COUNCIL

20/08/26

For August 2026 Full Council Meeting

Agenda 14p Correspondence from Stephen Rickhards, Huggins Marine and Ideal Homes SW regarding CIL (Community Infrastructure Levy) and subsequent responses from Cornwall Council, Infrastructure Team at Cornwall Council

1. Letter from S Rickhards (Construction Design Consultancy Ltd)
2. Email from Ideal Homes SW
3. Email from Huggins Marine
4. Reply from Infrastructure Team at Cornwall Council to S Rickhards
5. Reply from Infrastructure Team at Cornwall Council to Ideal Homes SW
6. Reply from Infrastructure Team at Cornwall Council to Huggins Marine
7. Attachment to reply from Cornwall Council (4 pages)
8. Email reply from Huggins Marine to Infrastructure Team at Cornwall Council (3 pages)
9. Email reply from Infrastructure Team at Cornwall Council to Huggins Marine

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07852 692529
steve.rickhards@gmail.com

13th July 2026
To Milly Southworth
Clerk to Torpoint Town Council
By e mail clerk@torpointtowncouncil.gov.uk
c.c. Catherine Thompson cil@cornwall.gov.uk

Dear Milly,

Ref: C.I.L. CHARGES AND DEVELOPMENT IN TORPOINT

Hi Milly,
I know it has been some time since we last spoke but I thought that I would write to you directly so you could hopefully pass on my comments to Council Members. I am now in a new organisation but still actively engaged in making planning applications in your area.

I am writing to express my concern as an Architect regarding the direct effect that C.I.L. charges are having on our ability to be able to progress projects in Torpoint specifically, but also in adjoining areas such as Millbrook

With margins between ever increasing building costs and fairly static sales values, the additional tax burdens placed on developers in the form of C.I.L.: section 106, and coastal protection taxes, has caused developers to seriously consider whether development is worth pursuing at all.

A good analogy to this situation was when the government, several years ago, attempted to boost declining town centres and city centres by allowing permitted development for residential development over retail street level outlets.. This resulted in an immediate reaction from developers, and several schemes soon came forward in town centres including Plymouth.

In Plymouth, the later C.I.L. Free Zones created by the Council caused a notable and speedy upsurge in projects coming forward in those areas.

With young people struggling to get on the property ladder or seeking good quality rental accommodation in the Plymouth and E Cornwall areas, Torpoint offers a potential more affordable option with an easy commute into Plymouth for work.

The demand for office space in Torpoint has been static for many years, as it is everywhere, but Torpoint could offer a quality environment for living, which if allowed to flourish would also encourage growth in service industries and retail development.

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Whilst we realise the need for local councils to raise funds for community betterment and to fund increasing demand on infrastructure such as schools, medical demands open spaces, etc, which new homes can instigate, there is no point in having such a system if it stops development happening in the first instance.

It is also recognised that Torpoint has the lowest C.I.L. rate in Cornwall.

We are not suggesting eliminating C.I.L. but imposing an 24 month moratorium on C.I.L. charges to boost development in Torpoint and kick start the regeneration of the area, even if it had to be reimposed after that period. (24 months being a reasonable period to allow for planning and construction of schemes)

There are wonderful opportunities for Torpoint to raise its profile and increase its population, which in turn would boost council tax revenues. Torpoint needs to establish itself as an attractive venue in it's own right for people to live in and work and visit, rather than a place that you "pass through" from the ferry heading into Cornwall

I thank you for the time taken in reading this letter and hopefully your response.

Kind regards
Yours sincerely
Steve Rickhards
For and on behalf of
Construction Design Consultancy Ltd

Please respond by e-mail to steverickhards@gmail.com
Or mobile 07852 692529.

Yours sincerely
Stephen Rickhards
For and on behalf of
Construction Design Consultancy Ltd.

Milly Southworth

From: Ideal Homes SW :: Stuart Nicholls <stuart@idealhomes-sw.co.uk>
Sent: 17 July 2026 09:16
To: clerk@torpointtowncouncil.gov.uk; Hugginsmarine
Cc: Catherine.Thomson@cornwall.gov.uk
Subject: CIL Charges

Good Morning Milly,

I am writing on behalf of Ideal Homes, a long-established independent estate agency based in Torpoint, to express our concerns regarding the effect that the current Community Infrastructure Levy (CIL) charging structure is having on residential development within Torpoint and the Rame Peninsula.

