use. As such, there is limited justification for requiring contributions toward infrastructure typically associated with residential or commercial growth.

The DSP report identifies that there is insufficient viability scope to support positive CIL charging for “other development” so recommends that nil rating (£0 psqm) or at most a nominal charging rate for minor developments. Whilst £25psqm may not amount to a lot for small scale developments, farm buildings by their very nature require large floor areas e.g. a 1500sqm grainstore or cattle shed would attract a CIL charge of £37,500 under the current proposals.

Unlike commercial or residential developers, farms cannot absorb or offset costs through sales or letting values. The proposed charge would therefore have a disproportionate impact on rural businesses, contrary to the principle that CIL should not threaten the deliverability of development across the area.

It is respectfully requested that agricultural buildings are set at a zero (£0) CIL rate, or an explicit

exemption is introduced for farm buildings reasonably necessary for the purposes of agriculture to ensure that essential rural development remains viable and deliverable.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
The fundamental principle of CIL, as set out in Community Infrastructure Levy Regulations 2010 and supporting guidance, is that rates must be set with regard to economic viability. We object to the proposed application of Community Infrastructure Levy (CIL) to agricultural buildings at £25/sqm.

Farming operates on structurally low and volatile margins from exposure to external pressures (commodity prices, weather, input costs) and increasing environmental and regulatory compliance costs. The imposition of CIL for agricultural buildings adds another upfront fixed cost that does not take into account that the buildings are not market led developments but operational infrastructure that do not generate a direct income or uplift in land values in minor or major commercial and residential schemes.

The National Planning Policy Framework supports a prosperous rural economy and sustainable growth and diversification of agricultural businesses. Applying CIL to essential agricultural buildings risks undermining these objectives.

CIL is intended to fund infrastructure necessitated by development. However, most agricultural buildings generate negligible additional population , do not materially increase demand on schools, healthcare, or transport networks and tend not to intensify use. As such, there is limited justification for requiring contributions toward infrastructure typically associated with residential or commercial growth.

The DSP report identifies that there is insufficient viability scope to support positive CIL charging for “other development” so recommends that nil rating (£0 psqm) or at most a nominal charging rate for minor developments. Whilst £25psqm may not amount to a lot for small scale developments, farm buildings by their very nature require large floor areas e.g. a 1500sqm grainstore or cattle shed would attract a CIL charge of £37,500 under the current proposals.

Unlike commercial or residential developers, farms cannot absorb or offset costs through sales

or letting values. The proposed charge would therefore have a disproportionate impact on rural businesses, contrary to the principle that CIL should not threaten the deliverability of development across the area.

It is respectfully requested that agricultural buildings are set at a zero (£0) CIL rate, or an explicit exemption is introduced for farm buildings reasonably necessary for the purposes of agriculture to ensure that essential rural development remains viable and deliverable.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
I agree that different CIL rates proposed to be applied to different zones is appropriate and justified. However as per the answer to Q2 agricultural development should be exempt to ensure that essential rural development remains viable and deliverable.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
The DSP report identifies that charging CIL on developments other than residential and commercial can present viability challenges and recommended that a £nil charge be adopted. The principles of assessment of community halls and exemption of publicly funded or not-for-profit organisation should be applied to agricultural buildings wherein many of the determining factors are aligned with the assessment within the DSP report particularly at 3.10.9 and 3.11.8.

The DSP report identifies that there is insufficient viability scope to support positive CIL charging for “other development” so recommends that nil rating (£0 per sq. m.) or at most a nominal charging rate for minor developments. The Council proposes to charge a "nominal charging rate" of £25psqm for "other development" which may not amount to a lot for small scale developments, however farm buildings, which would fall within this category, by their very nature require large floor areas e.g. a 1500sqm grainstore or cattle shed would attract a CIL charge of £37,500 under the current proposals.

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
I don't know

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Lucy Jane Deborah Stone

Which of the following describe you?
I work in Buckinghamshire; I represent or own a business in Buckinghamshire; I am a developer or planner in Buckinghamshire

Consultation respondent 7

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

The proposal is too complex. Suggest that CIL rates be equalised between small and large developments and replace S106 as far as legislation permits.
There is too much acceptance that high rates of CIL will make housing development uneconomic; this should not be the case. Instead high rates of CIL would result in lower prices paid for land in the first place. The net effect being that landowners make less profit on land sales to developers and the Council (and therefore tax payers, locally and nationally) bear a smaller proportion of the infrastructure costs.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

See Q2 above

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure

facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
All should pay the same , otherwise tax policy is being used to skew an otherwise free market. Who really benefits from a nil rate of CIL? ultimately it's the land owner selling the land for the development who can extract a higher price. Is that really who we want to benefit from a Public Policy decision?

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
I don't know

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Andrew Jones

Which of the following describe you?
I live in Buckinghamshire; I am an elected representative in Buckinghamshire

Consultation respondent 8

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Yes

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
No

Do you agree with the proposed instalments policy? (Free text)
Make developer's pay up front or they'll simply go bust owning the levy moneys,

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?

I live in Buckinghamshire

Consultation respondent 9

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
No

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
No

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
It would appear that the whole policy is physically and financially negative in respect to the charging policy of only 400 houses and could effectively undermine or deliberately undermine neighbourhood plans who would receive 25% of uplift under the policy.
It's if the council has deliberately set out to ensure their little funding goes to communities which have a maid neighbourhood plan by only paying funding booked 400 which allows developers to game the system and disadvantage the communities receiving development. I cannot imagine what drove this forward it seems completely wrong, and if you are going to

introduce a charge system, it should be for the whole the county and they shouldn't be different charges systems in the south to the north the whole thing looks like it's to encourage development in the north by creating a cheaper place to build. It's almost to their local authority considered the north as its development ground and by introducing easier and cheaper to build policies within the charging schedule it's like you want to build over all the green areas in North Buckinghamshire, with a charges schedule clearly to disadvantage parishes and large towns Aylesbury and Buckingham by treating them differently to other communities. And doesn't look very just fair and the system is coming far too early before you know what the infrastructure needs are of the local authority within development plan for Buckinghamshire and seems to be divisive in its attitude second one community against another in North Buckinghamshire on the charging schedule. . You really need to think again with built-in inequality and furnace towards large towns how would you expect people to react? Is this a political decision because of the policies and the fiscal information draws one to that conclusion? And if that is the conclusion that means the local authority is not governing the county equally and providing inequality as a baseline in its assumptions in introducing roofing infrastructure level and you really need to go away and think again if you don't it will be clear that you took a political choice against Buckingham and Aylesbury and will be remembered that if it's introduced an amended, or development not just about 400 should be charged infrastructure levy and large town in perishes should get all the money alluded tape in the principle of receiving 25% for parishes with a made neighbourhood plan and 15% to those that haven't, completely unfair and you've done nothing to demonstrate you wish to be fair and Will cause long-term ill Will towards Buckinghamshire council when developments go up and the local people who were told they would receive 25% only get it on properties up to 400.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
Yes

Please give your name
Robin stuchbury

Which of the following describe you?
I am an elected representative in Buckinghamshire

Consultation respondent 10

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
I don't know

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
I don't know

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
I don't know

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
I don't know

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
I don't know

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
I don't know

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
A long winded survey about which I know nothing. Far better that you consider more carefully and diligently the building proposals requested. We have the ridiculous scenario where a council member abstained from a vote for new Tesco in Edlesborough- over 700 objections by locals and with the abstention it got passed. Lost all faith

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I live in Buckinghamshire

Consultation respondent 11

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

That is, we agree with the principal of introducing CIL in the region, with different rates which reflect development viability issues, and the context of existing S106 charges and environmental requirements. However, further considerations may be necessary as part of the design of the charging schedule.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

We agree with the detailed and judicious consideration of the impact of additional CIL charges on development in the North and Central area. However, there may be some issues to consider as part of the supporting evidence base, namely the 'Community Infrastructure Levy Viability Assessment for the North & Central (Aylesbury Vale) Area', produced by Dixon Searle Partnership on behalf of Buckinghamshire Council.

Firstly, the current evidence base does not indicate how many private sector stakeholders, such as developers, housebuilders, land promoters / agents etc., were involved in the viability impact assessment. While this public consultation plays a role in gathering further market intelligence, to determine rates which balance revenue raising and development viability, it would be helpful to understand the quality and breadth of this engagement.

Secondly, the evidence base should also consider the impacts of the spend of S106 and CIL revenues on development viability, rather than just the immediate impact of charges. That is, provision of high-quality infrastructure and services for a development can impact the value of the residential and commercial units for that development. For example, BBF's consultation with employers indicates that transport accessibility has a significant role in determining the willingness of firms to locate their business in the area – a particular issue for the Westcott Venture Park Enterprise Zone - with resultant impact on demand for premises and rents. Therefore, use of CIL revenues to support these infrastructure outcomes, particularly transport, could support the profitability and viability of commercial developments. Furthermore, successful developments can indirectly increase local taxation revenues, such as through higher

rateable values for business rates for commercial developments, and higher council tax bands and revenue for residential developments.
Thirdly, there are no references to the Enterprise Zones, nor the key assets for innovation and economic growth, as identified in the Buckinghamshire Growth Plan. These include Silverstone Enterprise Zone, Westcott Venture Park Enterprise Zone, and the Aylesbury Woodlands Enterprise Zone. Given the strategic importance of these sites for local economic growth, it may be necessary to grant developments on these sites the same discounted CIL rates afforded to strategic residential sites, to incentivise commercial development in high opportunity clusters. However, we recommend only a small discount, such that CIL rates for commercial sites outside of Enterprise Zones and other strategic employment sites are not set disproportionately high to meet funding gap requirements, as this may impact overall delivery of commercial units across the county.
Accordingly, the evidence base could more robustly justify the introduction of CIL charges by demonstrating how expenditure supports viable and sustainable development across the county, rather than relying solely on CIL as a mechanism to address the infrastructure funding gap. It should also consider strategic employment sites, rather than strategic residential sites only.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
We agree with the logic behind setting different rates for different zones, reflecting their impact on viability.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
We agree with the general logic regarding the zones, but it is unclear why sites with Enterprise Zones, such as the Silverstone Enterprise Zone and Westcott venture park are not designated as strategic zones. Indeed, they are not mentioned in the evidence base. Strategic residential zones are included in the scope, to incentivise housing delivery to meet targets, but no discounted rates are included for non-residential developments in strategic sites, to meet economic growth targets, specifically the Buckinghamshire Growth Plan 2025 aims to achieve 2% annual productivity growth by 2030; for Buckinghamshire to have a higher proportion of high-growth firms than the national average; and for Commercial floorspace across Buckinghamshire's Enterprise Zones to be fully built out. This could be counterproductive to achieving the aims of the Buckinghamshire Growth Plan 2025, if CIL rates are not used to incentive development in locations expected to drive local productivity growth. However, significantly shifting the CIL rate burden onto commercial developments outside these strategic zones could adversely affect delivery and, in turn, productivity growth. We therefore recommend that this approach is applied in a proportionate manner.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
As per our response to question 2, additional detail of market consultation, and analysis of the impacts of CIL and S106 spend on development viability. We believe this would enhance the quality of the supporting evidence regarding the potential impacts of CIL charges on viability.

