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Ealing CIL Representations - John Lewis Partnership

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Dear Sir/Madam,

London Borough of Ealing - Draft Charging Schedule Consultation Representation submitted on behalf of the John Lewis Partnership PLC.

This representation is submitted by Savills (UK) Limited (hereafter 'Savills') on behalf of the John Lewis Partnership PLC (hereafter 'JLP') in respect of the London Borough of Ealing's (hereafter 'LBE') consultation on their proposed Community Infrastructure Levy (hereafter 'CIL') Draft Charging Schedule (hereafter 'DCS').

The John Lewis Partnership is the UK's largest employee-owned business, operating two of Britain's best-loved retail businesses – John Lewis and Waitrose. Founded over 100 years ago, the company has been built on a vision to ensure better ways of doing business by benefitting its Partners, customers, suppliers and the communities in which it operates. To date, JLP has been a principal source of employment for the local community in West Ealing.

As JLP's retail business has expanded over many years, it has grown a sizable property portfolio of shops, warehouses and previously developed land. By transforming some of its supermarket and car park 'brownfield' sites, JLP has the opportunity to upgrade some of its stores and provide much-needed homes, including as much affordable housing as is commercially viable, in the communities it serves.

These homes will be purpose-built for renters, developed and managed by the JLP, which means it's in JLP's interest to deliver high-quality buildings that are thoughtfully designed, with the same commitment to high standards as it applies to its John Lewis and Waitrose shops. Residents would rent directly from a trusted business, providing them with greater certainty of tenure.

Many of JLP's stores and landholdings are close to transport links and amenities - and the company believes it has a social responsibility to make as best use of these sites as possible given the housing crisis.

JLP has a planning application pending a decision in West Ealing to deliver a mixed-use scheme which will incorporate the delivery of a new, flagship food store, flexible commercial space, improvements to the streetscape, open spaces and landscaping, as well as the delivery of 428 high-quality homes, including a proportion of affordable housing. The scheme will regenerate and optimise the current brownfield site with a focus on creating a strong integrated community.

JLP is committed to supporting the community's infrastructure needs and is actively seeking a CIL rate that enables the sustainable development of affordable housing and public amenities to be brought forward, ensuring long-term benefits for local residents.

Therefore, the purpose of this representation is to set out our response to the proposed CIL DCS and supporting documents, which have been published for consultation from 28th of February 2024 until 10th of April 2024.

JLP is supportive of the principle that development helps to deliver needed infrastructure across the Borough. The objective of this representation is therefore not to oppose CIL; it merely seeks to ensure a reasonable rate is proposed, which will enable the planned development in the area to come forward.

Whilst the Council has informed their proposed CIL DCS by viability evidence which comprises the Viability Assessment[1] undertaken by BNP Paribas Real Estate 'BNP' in December 2023. There are a number of concerns with respect to the proposed rates and the wider planning policy backdrop. JLP supports a transparent, evidence-based approach to determining CIL rates, ensuring they reflect realistic development costs and market conditions to benefit all community stakeholders.

JLP advocates for an open and constructive dialogue with LBE to refine the viability evidence and ensure the CIL rates foster a supportive environment for both community infrastructure and new developments.

JLP's particular comments in regard to this consultation can be summarised as follows:

- **National Planning Reform** – The Government undertook a consultation about reform to the planning system within the Planning White Paper[2] with a proposal to abolish Section 106 and CIL. Most recently

[1] London Borough of Ealing: Local Plan Viability Assessment, prepared for London Borough of Ealing by BNP Paribas Real Estate, December 2023
[2] Ministry of Housing, Communities & Local Government Planning for the Future, White Paper, August 2020

the Levelling-up and Regeneration Act[3] sets the framework for the Government to introduce a new Infrastructure Levy to replace CIL. The Department for Levelling Up, Housing and Communities ran a consultation on the Infrastructure Levy which closed on 9th June 2023. A further consultation on the drafting of those regulations will be published in due course. In light of this uncertainty, it is not clear whether CIL will remain applicable in due course.

- **Emerging Local Development Plan** – LBE is currently consulting on a Regulation 19 version of their emerging Local Plan. There is therefore no guarantee of the schemes that will be delivered over the plan period. It can therefore be viewed that the consultation on the proposed CIL DSC is premature.