As estate agents working in the local market every day, we have first-hand knowledge of the continued demand for housing across Torpoint, Millbrook and the Rame Peninsula. Whilst the property market has inevitably become more price-sensitive over the past 18 months due to higher interest rates and wider economic uncertainty, demand for well-designed, sensibly priced homes remains consistently strong.

One of the greatest challenges we face is not a lack of buyers—it is a lack of available housing.

We regularly speak with first-time buyers, growing families and those relocating from Plymouth who are unable to find suitable homes because there is simply insufficient supply. Torpoint continues to offer an attractive and more affordable alternative to Plymouth, with excellent transport links and a strong sense of community. However, unless more homes are built, this opportunity will be lost.

We recognise and support the principle behind Community Infrastructure Levy. It is entirely reasonable that new development should contribute towards the infrastructure required to support growing communities, including schools, healthcare, public open spaces, and transport improvements.

However, there is little benefit in imposing charges that prevent developments from coming forward in the first place.

The cumulative effect of CIL, Section 106 obligations, increasing construction costs and wider economic pressures is making many otherwise viable schemes financially unworkable. We have spoken with several local developers who are becoming increasingly reluctant to pursue opportunities within Torpoint because the financial risk is simply too great.

A temporary pause in CIL charges could make a significant difference.

We would encourage Cornwall Council to consider introducing a CIL moratorium for residential development within Torpoint. Such an initiative would provide developers with the confidence to bring forward schemes that are currently being delayed or abandoned, allowing planning applications to progress and construction to commence.

There is clear evidence that reducing barriers to development encourages investment. Similar initiatives elsewhere, including CIL-free zones and planning reforms designed to stimulate regeneration, have demonstrated how quickly developers respond when viability improves.

A temporary CIL break would not represent a loss of opportunity—it would be an investment in Torpoint's future.

Increasing the supply of new homes would help address the area's housing shortage, provide opportunities for local people to remain within the community, support first-time buyers, and create employment throughout the construction industry. In the longer term, it would also generate increased council tax revenue, strengthen the local economy, and support the town's shops, schools, and local services.

From our position within the local property market, we firmly believe that demand exists to support additional development. Even in today's more challenging market, quality homes that are correctly priced continue to generate significant interest and achieve successful sales. The appetite is there; what is lacking is the volume of new housing being delivered.

Torpoint has enormous potential. Rather than being viewed simply as a gateway into Cornwall, it should be recognised as a thriving coastal town where people actively choose to live, work and invest. Encouraging residential development is one of the most effective ways of achieving that ambition.

We hope the Council will give serious consideration to introducing a temporary CIL moratorium to stimulate development and unlock much-needed housing delivery. We would welcome the opportunity to discuss our experiences of the local market and contribute to any future conversations regarding housing and regeneration within Torpoint.

Thank you for taking the time to consider our views.

Yours faithfully,

ideal property Group
Stuart Nicholls
Director
Tel: 01752 812333
Mob: 07977472799
Email: stuart@idealhomes-sw.co.uk

Milly Southworth

From:	Huggins Marine <office@hugginsmarine.com>
Sent:	21 July 2026 12:08
To:	catherine.thomson@cornwall.gov.uk
Cc:	clerk@torpointtowncouncil.gov.uk; tremayne@antonyestate.com
Subject:	CIL Tax Levey On Torpoint

Dear Catherine,

Further to our ongoing discussions with Torpoint Town Council regarding the Community Infrastructure Levy (CIL) on new residential developments within Torpoint, I am writing directly in response to the email from Gemma Arthur, Infrastructure Group Leader, which you subsequently forwarded to Milly at Torpoint Town Council. Gemma's email was itself a response to my original correspondence sent to Torpoint Town Council on 3 June 2026.

In her email, Gemma states that the "short answer" to whether the CIL charge can be changed is **"No."** I found this response disappointing, particularly as it appears to have been reached without fully investigating or understanding the unique circumstances facing Torpoint.

Gemma also requests evidence that the CIL levy is preventing development and states that she has no record of developers contacting her to raise concerns. I believe I am in a strong position to provide that evidence.