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)

Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)

To summarise the key points from our response:

We support the principle of introducing CIL, with differentiated rates reflecting viability, existing S106 obligations, and environmental requirements. However, we have made several suggestions which could improve the effectiveness of this approach.

CIL rates and viability

- Agrees the proposed rates are carefully considered.
- Identifies gaps in the evidence base:
  - Unclear extent of private sector engagement in viability testing;
  - No assessment of how CIL and S106 spend (not just charges) can enhance development value and viability.
- It should be noted that investment in infrastructure (e.g. transport) can increase demand, rents, and overall viability, particularly for commercial development.
- We support the principal of different CIL rates by zone and development type to reflect local viability.
- We support exemptions for publicly funded and not for profit uses, as charging would be counterproductive.
- We agree with a nil CIL rate for strategic sites to incentivise delivery,
- Discounted CIL rates could also be applied to strategic employment sites identified in the Buckinghamshire Growth Plan 2025 (namely the Enterprise Zones at Westcott Venture Park, Aylesbury Woodlands, and Silverstone).
- Broadly, we support the general zoning logic, subject to strategic employment sites being included alongside strategic residential zones, to ensure charging schedules do not conflict with the Buckinghamshire Growth Plan 2025.

Evidence base: we consider the evidence base to be broadly sound and well developed, but believe it would be strengthened by:

- Clearer market consultation evidence;
- Analysis of the positive impacts of CIL and S106 investment on viability.

Instalments policy: we support the proposed approach, as it will achieve consistency with other charging authorities and national guidelines.

Funding gap: we understand the funding gap, and the method used to determine the estimated gap, but we would suggest that the case for CIL would be stronger if more clearly linked to delivery, viability, and economic outcomes, not solely the gap itself.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I work in Buckinghamshire; I represent or own a business in Buckinghamshire

Consultation respondent 12

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Yes

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
As long as they provide for their own infrastructure needs through s106 or other legal agreements.

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Why are flats zero rated for CIL when they put as much demand on existing social infrastructure as new development is doing currently? Existing infrastructure can only be stretched so far before it collapses and Aylesbury and the Vale are very close to that point now, with all the new unplanned (i.e. not in VALP or AVDLP) housing which has been built in the Vale over recent years.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Cllr Carole Paternoster

Which of the following describe you?
I live in Buckinghamshire; I am an elected representative in Buckinghamshire; I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 13

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

The starting point is too low and would scoop up existing homeowners who want to extend their property and make improvements and they already contribute to the council through council tax so it looks like double taxation

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

It needs to apply to new dwellings and development only and not existing ones

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Needs a complete rethink its anothet way of tax gouging the residents

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

No

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Existing residents who already pay council tax and already contribute to the local infrastructure shoukd be exempt

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
No

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
No

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
David Wright

Which of the following describe you?
I live in Buckinghamshire; I work in Buckinghamshire; I represent or own a business in Buckinghamshire

Consultation respondent 14

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Buckingham Town Council supports the introduction of CIL in principle but not this proposal. It is concerned that due to the above the proposed charging schedule will not assist in meeting a stated aim in the PPG that CIL is "an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area." [Paragraph 001 - Reference ID: 25-001-20190901]. It considers the proposal to be premature ahead of the emerging Buckinghamshire Local Plan and a county wide review of charging schedules.

It is indicated in the DSP Report that the first stage of the exercise was to decide the approach out of four options, from do-nothing to full review of all areas. The resulting decision taken by Buckinghamshire Council has no reasoning attached in the DSP Report [pp.20/21 paragraphs 10 & 11]. If there is a review planned for the West and East & South areas alongside or immediately after the adoption of the Local Plan, then to achieve consistency of infrastructure planning base, there would also need to be a review of the North & Central. To review the charging schedule so soon after this exercise seems somewhat wasteful of resources.

The PPG places emphasis on the balance between viability [which is assessed in DSP Report] and the delivery of necessary infrastructure, the setting of a charging schedule when the supporting Infrastructure delivery plan for the emerging Local Plan which is not yet released seems premature. The DSP Report is based on VALP, the existing local plan, which is widely viewed as out of date, and in terms of Buckingham, the allocated development is delivering homes to the market, so that delivery of infrastructure has already been settled via s.106 agreements.

The Buckingham Neighbourhood Development Plan "made" in January 2026 does indicate needs and preferences for future infrastructure via developer contributions as well as the allocation of one strategic site (taking the definition for current purposes as 400+ homes) but has not been referenced in the DSP Report although it contains strategic policies which would meet the "relevant policy" test in PPG.

To illustrate a potential arising problem the example of the minimum rate for provision of affordable homes is deployed. VALP states a minimum of 25%; the BNDP which was emerging during the DSP Report's preparation and which is now made so part of the Development Plan, states minimum of 35% for BNDP Area, and the emerging Local Plan states 40% as a minimum. The DSP Report states at it is assumed that the full 25% is applied [DSP Report paragraphs 2.6.2 & 2.6.4;paragraph 3.3.3] at the same time acknowledging that s.106 agreements keep viability arguments open [paragraphs 3.3.1 & 3.3.2] Therefore the given agreed figures of £14,200 [for 10+ homes] and £1000 [1-9 homes] for working s.106 costs for each home, may not reflect the higher rate of provision of affordable homes, and the balance between CIL contributions and s106 agreement costs may be tilted potentially leading to less affordable housing being provided due to viability issues, than is assessed as required for the emerging Local Plan period. [This

finds support in paragraph 3.3.3 of the DSP Report, which notes “their consistent experience” of viability review at the planning application stage, whilst also noting again that CIL is non-negotiable.]

Buckingham Town Council is concerned that Buckinghamshire Council as the charging authority has overall for its area has 7 different zones – West (Zone A & B); Central & South; North and Central (Zones A, B, C & D) even before sub classifications such as previously developed land/greenfield (North & Central) or planning use are considered. Buckingham Town Council believes that this is unnecessary “undue complexity” especially as the charging schedules were set as such varied times [2012; 2020 & now 2026]. The charging authority is required to avoid such undue complexity [PPG Paragraph: 022 Reference ID: 25-022-20230104], which it is submitted could be achieved by reviewing (and introducing) all charging schedules as an Unitary authority with, or in light of, the forthcoming Buckinghamshire Local Plan [which is indicated in paragraph 4 page 4 of the DSP Report and again at 1.1.12 “potential revisit”]

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Little evidence is provided to show how necessary infrastructure from the relevant plan, especially the BNDP [or other neighbourhood plans in the North & Central area] will be met with this rate. The evidence seems focussed on viability for developers. There seems little evidence to show how additional resources will be generated, especially if because the charging schedule is based on an almost out of date local plan, VALP [as acknowledged by paragraph 33 p.10 of the DSP Report, which merely refers to the potential for the assessment to be used beyond VALP] viability issues are raised via s106 agreements leading to delivery of fewer affordable homes, which cannot be delivered via CIL. Nor does it consider how the infrastructure gap which cannot be delivered under the restrictions of s.106 will be adequately delivered with £0 rate on 400+ homes – the DSP Report seems lacking in assessing this policy and its implications. The DSP Report mentions in paragraph 35 [p.11] that it is “not necessary or appropriate to approve a review of all conceivable development types or variations – whether smaller or larger/of strategic scale”. It would, however, have been possible to look specifically at the existing Buckinghamshire Council policy of £0 on 400+ homes as to whether there was any “positive rate” although not “significant” that would maintain viability. This is the approach that has been taken towards non-residential development described as an example of the “pragmatism” allowed by the PPG [DSP Report paragraph 34 p.10 & paragraph 39 p.11] Again in paragraph 40 of the DSP Report, the key distinction made in terms of CIL is on 10+ homes and not 10-399

home developments, with only a later mention of strategic sites and increased infrastructure costs [DSP Report paragraph 40, p.11, 1st and 4th bullet points]. At 1.1.19 mention is made that one of the development typologies to be used would be strategic development between 550-900 homes but it is not clear how that would support the existing policy relating to 400+ homes which is then included in the Charging Schedule.
The new Local Plan is expected in 2027, in about a year's time – so what is the point of setting a charging schedule for infrastructure delivery that will be out of date so soon. There is a fear that the charging schedule rates will not deliver new infrastructure adequately once the Buckinghamshire Local Plan is adopted. Paragraph 3.3.9 of the DSP Report suggests that levels of CIL will be 'fit for purpose' for the new Local Plan, but without an Infrastructure Delivery Plan to test that against, there is also a statement to the effect that review is not precluded. There is also little indication as to how the CIL charging rates together with s106 agreements will deliver anything near the £116,952,900 unfunded infrastructure projects in Buckingham alone in Appendix 1 of the Infrastructure Funding Statement, last identified in 2017.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Zone A:
The DSP Report states "Aylesbury is the largest settlement in the area and is the focal point for housing, employment, retail and community services and facilities. Buckingham is the second largest town and there are over 80 larger, medium and smaller settlements across the area." [Paragraph 1.2.2] having noted that Winslow, Wendover and Haddenham are also main and strategic settlements.[paragraphs 1.2.2 & 1.2.3 DSP Report]
In selecting Buckingham and Aylesbury as different enough in terms of resulting sales to merit lower rates as Zone A. The values for Buckingham do not seem to be so different from the surrounding areas [as set out in Appendix 5 Table 1b and Table 6] as to justify differential treatment, especially when there are already built- in buffers for margins of viability and 17.5% developer profits. Speculative development applications are growing, which may be to avoid CIL or alternatively there is no real industry concern with viability issues in the vicinity of Buckingham. What seems to be implied is that houses do not command such high prices in these two areas compared to the surrounding area, and thus the developers make less profit so therefore requiring a lower CIL rate to ensure viability continues. It may be naïve to think that if the end product has a lower market value then would the price paid for the land initially not reflect this factor. The suggested reduced prices in Buckingham do not seem to be affecting the market unduly given the number of recent speculative development applications.
Rejection of the area bordering Milton Keynes for inclusion in Zone A is apparently on the basis that development is all of a strategic nature in size. Again, the policy proposed is that strategic sites of 400+ should be charged at £0. When the BNDP is considered in terms of strategic

