KS TOWN PLANNING

[redacted]
E – [redacted]
T – [redacted]

Planning Policy Team
Broxbourne Borough Council
Bishops' College,
Churchgate,
Cheshunt EN8 9XQ

By email to: planningpolicy@broxbourne.gov.uk

12th July 2026

Dear Planning,

Re: CIL Consultation response

Thank you for inviting comment (by Monday 20th July at 5pm) on proposals to introduce a Community Infrastructure Levy (CIL) specifically for developments of between 1-9 dwellings within the Borough.

As the Council is aware, both locally and nationally, low levels of delivery of new homes have created a crisis. At national level, the Government is falling significantly short of its pledge to deliver 1.5 million homes over its term. Locally, (as recently confirmed by the Planning Inspectorate in appeal ref. 6003023) the Council is falling considerably short of achieving a Five-Year Housing Land Supply, with it currently only able to demonstrate only 2.13 years supply. There is clearly a requirement for the delivery of significant numbers of new homes to accommodate local households - with the NPPF recognising that "*small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly*".

Unfortunately, it is also often these smaller sites that are more greatly impacted by issues of viability – potentially arising from: acquisition/demolition costs; disproportionally high construction costs (without the benefit of economies of scale); the ability of smaller developers to fund "risky" developments that do not attract lenders; and additionally the increasingly high costs of making a planning submission together with the uncertainties of securing a positive decision.

As such, I would suggest that these smaller sites are disproportionally more vulnerable to issues of economic viability.

The appraisal by Dixon Searle Partnership recognises the disparities between viability across these smaller sites. The appraisal also acknowledges (through reference to the author's previous work within the Borough) the number of viability appraisals which are undertaken and demonstrate the lack of affordability of a fully policy compliant package of planning obligations.

As such, I am concerned that a CIL charge, without the ability to demonstrate a development's specific viability issues and negotiate affordable payments, would result in the loss of some small development sites that would otherwise make a valuable contribution towards housing need within the Borough. I would therefore suggest that continuing to negotiate contributions by agreement under Section 106 of the Act would be a fairer and more practical way forward.

Whilst I recognise that a CIL approach is more transparent for developers to understand at the outset – similar transparency, consistency, and certainty could be achieved by producing a Planning Obligations SPD which sets out standard charges, whilst retaining the opportunity for viability to be argued on case-by-case assessment of merit. This alternative would ensure that small housing sites can continue to be delivered, whilst ensuring that the Council receives affordable contributions towards the costs of community infrastructure.

Yours sincerely,

Katie Smith

Kathryn Smith, BA(Hons), MA, MRTPI

RTPI
Chartered Town Planner

IED Institute of Economic Development
Inspiring people - Improving places

Sustainable Growth
Executive Director Mark Doran

Hertfordshire

Broxbourne Borough Council
Bishops' College
Churchgate
Cheshunt
Herts
EN8 9XQ

Sent by email to:
Planningpolicy@Broxbourne.gov.uk

Growth and Infrastructure Unit
Hertfordshire County Council
Postal Point CHN114
County Hall
Pegs Lane
Hertford, Herts SG13 8DF
www.hertfordshire.gov.uk

Tel: 0300 123 4040
Email: [redacted]

Date: 17 July 2026

Dear Planning Policy

Community Infrastructure Levy (CIL) – Draft Charging Schedule Consultation

The county council very much welcome the opportunity to comment on the above, acknowledging the charge would only apply to developments of between one and nine new residential dwellings.

The following services have provided input:

Air Quality (Sustainable Growth)
Growth & Infrastructure
Historic Environment
Lead Local Flood Authority
Public Health
Transport for Hertfordshire
Waste Management

The county council would suggest that there should also be a reference to Hertfordshire County Council who as Education Authority, Fire and Rescue Authority, Highways Authority, Social Services Authority, and Waste Disposal Authority etc. are the major infrastructure provider within the Borough of Broxbourne.

Furthermore, it is noted that within the documentation that infrastructure is defined as *"(but not limited to) facilities for transport, education, health, social infrastructure, green infrastructure, public services, utilities and flood defences*". However, we request that waste management is listed alongside the other services to act as a hook should a request for CIL funding be required. Whilst the county council acknowledges the text "but *not limited to*", Waste management is a service used by all residents and in the context of LGR would not want to preclude such a key service.

The county council will continue to seek S106 contributions where infrastructure is required to mitigate development and is not fully funded through CIL (acknowledging the scale at which CIL is being applied) and that we will bid for CIL funding to ensure that mitigating infrastructure is secured.

To conclude, the county council strongly supports the Borough of Broxbourne with the implementation of a charging schedule for these “smaller sites”.

Yours sincerely,



Ben Bowles
Senior Planning Officer, Growth & Infrastructure Unit

From: David Amor
To: Planning Policy
Cc: [redacted]
Subject: Proposed CIL charge
Date: 12 July 2026 10:12:52

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

morning,

Don’t people of Broxbourne already ‘contribute’ via national and local taxation so why should they have to pay more?

Thank you

mr David Amor

Broxbourne Resident

[redacted]

Sent from my iPad