The fundamental issue is that developers are simply **not considering Torpoint** because the CIL levy, combined with current market conditions, has made development financially unviable. The absence of enquiries should not be interpreted as evidence that there is no problem. On the contrary, it demonstrates that developers have already discounted Torpoint as a viable investment opportunity.

Despite Torpoint having one of the lowest CIL rates in Cornwall, virtually no new residential developments are progressing through the planning system. This alone should indicate that something is fundamentally wrong.

Torpoint should be thriving and helping Cornwall meet its Government housing targets. Instead, it remains one of the most deprived towns in Cornwall, with an ageing housing stock that is increasingly unsuitable for modern living. The value of existing housing also suppresses new-build values, making it difficult for developers to recover ever-increasing construction costs.

When the CIL levy was introduced in 2019, labour and material costs were significantly lower, finance costs were more favourable, and developments remained commercially viable. Since then, construction costs have increased dramatically, borrowing costs have risen substantially, and inflation has eroded developer margins. While these costs have increased, the CIL levy has remained unchanged, removing what little profit remains and making many schemes impossible to deliver.

Below are examples of developments that have either been shelved, redesigned or withdrawn directly because of the financial impact of the CIL levy.

Huggins Bros Marina Group Sites

The Gardens, Antony Road

- Original scheme for 26 apartments with road-frontage commercial units and new public toilets.

- Although the CIL liability was only approximately £3,000, rising construction costs have rendered the scheme unviable.
- The fully consented site has been marketed at an attractive price, with planning implemented and ready to commence, yet there has been no interest from external developers.
- We have therefore been forced to redesign the scheme to provide five townhouses and six flats for the rental market, together with the public toilets.
- However, submitting a new planning application would trigger a revised CIL liability that would again make the project marginal and too risky to proceed.

Result: 11 much-needed homes lost.

Harbour Lights, Fore Street

- Existing implemented planning permission for 12 waterfront apartments, commercial space and 10 flats at Fore Street level.
- Current build costs now make the approved scheme unviable
- Alternative proposals for a terrace of five homes have been prepared but have not been submitted because of the CIL implications.
- The site remains vacant and detracts from the town centre.

Result: 5 homes lost.

Carew Wharf, Marine Drive

- Planning permission for three x three-bedroom maisonettes elapsed.
- Renewal application withdrawn from submission in January this year because the CIL levy made the development financially unviable.

Result: 3 homes lost.

Carbeile Wharf Boatyard & Marina Redevelopment

- Comprehensive regeneration scheme including a new marina office, café, shower facilities, public amenities and a 40-apartment development.
- The proposals were presented by the architects to Torpoint Town Council and received support before progressing to pre-application discussions.
- The entire project was subsequently shelved because the CIL levy made it financially impossible.

Result: 40 homes lost, together with significant investment, employment opportunities and regeneration of the marine sector.

Discovery Court

- Redevelopment of the former NHS building and ambulance station for 36 residential units.
- Scheme shelved directly because the CIL levy rendered it unviable.

Result: 36 homes lost.

In total, these examples represent **95 desperately needed homes** that have not progressed purely because the current CIL levy has made them financially unviable. With a immediate loss approx £250k council tax revenue per year for eternity!

These are all brownfield sites that should be contributing towards Torpoint's regeneration rather than remaining vacant. Torpoint urgently needs either a temporary exemption from the CIL levy or a significantly reduced rate, together with regeneration incentives from Cornwall Council, to stimulate investment and unlock housing delivery.

Such a policy would not only bring forward these stalled brownfield developments but would also encourage major housebuilders to invest in larger allocated sites, including the former rugby field and other Anthony Estates land, bringing wider economic benefits, employment opportunities and increased confidence in the town.

The current situation benefits nobody. While Torpoint Town Council is entitled to receive 25% of CIL receipts, **25% of nothing is still nothing**. A reduced or temporary exemption that enables development to proceed would generate new homes, employment, council tax income and wider economic growth, rather than leaving sites dormant indefinitely around the town.

I also find it concerning that this body of evidence has apparently not come to the attention of the Infrastructure Group, Planning Service or Housing Service. The impact of the current CIL policy is already clearly visible throughout Torpoint.

I hope that, having considered the evidence above, Cornwall Council will review its current position and recognise that a more flexible approach is essential if Torpoint is to regenerate, attract investment and deliver the housing it so desperately needs.

I look forward to hearing your comments and sincerely hope that common sense will prevail.