allocation of sites, Policy HP3 allocates 800+ homes alongside brownfield and a smaller green field site. When the new HELAA is considered with major development proposed to the south, it is not clear that this distinction is that clearcut. This also touches on whether now is the correct time to produce a charging schedule under VALP when it is soon to be replaced.
Buckingham Town Council suggests that the relevant PPG evidential requirements for such zonal rates for "strategic sites" has not been provided [Paragraph: 026 Reference ID: 25-026-20190901]. It should have been possible to anonymise a more specific and detailed account of evidence from stakeholders working in the specific areas. It is not stated which of the many listed stakeholders did in fact respond, thus assessing actual local knowledge.
It also questions whether the "fine-grained" sampling has been undertaken fully as required by the PPG ["Charging authorities that decide to set differential rates may need to undertake more fine-grained sampling, on a higher proportion of total sites, to help them to estimate the boundaries for their differential rates" [Paragraph: 023 Reference ID: 25-023-20201116]
In recognising that there is a balance to be struck between delivery of infrastructure and viability of the development, there is concern that less infrastructure is delivered overall in these areas, which are also stated to be the main settlements identified for further growth.
Buckingham services many surrounding rural areas; developments in those areas will still rely on Buckingham to provide essential services, but CIL will be directed to the appropriate councils at a higher rate than in development within Buckingham, which will still have to deliver these resources to a wider area. There does not seem to have been any discussion or consideration as to how this could be reflected in the charging schedules.
There is an argument that CIL provides certainty for developers in calculating project costs, whereas s.106 agreements alone make for less certainty.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
More evidence is required to ensure that there is significant uplift in s106 agreements on

strategic sites to ensure that this does not breach current PPG [Paragraph: 024 Reference ID: 25-024-20240219].

A rough application of the proposed rates to known developments within Buckingham, produced a discrepancy of £7000 in strategic developments of 400+. There is a lack of evidence to show how that will be reflected in higher s106 contributions.

Benthill – 5 bedroom house in development of two – 3,200sqft [approximately 297 sq m]

- This would be charged at £50 BF or £180 GF so yielding £14,850 or £53,460
- Overall a CIL yield of £29,700
- The DSP Report takes an agreed figure of £1000 per dwelling for developments of 1-9 homes for s.106 agreements
- Total Developer contributions of CIL & s.106 - £29,700 + £2,000 = £31,700 [no affordable homes] or £15,850 per home

Off Lincoln [Moreton Road iii]– approx. 130 homes.

- This is a greenfield site. It is under 400 homes, so would be charged at the proposed rate of £80 per sq m.
- If taking the average of a 3 bedroom semi detached house [plot 113 "The Harper"- 1010 sq. ft [approx. 93.8sqm] – this would yield £7,504.
- A very approximate calculation using this figure as an average [partly based on the fact that BNDP evidence need for 3 bedroomed homes in the majority] = £975,520 in CIL yield for the development
- DSP Report figures are based on VALP requirement of 25% affordable homes and not BNDP requirement of 35%.
- The DSP Report takes an agreed figure of £14,200 per dwelling for development of 10+ homes for s.106 agreements
- Possible Total of Developer Contributions - £975,520 + £1,846,000 = £2,821,520 [including affordable homes] or £ 21,704 per home

BNDP HP3 Development – proposed 800 homes – large strategic development

- There would be no CIL charged as the development is 400+ homes.
- The working figure for s.106 agreement is £14,200 per dwelling = £11,360,000 and obviously a figure of £14,200 per dwelling. It could be assumed that the figure here would be higher as there would be greater necessary provision of s106 infrastructure but no range of contributions used to derive £14,200 working figure has been provided.

It is interesting to note that before any adjustment for s106 money in relation to scale of development, a small development will provide £15, 850 per dwelling; a small-medium development £21,704 per dwelling; and a large development exempt from CIL £14,200; £7504 less than a small to medium development and £1,650 less than a small development. This is a significant sum for adjustment in provision, and is in danger of discouraging small and small-medium development. It is also possible to view this as an incentive for large developments which greatly assist housing targets. It would be useful here to have evidence of the higher end of the s106 money for large scale development that led to the agreed figure of £14,200 per dwelling in order to assess whether the 400+ dwelling exemption is justified by the higher return

on s106 agreement money.
How are general infrastructure requirements which do not fall within s106 agreement specifications to be met without CIL on larger developments – s106 can only address the specific requirements generated by the development. The existing infrastructure gap will continue to widen if s106 agreements are the only source of contribution on larger developments because of these restrictions.

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
In selecting Buckingham and Aylesbury as different enough in terms of developer costs to merit lower rates as Zone A, there is no significant indication that similar towns such as Winslow, with the new East-West railway station, or Haddenham, with an existing direct train link to London, have such differential resulting house sales for inclusion in Zone A.
In addition, Aylesbury and Buckingham themselves are differentiated by the amount and form of urban development in recent years.
Speculative development applications are growing, which may be to avoid CIL or that there is no real industry concern with viability issues in the vicinity of Buckingham. What seems to be implied is that houses do not command such high prices in these two areas compared to the surrounding area, and thus the developers make less profit so therefore requiring a lower CIL rate to ensure viability continues. Yet there is also the statement that house prices alone are not determinative of fixing land values.
It may be naïve to think that if the end product has a lower market value then so would the price paid for the land initially not reflect this factor. The reduced prices in Buckingham do not seem to be affecting the market unduly given the number of recent speculative development applications.
Rejection of the area bordering Milton Keynes for inclusion in Zone A is apparently on the basis that development is all of a strategic nature in size. Again, the policy proposed is that strategic sites of 400+ should be charged at £0. When the BNDP is considered in terms of strategic allocation of sites, Policy HP3 allocates 800+ homes alongside brownfield sites and a smaller green field site in the rest of the Plan. When the new HELAA is considered with major development proposed to the south, it is not clear that this distinction is that clearcut. This also touches on whether now is the correct time to produce a charging schedule under VALP when it is soon to be replaced. It is not demonstrated that this policy will deliver the required infrastructure for these developments.
Secondly, this leads to inconsistency with the Buckinghamshire Council area. In the West, Zone B, Wycombe built-up area is a higher rate. As this charging schedule was made in 2012, it may be that the DSP Report more accurately reflects the current situation in large settlements, but in absence of overall review an apparently inconsistent approach arises, which would suggest that there are viability issues in the West Zone B.
As stated in response to question 7, it is submitted that there is insufficient supporting evidence

to apply this policy to North and Central, especially if no immediate review is planned in light of the new Local Plan and the new Buckingham Neighbourhood Development Plan, as there will be significant strategic sites in allocations therein. Appendix 3 as stated in 3.4.2 of the DSP Report tests scales of 550-900 homes for strategic sites, but this does not cover the 400+ policy of Buckinghamshire Council, and earlier references in the DSP Report suggest that strategic sites could begin at 100+ homes. It is submitted that this does not appear to provide robust evidence to justify the £0 rate on strategic sites of 400+ homes. As this was an existing policy, it is uncertain why this was not specifically tested in the DSP Report.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?

No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)

Lack of transparency of evidence for verification:

The main objection is that the stakeholder consultation [apparently wide-ranging and not confined to landowners/developer etc within the North & Central area] is not published on grounds of commercial sensitivity/confidentiality. The Report assures the reader that Dixon Searle Partnership [DSP] has extensive experience and can sense check the evidence. It is difficult to evaluate evidence objectively as a result especially in relation to developers' costs, and also whether there is a land price adjustment in Buckingham and Aylesbury due to the lower priced house sales or whether it is the same or similar value to surrounding areas. There is no indication that Buckinghamshire Council officers have been able to view and evaluate the basis of the recommendations in light of their local knowledge.

Weight of planning documents:

As noted, the report is based on VALP as the Local Plan. VALP is losing planning weight as the Buckinghamshire Local Plan emerges. In terms of the North and Central there are a number of neighbourhood development plans which supplement strategic policies within VALP eg Buckingham which indicates that the VALP minimum of 25% affordable homes would need to be considered at a starting point 35% due to assessed needs. Such policies mean that associated plans are "relevant plans" for the purposes of PPG. The most recent Buckingham Neighbourhood Development Plan was made in January, 2026 and so is the most-up-to-date part of the Development Plan. This and the updated strategic policies referencing VALP strategic policies eg affordable homes are not assessed but could be seen as relevant policies under PPG [Paragraph: 012 Reference ID: 25-012-20190901] There is perhaps a brief recognition of the higher rate in the BNDP Area in paragraph 2.3.2 as "..and variable affordable housing policy by geography" but this is not clearly demonstrated or referenced again.