- **Interpretation of viability testing** – JLP is seeking further clarity on how BNP has formulated their suggested CIL rates from the viability evidence and testing. JLP believes that a number of the key viability inputs adopted in the updated viability evidence undertaken by BNP are not reflective of the industry standards, which results in an overestimation of the potential for CIL in the Borough.

- **Risk to Housing Delivery** – Within the Local Plan, Ealing is identified to provide 21,570 homes over the 10 years 2019/20 to 2028/29 – an annual average requirement of 2,157 homes. In the last 4 years, there has been a shortfall in delivery of 2,262 homes. Furthermore, because Ealing has failed its Housing Delivery Test, a 20% buffer is applied to its housing targets, increasing its annual target to 2,609 units. According to the Ealing Housing Trajectory Evidence Base, this gives a total cumulative requirement of 15,656 homes over the next five years, which equates to 3,131 homes a year over the next five years. Given the historic under delivery, meeting housing needs over the next 10 years will be a significant challenge and adding to development costs by increasing the CIL contribution will only make this worse.

These points are discussed in greater detail in the following sections.

Legislation

It should be noted that this representation is made in the context of The Community Infrastructure Levy Regulations 2010 (as amended) (“the Regulations”) and relevant statutory guidance. The most recent amendments to the Regulations and associated guidance came into force on 1st September 2019. The CIL consultation will therefore be subject to the requirements of these latest set of Regulations and Guidance.

[3] https://bills.parliament.uk/bills/3155

Overview

On behalf of JLP, we have analysed the available evidence, viability testing and the proposed CIL rates. The objective remains to ensure a reasonable rate of CIL, which allows for the policy requirements for sustainability and affordable housing, anticipated residual Section 106/ 278 and other site-specific infrastructure.
We have therefore split our response in to the following Sections:

- **Part 1** - Planning Overview and Housing Land Supply;
- **Part 2** - Viability Testing;
- **Part 3** - Interpretation of Results; and
- **Conclusions** - Overview of key concerns and proposed CIL rates.

In submitting this representation, we are only commenting on particular key areas of the evidence base. The lack of reference to other parts of the evidence base cannot be taken as agreement with them, and we reserve the right to make further comments upon the evidence base at the Examination stage.

Part 1 – Planning Context, Overview and Housing Land Supply

Housing Crisis

The nation is in the grip of a housing crisis. National demand is thought to be close to 4.3 million homes; which would take half a century to rectify should the current annual target of 300,000 homes from the Government be met[4]. In 2019-20, 248,591 net dwellings were built, falling to 217,754 in 2020-21 and for the subsequent two years the number of new homes has not exceeded 235,000 – this represents a shortfall of 263,655 homes in that four year period, reflecting a downward trend in housebuilding which is expected to continue[5].

The London Mayor notes in his foreword to the London Plan that the affordable housing market is in crisis and there are 'no quick fixes to the housing crisis London faces'. In London, which is required to be considered a single housing market (see London Plan at 1.4.4), there were just 13,501 new homes completed in 2023, down 48 per cent from the number of completions for the same period in 2024[6]. Whilst claiming a record number of

[4] https://www.centreforcities.org/publication/the-housebuilding-crisis/#:~:text=Compared%20to%20the%20average%20European,homes%20a%20year%20is%20reached.

[5] https://www.building.co.uk/focus/uk-housebuilding-recession-how-much-worse-is-it-going-to-get/5126399.article
[6] https://www.standard.co.uk/homesandproperty/property-news/crbe-london-hot100-new-homes-london-b1141759.html

affordable housing ‘starts’ as 116,000 homes from 2015-16 to 2022-23 have started, completions are significantly behind this as only 63,817 affordable homes were completed from 2015-16 to 2022-23.

Development Plan

LBE’s currently adopted Development Plan is made up of different Development Plan Documents (DPDs). The DPDs have full weight (together with ‘made’ neighbourhood plans where relevant) in determining planning applications and development decisions within the Borough. Applicants need to have regard to the following documents:

1. The London Plan, 2021
2. Development (or Core Strategy) DPD, April 2012
3. Development Sites DPD, December 2013
4. Development Management DPD, December 2013
5. Joint West London Waste Plan, July 2015
6. Planning for Schools DPD, May 2016

LBE has a 21,570-uhome, 10-year housing supply target identified in the London Plan for the period 2019-20 to 2028-29. This forms an annual target of 2,157 homes for the rest of the Local Plan period.

The Development Sites DPD has identified opportunities on specific sites which will deliver dwellings over the plan period.

Policy 3A seeks to deliver 50% on-site affordable housing delivery across the Authority Area, although this has been superseded by the newer London Plan’s Policy H5, which outlines the 35% Fast Track approach.

Emerging Plan

At the time of writing, LBE is currently consulting on a Regulation 19 version of their emerging Development Plan. Ealing’s Local Plan will shape and guide future development in the area over the next 15 years from 2024 to 2039. The Plan includes a strategic vision and spatial strategy, a collection of seven Town Plans which provide place-based strategies and spatial policies along with accompanying Development Sites (or site allocations), as well as the criteria-based development management policies that will help guide future development in the Borough.

Emerging policy HOU outlines that the Fast Track route (as set out in Policy H5 B 1) of the London Plan) in Ealing will only apply to schemes providing at least 40% affordable housing and a tenure split of 70% social rent and 30% intermediate.

Housing Delivery

There has been a shortfall in the delivery of 2,262 homes over the past four years, compounding this target. Furthermore, because LBE has not met its Housing Delivery Test, a 20% buffer is applied to its housing targets, increasing its annual target to 2,609 homes. According to the Ealing Housing Trajectory Evidence Base, this gives a total cumulative requirement of 15,656 homes over the next five years. Which equates to 3,131 homes a year, over the next five years.

LBE's own Five Year Housing Land Supply Position Statement and Housing Trajectory evidence base document (hereafter '5YHLS&HTS') highlights the Borough's shortfall in delivery and supply, outlining that only 3.7 years' worth of housing land supply can be evidenced as part of their Draft New Local Plan (hereafter 'DNLP'), equating to an absolute shortfall of 3,935 homes.

Part 2 – Viability Testing

We reviewed the Viability Assessment produced by BNP in December 2023[7] and welcome that the Council have updated their viability evidence. We do, however, have a number of concerns with regard to this evidence, including some of the assumptions adopted, the range of typologies tested and the viability analysis to inform the proposed CIL rates.

We would therefore like to highlight these points and seek further clarification in regards to the justification for adopting a number of the assumptions included within the viability testing.

Profit Margin

BNP has adopted a profit assumption of 17.5% on Gross Development Value (GDV) for private dwellings and 6% on GDV for affordable dwellings. This reflects a blended rate of 12.9% on GDV for areas with policy-compliant affordable housing provision at 40%. The Planning Policy Guidance ("PPG") [8] considers a reasonable return to the developer of 15-20% of GDV based on risk. The minimum profit margin that we are observing in the current market, on residential development, is a blended rate of 20% on GDV.

JLP suggests revisiting the profit margin analysis to ensure it aligns with current market expectations, fostering a collaborative effort towards sustainable development goals.

[7] London Borough of Ealing – Community Infrastructure Levy Viability Study, BNP Paribas Real Estate, December 2023;
[8] Paragraph: 018 Reference ID: 10-018-20190509

It should be recognised that there are many different types of developers and many different types of sites that will affect the appropriate GDV that will see sites delivered. This approach has been supported by an Inspector in relation to two residential development sites in Southend-on-Sea:

"Most of the development risks remains and so, although I am aware that in some parts of the country developers are prepared to accept a return of 15%, for this appeal I accept the assertion of both parties' experts...that a risk reward return of between 20% and 25% is a reasonable expectation for profits whether calculated on GDV or on costs, with expectations for profits calculated on the latter basis being sometimes higher still" [9] *(Paragraph 6).*

The Inspector also acknowledged the outcomes of the following appeal decisions, which supported a higher blended profit rate than currently reflected in BNP's viability testing for LBE:

- **Land at the Manor, Shinfield** [10] – accepted evidence submitted by six national housebuilders on their targets and supported a blended rate of 20% on GDV;

- **Land at Lowfield Road, Rotherham**[11] – supported a rate of 22%, made up of 15% profit and 7% overheads.

We would therefore ask that the Council reviews their viability evidence and includes a blended profit rate of at least 20% on GDV.

<u>Section 106/ Section 278 Works</u>

The Viability Assessment assumes an allowance of £5,000 per residential unit and £25 per square metre of non-residential development for Section 106 contributions. In addition, there is an allowance for Section 278 works of £1,000 per residential unit and £25 per square metre for commercial developments. JLP wants to ensure the proposed development makes a positive contribution to the wider community, however believes it is important to align Section 106 contributions with historical precedents and future expectations, to ensure its proposals make a positive community impact.