Yours sincerely,

Shaun Huggins

--
Kind Regards
Shaun Huggins
Huggins Bros Marina Group
Mill Lane
Torpoint
Cornwall
01752 813201
PL112RE

Milly Southworth

From:	Gemma Arthur <Gemma.Arthur@cornwall.gov.uk>
Sent:	21 July 2026 13:00
To:	steverickhards@gmail.com
Cc:	Catherine Thomson; clerk
Subject:	FW: C.I.L. CHARGES AND DEVELOPMENT IN TORPOINT
Attachments:	letter to the Town Clerk - Torpoint Council RE C.I.L^L.DOCX; Housing Viability Guidance Note (Part A) - Appendix 1.pdf

Information Classification: CONTROLLED

Dear Steve

Thank you for copying the CIL team in on your email to Torpoint Town Council. Torpoint Town Council are not responsible for administering any part of the Community Infrastructure Levy (CIL), so I appreciate the opportunity to be able to address the issues you have raised.

CIL is not negotiable but s106 contributions are. If there are developments which can demonstrate viability issues as a result of developer contributions, this should be raised through the usual planning routes. I have checked with the Planning Group Leader who covers Torpoint and they were not aware of any specific issues, so would suggest developers raise viability concerns with their Planning Officers during s106 negotiations in the first instance.

Cornwall Council does offer CIL Exceptional Circumstances relief, which can be claimed by any development which is liable for a CIL charge but which has not commenced and has a s106 agreement requiring contributions to be made. Information about this is published on our website at Available CIL relief - Cornwall Council. The criteria for claiming this relief is set out in the CIL Regulations 2010 (as amended) and includes submission of an independently produced viability assessment report (the author of which has to be pre-approved by the CIL Charging Authority). This is a discretionary relief which not many other CIL Charging Authorities offer. There is a fee for applying for the relief, but any developer wishing to enquire about this relief should contact us at cil@cornwall.gov.uk.

Cornwall Council is aware of some developments experiencing viability issues due to current housing market conditions, and we commissioned a study to investigate. This included consultation with the development industry to help ensure the assessment work was relevant to building in Cornwall, and to understand how viability challenges could be mitigated. The results of the study concluded that some developments are experiencing viability issues in housing value (affordability) zone 4 and 5 – which, as you will be aware, includes Torpoint and Millbrook. As such, the Council is in the process of introducing some temporary measures to ease current pressures.

The first set of measures was approved on 8 July and I attach a note which sets out what these are – this will be published on the Councils website within the next could of days. For information, Cllr Rob Parsonage attended the meeting where these measures were approved. Further measures are currently being considered and will be going to a Cabinet meeting in the autumn.

I hope the above and attached demonstrates Cornwall Council is taking what steps it can to help mitigate current market pressures. If you have any further general questions about CIL, please do let me know. If you have any questions about the viability of any specific developments, please contact the relevant planning team.

Kind regards
Gemma

Gemma Arthur | Strategic Manager - Infrastructure Team
Cornwall Council | Planning and Housing Service
gemma.arthur@cornwall.gov.uk | Tel: 01872 322222 *and ask for Gemma Arthur*

Milly Southworth

From:	Gemma Arthur <Gemma.Arthur@cornwall.gov.uk> on behalf of CIL Enquiries <cil@cornwall.gov.uk>
Sent:	21 July 2026 13:09
To:	stuart@idealhomes-sw.co.uk
Cc:	clerk; Catherine Thomson; Julie Martin; Gary Davis
Subject:	RE: CIL Charges
Attachments:	Housing Viability Guidance Note (Part A) - Appendix 1.pdf

Information Classification: CONTROLLED

Dear Stuart

Further to your email below, this has been forwarded to me as Torpoint Town Council are not responsible for administering any part of the Community Infrastructure Levy (CIL), so I appreciate the opportunity to be able to address the issues you have raised.

CIL is not negotiable but s106 contributions are. If there are developments which can demonstrate viability issues as a result of developer contributions, this should be raised through the usual planning routes. I have checked with the Planning Group Leader who covers Torpoint and they were not aware of any issues with specific developments or proposals in the area.

Cornwall Council offers CIL Exceptional Circumstances relief, which can be claimed by any development which is liable for a CIL charge but which has not commenced and has a s106 agreement requiring contributions to be made. