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Delivered by email

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Dear Ian

Stratford on Avon District Council (SDC) Community Infrastructure Levy (CIL) Examination

Following publication of SDC's document titled '*SDC Response to Examiner's Questions*' (dated April 2017), and the accompanying '*GLH appraisal in response to the Examiners Questions 7 Mar 17*' spreadsheet document prepared by consultants PBA/EPD, on 19th April 2017, IM Properties (IM) has now reviewed this additional evidence.

At the Examiner's request, IM has prepared this concise response for the Examiner's consideration in finalising conclusions and reporting on the CIL Charging Schedule and Examination.

IM welcomes SDC's recommendation to the Examiner for a CIL rate of £0 (NIL) for both GLH and LMA strategic sites. IM notes that this is based upon the updated viability appraisal evidence prepared by PBA/EPD in response to the Examiner's questions of 7th March 2017.

In summary, the latest appraisal for GLH prepared by PBA/EPD concludes that there is no potential viability headroom for CIL. Indeed, it identifies the headroom to be negative at -£19 per sqm. On this basis, PBA/EPD and SDC recommend a CIL rate for the GLH strategic site of £0 per sqm.

We note that the latest appraisal for GLH prepared by PBA/EPD does not correlate exactly with IM's own analysis, and there remain differences of opinion in relation to several inputs. However, the ultimate conclusion is now the same between all parties.

Common ground has therefore been reached and IM accepts SDC's recommendations for a CIL rate of £0 (NIL) at GLH.

From a procedural perspective we note that either SDC has not yet provided a modified CIL Charging Schedule to the Examiner, or that IM has not been party to this document.

On the basis that SDC has unequivocally proposed a CIL rate of £0 (NIL) for both GLH and LMA strategic sites, and in the absence of a modified CIL Charging Schedule, it would be our expectation that the

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Examiner's Report advocates the appropriate modifications to the existing '*SDCL CIL Submission Charging Schedule*' (Examination document EBD1) to fully reflect SDC's proposals.

To be specific, this would necessitate the modification of Table 1 within EBD1. The modifications required are, in our view, as follows:

- Replacing the redundant '*CIL £ per sqm*' rate of £110 for residential development '*At Gaydon/Lighthorne Heath new settlement*' with the agreed '*CIL £ per sqm rate*' of **£0**.
- Replacing the redundant '*CIL £ per sqm*' rate of £75 for residential development '*At Long Marston Airfield*' with the agreed '*CIL £ per sqm rate*' of **£0**.

Following publication of the Examiner's Report, it would be our expectation that SDC adopts a revised CIL Charging Schedule inclusive of the above modifications.

We look forward to notification of publication of the Examiner's Report, and would be grateful if you could please confirm the anticipated timescale for this.

Should you, or the Examiner, have any further queries in the interim please do contact me. We would be happy to assist.

Kind regards



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