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[9] Paragraph 6, APP/D1590/Q/14/2228062 , P W Clark MA MRTPI MCMI, 7th January 2015 and Paragraph 6, APP/D1590/Q/14/2228065
[10] APP/X0360/A/12/2179141, Paragraph 44
[11] APP/R4408/Q/14/2216976, Paragraph 33

Based on our experience of advising on recent schemes across the Borough, Section 106 obligations in respect of Education alone can be significant and vastly over the £5,000 per dwelling allowance which has been made within the testing.

As there is no longer a requirement for the Local Planning Authority to maintain a Regulation 123 List, JLP believes that there may be potential to double count CIL receipts and Section 106 payments being sought for the same infrastructure requirements.

JLP therefore requests that the Council provide analysis on Section 106 obligations sought across the Borough for a range of schemes to clarify that the allowance within the viability testing is reflective of future Section 106 requirements.

In addition, JLP requests that the Council to provide their Regulation 123 List as soon as possible so all parties can better understand those projects or types of infrastructure that the Borough intends to fund, or part fund, through CIL.

Typologies

JLP proposes an inclusive review of the development typologies to ensure a broad and accurate representation of schemes likely to be delivered across the Borough which support diverse community needs have been tested. It is not clear whether a typology which includes build-to-rent tenure housing has been tested. Whilst there is reference to this tenure and the testing results within the Viability Assessment, it is not clear where these have been included and analysed.

In addition, we highly recommend that the Council considers undertaking site specific typology testing so that actual pipeline schemes can be accurately modelled to assess viability. This is an approach which has been adopted by a number of Ealing's neighbouring Boroughs when they were consulting upon their proposed CIL DCS.

In light of the emerging nature of Ealing's Development Plan, we highlight that there is no guarantee that schemes similar to the typologies tested will be delivered during the plan period. JLP requests that a wider range of typologies with mixed tenures, types and a wider number of homes be modelled as currently their proposed scheme does not fit into any of the typologies modelled. This approach will ensure that the schemes that LBE are aware of, and are in the planning pipeline, are accurately assessed.

Residential Sales Prices

Having assessed the revenue assumptions that BNP have adopted within the updated Viability Assessment, JLP recommends a comprehensive review of the evidence underpinning the residential sales and rental assumptions to ensure that they reflect the latest market data for greater transparency and accuracy.

BNP have sourced their residential transactional evidence from the Land Registry. The Land Registry is currently experiencing delays in their processing times, particularly associated with first registrations, which has been largely attributed to processing capabilities following the pandemic. In accordance with Government Guidance: HM Land Registry, on average it takes 17 months to register new build property. We understand that the evidence which has informed BNP's assessment of residential sales values ranges from January 2021 to July 2023. We recommend that a wider range of comparable evidence is sought and relied upon highlighting values achieved post-July 2023.

JLP also notes that the same sales values have been adopted for flats and houses on a pound per square foot basis- we do not feel this is an accurate representation of achieved values across these unit types.

In light of the above we are expecting the current conditions to remain for at least the next 12 months. We recommend that the Council revisit their affordable housing values to ensure they are accurate in light of the market uncertainty.

<u>Build Costs</u>

JLP advises considering a wider range of data sources beyond BICS for build costs to capture site-specific variables, ensuring a more accurate financial model. Although this provides a starting point, we recognise the challenges associated with BCIS, including sample size and the issue that the costs are not site-specific. Additionally, we note that BNP has made no allowance for abnormal costs on top of this estimate.

BNP has adopted the same build cost to each typology. Typically, a developer would not build at the same rate if they were to build less than 10 houses compared to a scheme for above 100 houses or a 2-storey house or a 20- storey block of flats. Each typology will suit varying developers. For example, schemes above 100 houses will likely be built out by PLC housebuilders who will be able to build at more competitive rates compared to SME housebuilders.

We would further recommend that build costs be modelled depending on whether the site represents greenfield development or brownfield development and whether they are houses or flats and above or below 6 storeys. JLP's scheme represents a brownfield site which will demand higher construction costs as opposed to undeveloped land. Their estimated build costs therefore significantly exceed the assumptions adopted by BNP.