Absence of full assessment of £0 on 400+ home developments:

It also appears that implications of the application of the 400+ home rate of £0 have not been

considered as to whether this would affect the calculations of viability. Presumably it is assumed that Buckinghamshire Council will be robust in s106 agreements to deliver significantly more, such that would be notably at the top of the figures providing the working figure of £14,200 per home in s106 agreement delivery. Appendix 3 as stated in 3.4.2 of the DSP Report tests scales of 550-900 homes for strategic sites, but this does not cover the 400+ policy of Buckinghamshire Council, and earlier references in the DSP Report suggest that strategic sites could begin at 100+ homes. It is submitted that this does not appear to provide robust evidence to justify the £0 rate on strategic sites of 400+ homes. As this was an existing policy, it is uncertain why this was not specifically tested in the DSP Report.
There is confusion within the evidence as to government policy – a Written Ministerial Statement from the previous government in 2024 is quoted – this indicates that local authorities should not charge either rates for CIL on small build projects – yet the proposed charging schedule shows a higher rate for developments of 1-9 than 10+. A worked local example shows that when the given figures for s106 agreement costs are applied – small development seem to be paying more in developer contributions than major developments. It is noted that the DSP state that changes were not made to PPG [paragraphs 8 & 9 at p.29 of the DSP Report] but it must be considered on general principles to be undesirable, evidenced by the fact that this is still referenced in the PPG itself [Paragraph: 024 Reference ID: 25-024-20240219]

Do you agree with the proposed instalments policy?
No

Do you agree with the proposed instalments policy? (Free text)
The payment should be upfront. There is no apparent instalment plan in the other charging areas within Buckinghamshire Council. There is concern that over a larger project the length of time between instalments might adversely impact on a town/parish council's ability to spend the CIL portion within the required five years, especially if the desire is to use the whole CIL portion towards one project.

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
I don't know

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Buckingham Town Councillors agree with the overarching principles, they do not necessarily support the way in which they are being applied. There are concerns regarding a significant funding gap in Buckingham due to its placement in Zone A and the policy of £0 rate CIL on developments of 400+ homes.

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of

the former Aylesbury Vale district) (Free text)
Clarification required as to whether Zone A around Buckingham is the parish boundary or the BNDP Area – there is a difference. If development occurs within the Gawcott-cum-Lenborough Parish land within the BNDP Area, the Zone B rates applicable will potentially be significantly different.
Prematurity, that the charging schedule is being brought forward ahead of both the new Local Plan and any review of the existing charging schedules within the Buckinghamshire Council area. This leads to undue complexity through not only multiple charging schedules but the variations contained internally therein such as previously developed land/greenfield and development size even below 400. This does not present an unified and consistent approach and goes beyond basic differential charging.
Delivery of required infrastructure in the future as the Report is based on VALP and does not mention other parts of the Development Plan eg relevant policies in the BNDP.
Evidence of viability: there are a number of perceived flaws in the evidence to support the creation of Zone A, especially in relation to assumption of same developer costs but lower house prices based solely on average house prices as opposed to more relevant new build sale prices. Overall a disquiet is felt over the lack of transparency of the data in the evidence base which has not even been shared with Buckinghamshire Council officers on a confidential basis.
Impact of the existing £0 rate on strategic developments of 400+. This appears to an afterthought in the Report and proposed Charging Schedule and its impact has not been fully assessed within this report both in terms of viability and of delivery of infrastructure. [paragraphs 6-9 of the DSP Report only discuss CIL on 10+ houses, rather than 10-399 as will be the case when current policy is applied; Appendix 5 models 550-900 home strategic sites but not 400+ despite this being a known BC policy]

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
Yes

Please give your name
Sheena McMurtrie, Town Plan Officer

Which of the following describe you?
I live in Buckinghamshire; I work in Buckinghamshire; I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 15

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
I don't know

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
In some areas it seems to be protectionism and nimbyism and to discourage development. If you don't want development in a certain area don't use CIL rates as a buffer.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
I don't know

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
I think it depends whether you are talking about a public or a private facility. Public facilities should be exempt, because otherwise you are just robbing the public purse from Peter to pay Paul, but private facilities, ie hospitals, clinics, should not.

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
If you are going to apply a levy then it should also apply to strategic sites - or are you thinking that you won't get investment if you do? Strategic sites will be large-scale developments with potential to create a lot of income for developers - why should they be treated any differently?

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I live in Buckinghamshire; I am an elected representative in Buckinghamshire; I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 16

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

The introduction of a CIL charging schedule is now commonplace across many local authorities and
indeed across much of Buckinghamshire it is already in place.
The Planning Practice Guidance is clear that "Charging authorities should consider relevant national planning policy when drafting their charging schedules. This includes the National Planning Policy Framework in England. Charging schedules should be consistent with, and support
the implementation of, up-to-date relevant plans" (ref ID: 25-011-20190901).
The supporting document prepared by Dixon Searle Partnership is based on the adopted local plan, which was adopted in September 2021. The Council are currently working on a new Local Plan covering the whole of Buckinghamshire; however, this has not yet reached Regulation 19 stage.
As such, the draft charging schedule is based on a Local Plan which is not up to date, and which will soon be replaced. At the current time, it is unknown whether there will be any policies within
the emerging Local Plan which may increase costs for developers and therefore impact on viability
and the level of CIL that could be supported.
It is therefore seen as premature to introduce CIL prior to the adoption of the new Local Plan, especially as it is not even based on the emerging Plan. It would be more appropriate for a comprehensive updated CIL charging schedule across the whole of Buckinghamshire to be prepared following the adoption of the new Local Plan.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

It is not possible to give a detailed response to this, as the assessment has been based on the current Local Plan and not the policies in the emerging Local Plan. As is acknowledged within

the Report, since it was carried out the draft NPPF has been published, and there has been confirmation on the implementation of the Future Home Standards. All of these have the potential to impact on viability.

As has been set out above, there are concerns that the CIL charging schedule is being based on the current Local Plan, which is due to be replaced. In line with the PPG "Charging schedules should be consistent with, and support the implementation of, up-to-date relevant plans" (ref ID: 25-011-20190901). As such, it would be more appropriate to introduce CIL once the new Local Plan is in place.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
In line with the PPG Guidance, "Charging authorities may also set differential rates by scale. Rates can be set by reference to either floor area or the number of units or dwellings in a development" (ref ID: 25-024-20240219).
As such, it is not unreasonable to charge different rates. However, and as has been set out previously the implementation of CIL is considered premature as it is based on the current local plan. In order to be robust, a revised assessment of potential CIL levels should be undertaken once the requirements and potential additional costs to developers from emerging policies in the new Local Plan are known.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
I don't know

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
No specific comments to make on the proposed exemptions.

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
I don't know

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
No specific comments to make on the charging rate for strategic sites.

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
No specific comments to make on the proposed boundaries.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
The draft CIL charging schedule has been prepared against the current Local Plan. Within the Document prepared by Dixon Searle Partnership at 3.12.6 it states:
"The review and potential revisiting of any CIL charging schedule is likely to be appropriate after a few years, based on further updated circumstances and information. In this case the Council's intention is to implement CIL based on the current (adopted) Local Plan for the relevant area (VALP) as soon as practically possible. This is also with a view to this first N&CB Charging Schedule to be set up in a way that ideally does not need a complete overhaul in order to be workable with the new Buckinghamshire Local Plan strategy and policies. That may need to be considered further, however, once it becomes possible to fully assess the need or otherwise for a
CIL charging schedule review as the LP development process reaches an appropriate stage."
Given it is the intention to submit the Buckinghamshire Local Plan for examination by the end of 2026, it would appear sensible to delay bringing in CIL to the north and central area until a robust assessment can be made on the implications of the new Local Plan on the viability of CIL rates. This in turn would allow for a comprehensive review of CIL to be made across Buckinghamshire.

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
The Planning Practice Guidance is clear that the ability to pay in installments assists with the viability of developments. The guidance is clear that "Few if any developments generate value until they are complete either in whole or in phases." (ref ID: 25-128-20190901). Therefore, the ability to pay in installments is welcomed. The opportunity to pay in installments is particularly welcome, given the current cost of living crisis and economic uncertainty within the Middle East, and also the likely additional costs associated within the rise in energy efficiency standards. This ability for Developers to pay in installments will help with cash flow and ensure that developments can be delivered in a timely manner.

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
No

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
It is clear that there is a significant funding gap, and CIL has the potential to fill some of it. However, as has been stated previously CIL is being introduced prematurely.

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
No further comments to those set out above.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
Yes

Please give your name
Emma Wilsdon

Which of the following describe you?
I am a developer or planner in Buckinghamshire

Consultation respondent 17

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Better parking permits

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
I don't know

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
n/a

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
All services will improve

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
-xxxx- housing with lots of -xxx- residents

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
-xxxx- CIL rates

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
n/a

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Better quality

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
n/a

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?

I live in Buckinghamshire; I work in Buckinghamshire; I work for Buckinghamshire Council; Buckinghamshire Archives

Consultation respondent 18

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?

I live in Buckinghamshire

Consultation respondent 19

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
detailed response provided separately

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
detailed response provided separately

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
detailed response provided separately

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
detailed response provided separately

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
detailed response provided separately

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
detailed response provided separately

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
I don't know

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
detailed response provided separately

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?

I am a developer or planner in Buckinghamshire; Other (please give details below):; Land Promoter

Consultation respondent 20

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

The rates are less than those implemented and therefore considered to " strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?" in the south of the County.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
If S106 is enforced.

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Whilst supporting the principal of the introduction of CIL County wide now, there is concern that the new lower CIL rates will be "harmonised" across the County resulting in lower rates in the south of the County.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I work in Buckinghamshire; I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 21

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Nil band .. See below

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
This amount of homes or the most pressure on local communities. S106 is wholly inadequate to deal with pressure on services and moreover only deals with infrastructure. Bucks for example has a network of community libraries. They cannot access s106 funding but CIL parents to parish councils can support them to deal with increased membership and numbers from increased housing.

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
The Flat £0/sq. m Flat Rate: Setting a flat £0/sq. m CIL on all flat/apartment developments across all zones protects apartment viability, but it means the council leaves significant developer contributions on the table in higher-value pockets where small-scale or luxury apartments might actually be viable.

On a massive greenfield site, upfront infrastructure (spine roads, utilities, primary schools) is rarely a clean linear cost per unit. Capping sensitivity testing at £40k/unit without modeling the severe cash-flow lag of heavy front-ended capital expenditure (CapEx) creates a distorted picture of early-stage project viability.

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
No

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free

text)
No. The developers just want you to give in during this part of the property cycle. If the economy eases these things behind now affordable. Yields ease and money is there to be made. Hold firm

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Because the draft schedule aggressively zero-rates flat developments and large strategic sites (relying strictly on Section 106 agreements instead), communities are actively deprived of that 25% direct cash injection. Section 106 money stays entirely with the overarching unitary council (Buckinghamshire Council) to distribute. A better framework would require strategic sites to pay a nominal baseline CIL rate (even if just £20–£30/sq. m) specifically to ensure the local parish or town gets its statutory 15–25% cut for immediate neighbourhood projects.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Thomas Hobbs

Which of the following describe you?
I live in Buckinghamshire; I represent a community or voluntary group in Buckinghamshire

Consultation respondent 22

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
Yes

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
No

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
It should be for all housing developments.
There are a lack of doctors, secoundary school places as it is if there are more houses infrastructure needs a serious review

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
They should pay something and it is essential that there are school places available either by building new schools or expanding and building due sites especially for secoundary schools!!

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
I don't know

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Across bucks there needs to be more drs and schools or increased school places. Living I. One of the rural communities in bucks but close to 2 county boundaries getting secoundary school

places are being increasingly difficult and children being offered places at schools miles and time away that is unrealistic.
Wing school cottesloe for example needs to have a split site maybe or new buildings to allow for higher numbers ior even a new secoundary school built in the Cheddington area!

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I live in Buckinghamshire

Consultation respondent 23

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Whilst we can appreciate that a more consistent approach to CIL charges across Buckinghamshire would be sensible, The CLA strongly opposes CIL being charged on any agricultural development - even if at a 'reduced' rate of £25/m2. Adding CIL charges on to new agricultural developments does not support a prosperous rural economy - it stunts it. We know that there is a 16% gap in the value of the rural economy vs more urban areas and if this gap was closed it would add something like £40 billion to the UK's economy. Now is not the time (especially with the recent Inheritance Tax changes) to further disincentivise rural landowners from investing in their property and businesses. CIL is intended to fund infrastructure necessitated by development. However, most agricultural buildings generate negligible additional population , do not materially increase demand on schools, healthcare, or transport networks and tend not to intensify use. As such, there is limited justification for requiring contributions toward infrastructure typically associated with residential or commercial growth. Unlike commercial or residential developers, farms cannot absorb or offset costs through sales or letting values. The proposed charge would therefore have a disproportionate impact on rural businesses, contrary to the principle that CIL should not threaten the deliverability of development across the area.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

The national planning policy framework supports a prosperous rural economy and sustainable growth and diversification of agricultural businesses. Adding a CIL charge to proposed agricultural developments would only make it harder for farmers to financially justify further investment in their business (already made worse by the removal of APR and BPR for inheritance tax which in itself is enough to make farmer's not want to increase the value of their farms. That said, without investment in new buildings etc. growth in this struggling sector simply is not possible. Therefore, agricultural buildings/ development should be exempted from any new CIL charges being brought in - as many other councils have done. Whilst £25psqm may not

amount to a lot for small scale developments, farm
buildings by their very nature require large floor areas e.g. a 1500sqm grain store or cattle shed would attract a CIL charge of £37,500 under the current proposals. This is a sum that a lot of farmer's would find hard to a) find and b) justify in this current economic climate with wars causing hikes in the price of fuel and fertiliser, SFI yet to open again for applications and the ever present threat of yet another very hot summer causing drought conditions and therefore, failed crops.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Agricultural development which should be exempted from any CIL charges to ensure that this essential rural development remains viable and deliverable.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
I don't know

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as

proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
The DSP report identifies that charging CIL on developments other than residential and commercial can present viability challenges and recommended that a £nil charge be adopted. The principles of assessment of community halls and exemption of publicly funded or not-for-profit organisation should be applied to agricultural buildings wherein many of the determining factors are aligned with the assessment within the DSP report particularly at 3.10.9 and 3.11.8 respectively.
The DSP report identifies that there is insufficient viability scope to support positive CIL charging for “other development” so recommends that nil rating (£0 per sq. m.) or at most a nominal charging rate for minor developments. The Council however proposes to charge a "nominal charging rate" of £25psqm for "other development" which may not amount to a lot for small scale developments, however farm buildings, which would fall within this category, by their very nature require large floor areas e.g. a 1500sqm grainstore or cattle shed would attract a CIL charge of £37,500 under the current proposals.

Do you agree with the proposed instalments policy?
I don't know

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
I don't know

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
The CLA represents more than 24,000 members who collectively manage and/or own about 11 million acres of rural land in England and Wales. CLA members can be individuals, businesses, charities, farmers and estate managers who together represent around 250 different types of rural businesses. They generate jobs, provide land and buildings for investment, housing for local people as well as producing food and a whole range of land-based environmental goods and services. They also manage and/or own as much as one third of all heritage in England and

Wales, making the CLA by far the largest heritage-owner group.

CLA members include every size and type of holding, from estate owners to the smallest land holding of less than a hectare. The membership encompasses all traditional agricultural and forestry from the most sophisticated dairy and arable enterprises, pigs and poultry, through to highly productive intensive horticulture and vegetable production and more extensive livestock systems. The majority of our landowning membership is made up of family farm owner-occupiers many of whom have diversified into other business activities in response to the pressure on farm incomes.

The CLA also represents the interests of owners of other types of rural businesses including, for example: forestry enterprises, mineral and aggregate operators and owners, hotels, golf courses, tourist enterprises, equestrian establishments, a myriad of small rural enterprises and also institutional land owners such as water companies, pension funds, and development companies. Our members have businesses in the countryside and live in its rural communities and villages. All of this frequently brings CLA members into contact with local authorities and in particular - Planning departments.

The CLA is unique in that it lobbies for the development of the rural economy and is concerned that no unnecessary restriction is placed on that process. Many of our rural businessmen and farmers experience growing regulation as more red tape emerges from all levels of government. Furthermore, rural businesses and communities suffer from remoteness, and exclusion; indeed many feel that their needs for jobs, housing and services are not catered for by an urban-biased planning system. But they are also at risk of being left behind economically because of flawed CIL viability assessments that will affect potentially beneficial rural economic development.

The CLA represents the wide diversity of the rural community and is the only single organisation able to do so in quite so comprehensive a manner. We are glad of the opportunity to be an active partner in any consultation exercises or decision making processes in which rural business and the communities form part.

A local planning authority must have regard to development viability when setting their CIL charges. Any authority wanting to charge a levy for agricultural, forestry or other rural economic development proposals will need to justify this in their consultation(s) and we cannot see that the DSP report has done this.

The viability of a development is crucial to the delivery of economic growth and jobs whether in rural or urban areas. CIL is intended to be a pro-growth tool. But we are seeing charging schedules that are imposing urban-focussed CIL charges on new development in rural areas. Introducing CIL charges may have the effect of making the already difficult development climate even harder with the obvious knock-on effects for the Government's growth and housing agendas.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
Other (please give details below):; I am from the Country Land and Business Association - A member organisation representing rural land and business owners.

Consultation respondent 24

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

The viability work underpinning the proposed CIL charge is flawed in the assumptions it makes (see later comments)

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

As above, the viability work does not reflect the full costs and risk of undertaking development meaning that the CIL would pose a serious risk to the financial viability of development projects in the area.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

As above

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Yes

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Agree with the nil rate - strategic sites have specific viability and risk challenges and introducing an additional mandatory charge for these projects would seriously undermine their deliverability.

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
The assumption of £14,200/dwelling for the residual S106 after CIL is introduced, while better than some equivalent viability studies, is still not reflective of reality in the area. We have been involved in a recent scheme of under 400 dwellings in the former Wycombe area of Bucks and the S106 financial contributions amount to c£22k per dwelling, alongside the CIL charge. This is in addition to a large package of on-site works including mobility hubs and sports facilities and a substantial off-site highways improvement commitment.

The site typologies are too heavily weighted towards the very small or very large, with many typologies between 5-100 dwellings but none between 100 and 550.

Professional fees have been steadily increasing over the years due to the increase in the number and complexity of reports required to support a planning application. 8-10% is no longer sufficient, with fees more likely to be in the range 10-12%.

The risk associated with residential development projects is increasing, with costs mounting, affordable housing providers being less inclined to take on new properties and an uncertain future in respect of sales values. The assumptions of 17.5% GDV for the profit on the private homes and 6% for affordable is not sufficient as an average to reflect the substantial risks that housebuilders take when they set out on a project.

The assumptions for the revenues from affordable housing as a % of the open market revenues (at 55% for affordable rent and 65% for intermediate) are also out of date. Over the last few years, due to the well documented issues, the amount that affordable housing providers pay for new units as a percentage of their open market price has been substantially reduced so that the blended (mixed tenure) rate is now around 55-60%. With this district having a policy for a high proportion of rented homes (80%) the blended rate will sit towards the bottom end of this range.

The assumption that BNG costs equate to 2.4% of build costs is likely to significantly underestimate the costs experienced on many sites in achieving a 10% net gain. This might be the case for sites currently in arable use but a large number of the sites that will be developed are previously in pastoral/grazing use which have a much higher baseline value under the BNG rules and will take significantly higher costs to achieve the 10% net gain.

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I am a developer or planner in Buckinghamshire

Consultation respondent 25

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

I support the principle of the Community Infrastructure Levy as a mechanism to ensure that new development contributes fairly towards the infrastructure required to support population growth and increased demand on public services.

However, I believe the proposed charging structure should be revised to ensure greater consistency, fairness and public confidence in the system.

Firstly, the levy should apply consistently to every new residential dwelling delivered within Buckinghamshire, regardless of the size of the development site. All new homes generate additional demand on local infrastructure, including roads, schools, healthcare services, drainage, utilities and public transport. Restricting contributions primarily to large-scale developments risks creating inequity between developments and may encourage artificial site fragmentation in order to reduce liabilities.

A consistent per-dwelling or per-square-metre developed approach across all residential development would create a fairer and more transparent system. Small developments may reasonably attract proportionately lower overall contributions due to their scale, but the principle of contribution should remain universal.

Secondly, I strongly support a delivery model where CIL payments are secured and collected before the commencement of development (this applies in a lot of countries in Europe) rather than later in the construction process. Infrastructure delivery should occur in parallel with housing growth, not after occupation has already taken place.

In many areas, communities experience significant delays between residential expansion and the provision of supporting infrastructure. This places pressure on existing residents and reduces public confidence in the planning system. Requiring infrastructure funding to be available before construction begins would allow local authorities and infrastructure providers to plan and deliver upgrades in a more timely and coordinated manner. I therefore encourage Buckinghamshire Council to:

apply CIL consistently across all new residential developments;

avoid exemptions or thresholds that undermine fairness;

ensure that infrastructure funding is secured at the earliest possible stage; and

prioritise infrastructure delivery alongside, rather than after, housing construction.

Overall, I support the objective of the CIL framework, but believe stronger consistency and earlier infrastructure funding would significantly improve its effectiveness and public legitimacy.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the

viability of developments?
No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
I acknowledge that the draft Charging Schedule has been informed by viability evidence and that the Council must ensure that CIL rates do not discourage the delivery of new housing and economic development.
However, I do not believe the proposed structure fully achieves an appropriate balance between development viability and the need for fair, consistent infrastructure contributions across all forms of residential development.
While viability considerations are important, all new residential development creates additional pressure on infrastructure and public services. For the moment the Councils avoid small sites, because of the CIL issue. The proposed approach appears to place a disproportionate emphasis on maintaining viability for larger development sites, while limiting the consistency of infrastructure contributions across the wider housing market.
In particular, the use of thresholds and differential treatment for larger strategic sites risks undermining transparency and public confidence in the system. Large-scale developments generate significant cumulative impacts on transport networks, healthcare provision, education capacity, drainage systems and utilities, and therefore should continue to make meaningful and proportionate infrastructure contributions.
I would support a more consistent charging approach where all new dwellings contribute toward infrastructure delivery on an equitable basis, even if rates are adjusted proportionately to reflect site-specific viability considerations where robustly justified.
I also consider that infrastructure funding should be secured earlier in the development process to enable infrastructure provision to progress in parallel with housing delivery. Delays between residential occupation and infrastructure upgrades can place unacceptable strain on existing communities and services.
Overall, while the evidence base may support the broad viability assumptions used by the Council, I believe the Charging Schedule would benefit from:
greater consistency in residential CIL application;
reduced reliance on thresholds and exemptions;
stronger alignment between housing growth and infrastructure timing; and
a clearer emphasis on fairness and public confidence within the charging framework.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

I recognise that differential CIL rates can be justified where there is clear evidence of variation in land values, development viability and market conditions across different parts of Buckinghamshire and across different forms of development.
However, I believe the proposed approach should place greater emphasis on consistency, transparency and fairness, particularly in relation to residential development.
While some variation between geographic zones may be reasonable where supported by robust viability evidence, the overall structure should avoid creating significant disparities in infrastructure contributions between developments that generate similar impacts on local services and infrastructure.
In particular, I am concerned that extensive differentiation between development types, site scales or charging zones may make the system unnecessarily complex and reduce public confidence in the fairness of the CIL framework. All new residential development contributes to increased demand on roads, schools, healthcare, utilities, drainage and public services, regardless of location.
For this reason, I would support a more consistent residential charging approach across Buckinghamshire, with limited and clearly justified variations only where there is compelling evidence that viability conditions differ substantially.
I also believe that large-scale developments should continue to make proportionate infrastructure contributions and should not benefit from arrangements that significantly reduce their overall contribution relative to smaller developments.
Overall, I accept that some differential charging may be appropriate, but I would encourage the Council to:
* minimise unnecessary complexity between zones and development categories;
* maintain a clear and equitable contribution framework for residential development;
* ensure that viability evidence is regularly reviewed and transparently published; and
* prioritise fairness and infrastructure delivery alongside development viability.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
I generally agree with the proposed exemption from CIL for developments delivered by predominantly publicly funded or genuinely not-for-profit organisations providing essential community infrastructure and public services.
Facilities such as healthcare, education, emergency services, social care, community facilities, sports and leisure infrastructure are fundamental to sustainable communities and should be

encouraged rather than financially constrained through additional levy requirements. In many cases, these developments directly mitigate the impacts created by population growth and residential expansion.
However, I believe the exemption framework should be carefully defined and transparently administered to ensure that exemptions are only applied where developments deliver clear and demonstrable public benefit.
In particular, the Council should ensure that:
* exemptions are limited to genuinely publicly funded or not-for-profit organisations;
* commercial or profit-generating developments are not able to benefit indirectly from the exemption structure;
* mixed-use developments are assessed carefully to avoid unintended avoidance of CIL liabilities; and
* there is clear public reporting on exempted developments and the justification for exemption decisions.
I also consider it important that exemptions for community and public service infrastructure are accompanied by a stronger requirement for residential developments to contribute consistently toward infrastructure delivery. Public infrastructure providers should not be expected to compensate for infrastructure pressures created by private residential growth without adequate funding support.
Overall, I support the principle of exemptions for essential public and community infrastructure, provided that the criteria remain clear, proportionate and transparently enforced.

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
I do not agree with the proposal to apply a nil rate of CIL to strategic sites.
I recognise that large strategic developments are often required to deliver significant on-site infrastructure directly through Section 106 obligations, including roads, schools, utilities, public open space and community facilities. I also acknowledge that viability considerations are important in ensuring the deliverability of major housing allocations.
However, strategic sites also generate some of the most significant cumulative impacts on wider infrastructure networks across Buckinghamshire. Large-scale residential growth places substantial pressure on transport systems, healthcare services, education capacity, drainage infrastructure and other public services beyond the immediate site boundary.
For this reason, I do not consider a nil-rate approach to be an equitable solution. Exempting large strategic developments entirely from CIL risks creating a perception that smaller developments contribute proportionately more toward infrastructure funding, despite having a lower overall impact.
A more appropriate approach may be:

* clearer integration between CIL and Section 106 contributions to avoid duplication while maintaining fairness;
* stronger transparency regarding the infrastructure obligations secured through Section 106 agreements; and
* safeguards to ensure that strategic developments continue to make meaningful contributions toward both on-site and wider strategic infrastructure needs.
I also believe that infrastructure delivery associated with strategic sites should be secured and implemented at an early stage of development so that housing growth and infrastructure provision progress in parallel.
Overall, while I understand the rationale for recognising the substantial infrastructure obligations already placed on strategic sites, I do not support a blanket nil-rate approach and would encourage the Council to adopt a more proportionate contribution framework.

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
I acknowledge that the proposed charging zone boundaries have been informed by evidence relating to land values, market conditions and development viability across Buckinghamshire. However, I believe the Council should ensure that the boundaries remain as simple, transparent and evidence-based as possible in order to maintain public confidence and reduce unnecessary complexity within the CIL system.
While some variation between geographic areas may be justified, significant differences between neighbouring zones can create perceptions of inconsistency and may unintentionally influence development patterns or encourage attempts to maximise viability advantages through site positioning and land promotion strategies.
I would therefore encourage the Council to:
* ensure that charging zone boundaries are supported by robust and regularly updated viability evidence;
* avoid excessive fragmentation into multiple charging areas where differences are marginal;
* maintain a clear and easily understandable structure for applicants, communities and infrastructure providers; and
* regularly review the effectiveness of the charging zones to ensure they continue to reflect actual market conditions.
In particular, I believe that all residential development across Buckinghamshire should continue to contribute fairly toward infrastructure provision, regardless of location, with zoning differences kept proportionate and clearly justified.
Overall, I accept that different charging zones may be appropriate where supported by strong evidence, but I would encourage the Council to prioritise simplicity, fairness and consistency when finalising the charging zone boundaries.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as

proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
I acknowledge that the viability evidence prepared by Dixon Searle Partnership provides a structured and professionally prepared assessment of development economics across Buckinghamshire and is a necessary component of establishing a Community Infrastructure Levy Charging Schedule.
However, while I recognise the importance of viability testing in ensuring that development remains deliverable, I do not consider that viability evidence alone should determine the structure or level of CIL rates without stronger consideration of fairness, consistency and long-term infrastructure funding needs.
Viability assessments are inherently sensitive to assumptions regarding land values, build costs, sales values, and developer return. As a result, outcomes can vary significantly depending on the input parameters and modelling scenarios used. This makes it important that such evidence is not interpreted in isolation, but is balanced against broader planning objectives, including infrastructure provision, equity between developments, and public confidence in the planning system.
I would therefore support the use of the viability evidence as part of the overall evidence base, but would encourage the Council to:
* ensure full transparency of assumptions, sensitivity testing and modelling scenarios;
* regularly update viability evidence to reflect changing market conditions;
* avoid over-reliance on viability outcomes where they lead to significant exemptions or reduced contributions for certain development types; and
* ensure that the final Charging Schedule maintains a clear and equitable approach to infrastructure contributions across all residential development.
Overall, I consider the viability evidence to be a suitable input to the decision-making process, but not sufficient on its own to justify the proposed structure of rates without stronger weighting given to fairness and infrastructure delivery objectives.

Do you agree with the proposed instalments policy?
No

Do you agree with the proposed instalments policy? (Free text)
I consider that infrastructure funding should be secured at an early stage of development and that instalment arrangements should not create a situation where development is completed or occupied significantly ahead of infrastructure provision being funded and delivered.
To improve the effectiveness and fairness of the policy, I would encourage the Council to consider:
ensuring that instalment schedules are clearly linked to development milestones and phased appropriately;

limiting extended deferral of payments, particularly for smaller or higher-impact developments; maintaining safeguards to prevent delays in infrastructure funding that could affect local service capacity;
ensuring transparency so that communities understand when CIL receipts are expected and how they align with infrastructure delivery timelines.
Overall, I understand the use of instalments in principle as a pragmatic tool to support development viability, but only where the policy is structured to ensure that infrastructure delivery remains closely aligned with the timing of housing occupation and growth.

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
I don't know

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
I acknowledge that the Infrastructure Funding Gap Statement is an important component of the evidence base and that it demonstrates the pressures placed on local infrastructure arising from planned growth in Buckinghamshire.

In principle, I agree that there is likely to be a significant funding gap between the infrastructure required to support planned development and the funding currently available through existing mechanisms such as Section 106, government funding and other capital sources. In that context, the introduction of a Community Infrastructure Levy is a reasonable and appropriate policy response to help address part of this gap.

However, I consider that the existence of a funding gap alone should not be used to justify any specific level or structure of CIL rates without careful consideration of viability, fairness and deliverability across different types and scales of development.

It is also important to recognise that CIL is only one funding mechanism within a broader infrastructure funding framework, and it will not in itself fully close the gap identified in the evidence. As such, it should be complemented by:

* clear prioritisation of infrastructure projects;
* transparent allocation of CIL receipts;
* effective coordination with Section 106 contributions for site-specific mitigation; and
* ongoing engagement with infrastructure providers to ensure realistic delivery programming.

Overall, I agree that the Infrastructure Funding Gap Statement supports the principle of introducing CIL as part of a wider funding strategy, but I would emphasise that the effectiveness

of CIL will depend on how consistently and transparently it is applied, and how well it is integrated with other infrastructure funding mechanisms.

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)

I welcome the principle of introducing a Community Infrastructure Levy across the North and Central planning areas of Buckinghamshire Council, as this will help to provide a more consistent and transparent mechanism for securing contributions towards infrastructure required to support planned growth.

However, I would strongly encourage the Council to ensure that the final CIL framework is designed and applied in a way that is genuinely consistent across all areas of Buckinghamshire, rather than being fragmented by historical administrative boundaries or differing local approaches. All new residential development across the county generates infrastructure demand, and therefore a broadly uniform approach to infrastructure contributions would be more equitable and easier to understand for applicants and local communities.

In my view, the system would benefit from greater consistency in the following areas:

* a universal principle that all new residential dwellings make a proportionate contribution toward infrastructure costs;
* avoidance of thresholds or exemptions that create unequal treatment between similar developments;
* alignment of charging approaches across different planning areas to ensure fairness across Buckinghamshire as a whole; and
* clear and transparent reporting on how CIL receipts are spent across all communities.

I also reiterate the importance of ensuring that CIL contributions are secured at an early stage in the development process so that infrastructure provision can be planned and delivered in parallel with housing growth, rather than lagging behind occupation.

Finally, I consider it important that the introduction of CIL in the North and Central areas should be seen as a step towards a coherent county-wide infrastructure funding strategy, rather than a continuation of differing approaches inherited from previous administrative structures.

Overall, I support the introduction of CIL in these areas, but strongly encourage Buckinghamshire Council to move towards a simpler, more consistent and more equitable county-wide framework in the longer term.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?

No

Please give your name

Not answered

Which of the following describe you?

I represent a community or voluntary group in Buckinghamshire; We own some parcels of land in Buckinghamshire.

Consultation respondent 26

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Yes

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

We agree that differentiating between disparate areas in Buckinghamshire makes sense and we agree with the proposed schedule.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Yes

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

On face value, viability will not be negatively affected. The zones make sense and seem reasonable. The actual amounts may change, and that is understandable at this stage of the process.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Yes

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

The zones make sense and seem reasonable. The actual amounts may change, and that is understandable at this stage of the process.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

We agree in principle however we need more definition of Not-For-Profit. i.e. does that automatically exclude all privately owned sports and leisure facilities?

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Given that S106 consultations currently exclude participation by Town and Parish councils, and large-scale development have the most impact on towns and villages. It feels wrong that they do not receive funds to cope with local impact of those developments. This also applies to the southern CIL/S106 scheme as well.

Do you agree with the proposed boundaries of the different CIL charging zones?
I don't know

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
The parishes most directly affected are best placed to comment on this.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Yes

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Historically, parish and town councils have not received sufficient support from development payments to provide needed additional infrastructure. Additional funding mechanisms are required to address this shortfall. We think the zoned approach goes part way to allow for flexibility within the system to support differing level of development concentration and geographical variances in cost.

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Staggering the payment schedule is a common-sense approach to easing the fiscal impact while making sure that the due amount is paid, whilst making sure that Parishes still receive funding to address issues created by the development.

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)

The funding gap has widened over the years due to austerity and the reduction in national infrastructure spending. Budgets in Buckinghamshire have also reduced following the national trends. There is therefore a persistent and substantial funding gap which needs addressing. CIL goes someway to address this shortfall, especially for Towns and Parishes, with the introduction of CIL sharing.

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)

1. We welcome the introduction of this new model. It is long overdue that the North and Central areas receive CIL – an important revenue stream for Town and Parish Councils affected by development.
2. The proposed model's differentiated approach for areas with differing economic viability is sensible, provided there is sufficient data to set charges for each zone.
3. We do not agree with the general exemption of CIL payments from developments classed as strategic sites. This exemption denies Parish and Town Councils input or participation in infrastructure negotiations around large developments.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?

No

Please give your name

Not answered

Which of the following describe you?

I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 27

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Buckingham should not have a lower CIL charge than the rest of North/Central Bucks.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

The evidence does not support a lower CIL charge for Buckingham. The consultant has used a lower property sales value for Buckingham but not a lower land value, and it is the difference between the two that drives the viability of a CIL charge.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

I agree with the rates except the lower CIL charge for Buckingham. As noted under Q2, the rate for Buckingham should be the same as the rest of North/Central Bucks.

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Yes

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
No

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Given the scale of house building planned in the coming years, nearly all of the developments are likely to be 400+ homes. While I understand that these developments will also be paying significant Section 106 payments, there could be a case for a modest CIL charge in addition. This would provide parish/town councils with a bigger stake in how developer money is spent, particularly those with Neighbourhood Development Plans.

Do you agree with the proposed boundaries of the different CIL charging zones?
No

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
The evidence does not support Buckingham having a separate charging zone from the rest of North/Central Bucks.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
I disagree with the consultant's approach whereby differential property sales prices are used for Buckingham (and Aylesbury) but not differential land prices. In reality there is probably little difference in the margin available to developers in Buckingham vs other parts of Central/North Bucks because land prices will be lower if sales prices are lower.

I found the consultant's report to be wordy and unclear in places. The heat map on page 85 of the consultant's report is misleading because it shows average sales prices not new build sales prices; you can see that the newer developments of Lace Hill and St Rumbolds attract a much higher sales price than the older parts like Page Hill and Linden Village.

For strategic sites, I would also question the assumptions about developer profits and buffers - these may have been appropriate in the past but we're now entering a mass building programme driven by the Government and most industries don't get the same percentage profits when volumes are scaled.

Do you agree with the proposed instalments policy?
Yes

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Yes

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Please disregard my previous consultation response and use this one instead, as I realised I had made an error previously. They have both been submitted by Heather Haydock, heather.haydock@btinternet.com.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
Yes

Please give your name
Heather Haydock

Which of the following describe you?
I live in Buckinghamshire; I am an elected representative in Buckinghamshire

Consultation respondent 28

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

No

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Paragraph 1.1.15 of the Viability Appraisal Report1 (VA) explains the Community Infrastructure Levy (CIL) covering North and Central Buckinghamshire (the old Aylesbury Vale district) is being prepared in the context of the adopted Vale of Aylesbury Local Plan (VALP) 2013-2033 and therefore considers the current, adopted policy requirements such as affordable housing provision, housing mix etc rather than any policies emerging through a new Buckinghamshire-wide local plan. Whilst this may be appropriate in principle, it ignores the fact that new Local Plan for Buckinghamshire is likely to be adopted within the next 18 months or so (according to the latest Local Development Scheme). Similarly, the draft CIL will need to be tested through a formal examination in line with the relevant regulations. However, the consultation does not clarify when the new CIL is expected to be adopted. Under these circumstances, it does not appear a sensible use of time or resources to prepare a CIL that, in a relatively short period of time, will become out of date once the new local plan is adopted. We recommend the council waits until the new local plan is adopted and then brings forward a CIL that will be up to date for the next five years, or bring it forward in conjunction with the new local plan so both the CIL and the local plan can be considered alongside each other.

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

No

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Table 1 of the Infrastructure Funding Statement December 2025 (IFS) identifies a funding gap of £787.68m up to 2033, when all potential sources (inc. s106 contributions and projected CIL receipts) are taken into account. Paragraph 6.11 states the Council is continuing to explore potential opportunities to deliver necessary infrastructure, including government grant funding. However, the IFS does not adequately explain how this shortfall can be addressed in the short-term. In light of the shortfall in funding, we recommend that consideration is given to suitably-located

development proposals that can assist in delivering sustainable development, whilst also making

appropriate on-site provision and financial contributions towards off-site identified infrastructure needs. Such contributions can e secured without the need for an interim CIL as is proposed for the North and Central Bucks area.

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
No

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
The draft charging schedule (DCS) applies a differential approach to setting the CIL rates, based on site status (brownfield, greenfield, and dwelling type/flats) and by zone. The DCS proposes a CIL-rate of £200/sqm for 'Other Areas (Zone B) on all greenfield sites that are not within strategic allocations (rates for sites that are allocated in the VALP are set at nil rate of £0/sqm). The DCS also proposes a rate of £80/sqm for Aylesbury and Buckingham (Zone A). The rate for greenfield unallocated sites is set at nearly double of any other rate proposed across all categories within the DCS. This appears to be an attempt to make greenfield development proposals potentially unviable or marginally viable. Setting the rate at such a high level, relative to other categories, does not in our view support the boost in housing supply that is currently required in Buckinghamshire in order to address the land supply shortfall impacting on the area. Furthermore, paragraph 3.3.25 of the DCS explains that a larger differential based on higher and lower values areas should be reflected in the charging schedule. The £200/sqm rate is applicable to 'typically higher value areas (where less development is planned)'. However, Table 7 (Appendix 5) of the DCS identifies Market Value levels applied in the scenario testing, ranging from £4,000 (Value Level 1) to £5,200 (Value Level 11). The table also indicates the relationship between value level and geographic area. It identifies greenfield sites in Aylesbury and Buckingham and the area on the edges of Milton Keynes within Core Value Levels 1-3 (within Zone A), whilst all other greenfield areas of North and Central Bucks (defined within 'Zone B') fall into value levels 5-11. On the basis of the evidence provided, it is unreasonable to include all greenfield locations of the North and Central Area that lie outside Aylesbury and Buckingham as a single zone (Zone B). The evidence shows that a differential rate is appropriate and justified for areas on the edge of Milton Keynes. We recommend that the £80/sqm rate should be applicable in these locations, which aligns with the approach taken in 'typically lower value areas' (para 3.3.26).

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social

care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
No comment, but reserve the right to submit representations following submission for examination.

Do you agree with the proposed boundaries of the different CIL charging zones?
Yes

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
We are content that the boundaries that define each Zone are broadly appropriate. However, in line with our response to question 3, we recommend that the draft charging schedule should be modified to ensure the CIL rate of £80/sqm is applied to non-strategic, unallocated sites that are located in the North Area and which are contiguous with the boundary of Milton Keynes.

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
No

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
We have reviewed the VA and raise three issues for consideration: First, Appendix 2 of the VA provides the appraisal of residential typologies whilst Appendix 3 deals with what are defined as 'Strategic Scale' typologies. The residential typologies cover sites ranging from 11 to 100 dwellings. The strategic scale sites range between 550 and 900 dwellings. Consequently, there is no appraisal of typologies covering sites and locations which range between 101 and 549 dwellings. This appears to be a gap in the appraisal process. No explanation is provided which explains this apparent omission. Second, sections 2.8 to 2.12 provide a commentary in regard to the development and other planning-related costs (including s106 and CIL) assumptions used in the typology testing. Residential typologies have been tested against £14,200/dwellings, whilst strategic scale sites have been tested against £20k/sqm and £40k/sqm. However, recent figures published by Home Builders Federation (HBF) reveals that £76,000 has been added to the cost of building a home since 2020, raising serious concerns about the viability of new housing developments across the UK. The report, The Viability Crunch, examined the cumulative impact of policy, taxation and regulatory pressures on home building. The estimated additional £76,000

cost to build per home is made up of: · More than £7,000 in taxes and levies, including £2,000 in Landfill Tax, £2,320 from the forthcoming Building Safety Levy, £2,055 in other taxes and £985 from inflationary increases on existing charges such as Section 106 agreements · Over £23,000 in regulatory costs, including £7,770 for building regulations, £5,700 for Biodiversity Net Gain (BNG), and £10,200 in costs linked to the Future Homes Standard · £37,000 in increased material and labour costs due to high levels of inflation · £7,000 in additional potential site-specific costs like nutrient mitigation requirements The increase represents over 20% of the average new home value of £365,000 (as of June 2025). Notably, HBF also submitted the report to the Coventry and Exeter Local Plan examinations recently, and in both cases the inspector has accepted it as evidence of viability. Consequently, we recommend the analysis and conclusions in the council's VA should be 'sensed-checked' against the HBF analysis. And third, we also raise concerns regard to the approach to defining differential rates, as set out in our response to question 3. Taken together, we do not agree the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates for North and Central Buckinghamshire as proposed.

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
No comment at this time, but reserve the right to submit representations following submission for examination.

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
See response to question 2

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
No further comments at this time, but reserve the right to submit representations following submission for examination.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
Yes

Please give your name
Steven Drury

Which of the following describe you?

I am a developer or planner in Buckinghamshire

Consultation respondent 29

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
At its Full Council meeting held on the 14th of May 2026, Aylesbury Town Council formally welcomed the proposed introduction of the Community Infrastructure Levy (CIL) within Aylesbury.
The establishment of a CIL charging regime is something that the Town Council has advocated for over many years, recognising its importance in securing appropriate contributions from development towards the infrastructure necessary to support sustainable growth.
The Town Council is supportive of the current proposed charging schedule for new

developments within the North and Central areas of Buckinghamshire. We consider that the schedule provides a clear, transparent and appropriate framework to ensure development contributes fairly and proportionately to local infrastructure needs.
We appreciate the opportunity to respond to this consultation and look forward to continued engagement with Buckinghamshire Council as the CIL framework is finalised and implemented.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 30

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Thank you for providing the opportunity to comment on the proposed draft charging schedule for CIL for old Aylesbury Vale area.
The parish council considered the materials at the full council meeting on 30/4/26 and resolved to submit one comment to BC, as follows:

The propsal is currently for developments that are located near to a SAC to be required to pay a lower level of CIL contribution. The parish council does not feel that this is an equitable way to

attribute the funds, and these developments should attract the same level of CIL as those located in other areas. These parishes should not be adversely affected simply due to their location next to a SAC, as SAC funding does not benefit community infrastructure.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 31

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Stoke Hammond Parish Council wishes to respond to the current Community Infrastructure Levy (CIL) consultation.

The Parish Council agrees in principle with the proposed approach and recognises the importance of securing appropriate contributions from development to support local infrastructure.

However, we would like to raise a concern regarding the exemption of flats from the levy. We believe that this may create an unintended incentive for developers to favour flat developments over other forms of housing in order to avoid CIL charges. Such an outcome could have a significant impact on the character, balance, and infrastructure demands of our community.

We would therefore urge that this aspect of the proposal be reconsidered, or that safeguards be introduced to prevent potential distortions in development patterns.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I represent a Parish / Town Council or Town Committee in Buckinghamshire

Consultation respondent 32

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
I get that the Council wants to maximise the return to Buckinghamshire from development and to ensure that we get all the benefits from major developments, in particular, that we can. Of course, I haven't seen the calculations that led to the conclusion that it was better to retain S106 rather than move to CIL once developments reach 400 houses and it might be appropriate to expose more detail of the reasoning for that to members. However, that is not my main point. One of the main advantages of CIL is that it passes 15% (25% in some cases) on to the Parish Council. They can then do things with it that the Parish believes is to the direct benefit of

Parishioners. This is, potentially, a significant factor in reducing opposition to development as well as an opportunity for Parishes to tackle pre-existing problems which are exacerbated by the development. That cannot be done with S106.

I am writing as a Ward Councillor, particularly concerned because I have a large development on the borders of my patch that has just received outline permission. There are developments in or bordering on Stoke Mandeville in your patch too. My concern is that the 400 house change to S106 cuts off significant funding to Parishes which would otherwise be used to tackle local issues resulting from local growth and also make development more difficult to sell to local people. Having said all that, I do understand the difficulty of your position. I was leader of Aylesbury Vale when our 1996 plan was drawn up, so, I have very direct experience of the difficulty of balancing often contradictory demands.

So, I have a factual question and a rather broader one. The former is a detail on the calculation that led to the suggested 400 house threshold – namely when it is said that S106 brings in more money is that more money TO BUCKS COUNCIL or more money to THE COUNCIL AND PARISH COUNCILS TAKEN TOGETHER?

The broader issue in that, even if the threshold is changed, there will be a point at which a development would provide a significant sum to a Parish Council but nothing all if it is increased by just one house. That seems really unfair. Is there a way that this cliff edge can be ameliorated?

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I am an elected representative in Buckinghamshire

Consultation respondent 33

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
This consultation is for the introduction of CIL for the North and Central areas of the County (I understand this) but in reality it's fair to assume the outcome will ultimately affect the whole County as we are trying to move everything to be the same across the County (hence the other two consultations being launched tomorrow). Therefore it's my belief that the suggestions being put forward now for CIL in the N and C areas should be promoted to all areas for consultation (actively, not just suggestive) as the outcome could have serious and severe consequences for all. Please can you advise that this will be done and Members will be made aware of this (bigger

picture)? I believe it's disingenuous to claim it only might be considered at a later stage with the Local Plan. The Local Plan is on such a tight time frame that if it is not known at this stage what is being considered or not in it, then there is no hope of it hitting deadlines.

Despite the amount received by County for large developments over 400 homes being larger if attained through S106, this often has little to no real benefit to the area being hit by the development and I believe you'd be hard pushed to find many local Members, or Parish and Town Councils who would support funds going to a central pot rather than them having CIL to counteract development locally. Will the outcome of the feedback from the consultation in regard to this be shared? I would like to request personally the insight of the number of responses who support this against those who don't.

Re parking I mentioned I have serious concerns about relaxing these guidelines. I understand this consultation is part of the local plan development. Please can you confirm, any changes would have no bearing until after the Local Plan is adopted down the line? This would be contrary to indications we've been given on other matters where policies can be considered to have some weight as the Local plan progresses through development. Most importantly it would have to be absolutely clear with no grey area as to where these guidelines could be used. I have concerns that this is just opening up developers to do whatever they please with parking as they will always be able to find a justification for bending the rules. I will of course read through the whole consultation and supporting documentation in full and respond to it.

Similarly with the design code I have grave concerns how this can apply to a whole County as large and diverse as ours, but I will go through the consultation accordingly.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I am an elected representative in Buckinghamshire

Consultation respondent 34

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?
Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?
Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?
Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?
Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?
Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Separate submission

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Not answered

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
Yes

Please give your name
Claire Britton

Which of the following describe you?

Not answered

Consultation respondent 35

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire?

Not answered

Do you support the council proposal to introduce the proposed CIL charging schedule in the north and central areas of Buckinghamshire? (Free text)

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments?

Not answered

Do you agree that, taking account of the supporting evidence, the proposed CIL rates (£/square metre) set out in the draft Charging Schedule strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments? (Free text)

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development?

Not answered

Do you agree with the different CIL rates that are proposed to apply to different zones and different types of development? (Free text)

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities?

Not answered

Do you agree with the proposed exemption from CIL for developments by a predominantly publicly funded or not-for-profit organisation including medical and health services, social care, education, emergency services, waste facilities, community facilities, sport and leisure facilities? (Free text)

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites?

Not answered

Do you agree with the proposal to charge a nil rate of CIL for the development of strategic sites? (Free text)
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones?
Not answered

Do you agree with the proposed boundaries of the different CIL charging zones? (Free text)
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed?
Not answered

Do you agree that the viability evidence (set out in the report prepared by Dixon Searle Partnership) provides a suitable evidence base for the introduction of the CIL rates as proposed? (Free text)
Not answered

Do you agree with the proposed instalments policy?
Not answered

Do you agree with the proposed instalments policy? (Free text)
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL?
Not answered

Do you agree that the evidence (set out in the Infrastructure Funding Gap statement) demonstrates a significant funding gap and hence the desirability of introducing CIL? (Free text)
Not answered

Please provide any further comments you have concerning the proposed introduction of a CIL in North and Central planning areas of Buckinghamshire Council (corresponding to the area of the former Aylesbury Vale district) (Free text)
Community Infrastructure Levy Draft Charging Schedule

Historically, SettleParadigm has applied for and received 100% relief of CIL due to the provision of affordable housing, an approach which has often supported scheme viability and we would not expect this to change.

Do you wish to speak at the public examination of the draft CIL Charging Schedule?
No

Please give your name
Not answered

Which of the following describe you?
I am a developer or planner in Buckinghamshire