It is essential that the base build costs being modelled are correct to ensure that there is not a significant underestimation of the true costs of development. A number of the other assumptions adopted – contingency, externals and professional fees are based upon the base build costs, therefore, a number of cost elements could be vastly underestimating the true costs of delivery. We would therefore recommend that these figures be further reviewed and remodelled.

Abnormals / Exceptional Costs

Abnormal costs, referred to as 'Exceptional Costs' within the Viability Assessment, capture the impact of additional development costs, such as archaeological investigation, water diversion, ground remodelling and stabilisation and pumping stations, which may be required on both Brownfield and Greenfield sites. We note that no allowance has been made within the viability testing for exceptional costs.

These costs are not viewed as 'exceptional' on larger schemes delivered; they are relatively common when developing schemes of scale and complexity.

JLP has estimated abnormal costs of approximately £1,080,000 for demolition and £6,920,000 for infrastructure works alone. These sums are significant and are not considered unusual for schemes of this nature. A key part of JLP's philosophy is to enhance the local streetscape, building a safer, more accessible community for our neighbours, customers and future residents.

JLP is also seeking to bring forward a successful but underutilised supermarket site for a mixed use residential led scheme. As a result there is a need to provide a replacement supermarket at significant physical and operational cost but without the creation of additional value.
We strongly recommend that the Council reassess their inputs within their Viability Assessment to ensure that the modelling is reflective of schemes that will be delivered across the Borough over the Plan period.

JLP encourages the inclusion of an allowance for exceptional costs to ensure all potential development challenges are adequately planned for, supporting a more accurate and comprehensive viability assessment.
Given the nature of land likely to come forward for development within the Borough, we urge that an appropriate allowance is modelled either as a combined cost per dwelling for infrastructure or as a standalone development cost.

Contingency

JLP recommends the inclusion of a contingency allowance as a standard practice within development appraisals to account for unforeseen development costs or overruns, enhancing the robustness of financial planning. Typically, a contingency allowance is between 5-10% of the base build cost depending on a range of factors including the complexity of the development, potential for abnormals or remediation costs and the scale of development. This is particularly important for JLP's which represents a complex, brownfield redevelopment scheme. We would recommend that the Council consider adopting a 10% contingency on the construction costs in line with market practice and considering the site specific complexities associated with JLP's site.

Development Finance

Given the current economic climate, JLP believes revising the development finance rate to reflect market conditions would provide a more accurate financial assessment.

In 2023, the Bank of England consistently raised the base rate from late 2021, reaching a high of 5.25% in August 2023. The UK economy fell into recession during the final three months of 2023, according to official figures. As a result of the increases in the base rate, borrowing costs have increased, surpassing prime real estate yields. Whilst inflation has fallen significantly from its peak, it is still above the Bank of England's target of 2.0% and it is unclear when and how quickly rates may fall.

Currently, the Bank of England's Base Rate still stands at 5.25% which has been held for a fifth consecutive time.

Therefore, a finance rate between 8.0 - 8.5% which reflects an increase above the Base Rate, is deemed more appropriate when accounting for arrangement fees and exit fees. As such, we are of the view that the adopted rate of 6% within BNP's Viability Assessment is not reflective of market conditions and will overestimate the typologies' viability.

Part 3 – Interpretation of Results

We note that there has not been any explanation provided by BNP in regard to the methodology for using the results from the viability testing to calculate the proposed CIL rates for 'Large-purpose built shared living (LSPBSL) and other Houses in Multiple Occupation'. JLP seeks to work hand-in-hand with local authorities to develop a methodology for CIL rates that supports vibrant, sustainable communities and reflects a shared commitment to enhancing local infrastructure and housing availability.

It is clear that people's needs and demands are changing. The housebuilding industry is experiencing a clear desire from people for homes with more space, so they can accommodate working at home more easily and have better and larger indoor and outdoor spaces. These changes will have an upward impact on cost, but not necessarily on revenue.

In creating a build-to-rent product that includes considerable indoor and outdoor amenity space that will be available for residents to rent for the long-term, JLP are responding to changing needs in a way that they hope can foster cohesive and vibrant communities. It is also worth considering that there is a material difference in the financial dynamics of build-to-rent compared with traditional housebuilding which creates properties that are sold off rather than managed for the long-term by a single owner, as JLP plan to do.

BNP also states that it may be necessary for the Council to have a flexible approach in regard to affordable housing across these sites. Whilst it's an approach that can be adopted by the Council, the CIL Regulations and PPG guidance indicate that CIL rates should be based on current planning policy requirements. Relying on affordable housing as a tension release where CIL rates are set above viable levels is not in the spirit of this and risks sites being delayed in coming forward for development; a particular concern given the shortfall in delivery of new housing.

It also means that a key objective of the planning system might not be met – the delivery of homes to meet all needs across the Borough. It cannot be right that the impact of CIL would prevent the minimum objectively assessed needs for affordable housing and so impact the most vulnerable in society. It also runs counter to the Government's reasons for introducing the Infrastructure Levy – which is being designed to ensure that it doesn't act in the way that CIL does in reducing the amount of affordable housing delivered.

In light of our above observations, we would request that BNP clarify how the proposed CIL rates have been calculated.

<u>Application of Buffer</u>

We believe that BNP has not considered the CIL Guidance which highlights the importance of the Charging Schedule Authority recognising an appropriate balance when determining CIL rates to ensure the delivery of housing, especially affordable housing, is not compromised. The PPG requires that CIL is not set at the margins of viability and an appropriate 'buffer' is included to ensure the levy rate remains able to support development when economic circumstances adjust[12]. JLP advocates for the application of a buffer in CIL rate testing, as suggested by guidance, to ensure a balanced approach to supporting development while maintaining affordability.

[12] Ibid. Paragraph 020, Reference ID 25-020-20140612, CIL Guidance (2014)

We recommend that when interpreting the results of their CIL appraisals, in order to take into account, the risk factors , varying viability and unknown nature of pipelines scheme to be delivered across the Borough during the plan period, the Council consider setting the CIL rates at a discount of 40% to the maximum rates.

Viability Evidence

Based on the above analysis, the Council has not demonstrated that the suggested CIL rates are striking a suitable balance or are supported by accurate viability evidence. JLP is focused on creating value for communities through sustainable development, which includes providing high-quality, discounted market rent housing. A balanced approach to CIL rates is crucial to realising these community benefits without compromising financial viability and ensuring that as much development can be delivered, especially on brownfield sites. It is therefore essential that additional testing is undertaken (in light of the above) and the CIL rates are reviewed.

Conclusion

The assessment of planned development and its viability is an inherent test of the CIL Examination, making the following points significant:

- **Planning Uncertainty -** In light of the uncertainty of the national planning system and continuation of CIL, JLP highlights the importance of stability and predictability in the planning landscape to ensure that long-term investments in the community can proceed without unnecessary delays, benefiting local residents and businesses alike. In addition, the emerging nature of LBE's Development Plan highlights the prematurity of this DSC CIL consultation. We do strongly advise that the Council reassess whether it is an appropriate time to consider adopting a new CIL Charging Schedule ahead of their emerging Development Plan being adopted.

- **Incorrect Assumptions -** There are a number of incorrect assumptions adopted within the viability testing resulting in an overestimation of the maximum CIL rates so we ask for further clarification from the Council.

- **Unviable Rates -** It remains unclear how BNP has formulated their proposed CIL rates from the viability evidence and testing. The results tables indicate that some of the typologies tested with their proposed CIL rates are unviable.

- **Application of Buffer** - It is fundamental that a **minimum** viability cushion of **40%** should be adopted within the proposed CIL rates to minimise risk to the housing supply, particularly when LBE have historically failed their Housing Delivery Test and are unable to demonstrate a prospective 5YHLS.

- **Risk to Housing Delivery -** It is clear that there is an urgent need to boost supply in LBE, not only to meet the overall need for new homes but in particular the need for affordable homes. There has been persistent under delivery and only 3.7 years' worth of housing land supply can be evidenced as part of their Local Plan. If CIL is set at an unviable rate, this significantly risks the ability of the Council to deliver the required housing needs during the plan period.

We would therefore strongly advise that additional viability testing, including site specific testing of pipeline schemes, be undertaken and the proposed CIL rates be reviewed in light of the points raised above.

We would like to reiterate again that the JLP supports the implementation of CIL within the Borough, but wants to ensure a reasonable rate is adopted. A blanket CIL rate which does not account for abnormal development costs is likely to impact on the delivery of new homes and affordable housing.

Moving forward, JLP is open to a meeting with LBE and its advisors to discuss the approach taken and to discuss common ground.

Yours faithfully,

[redacted]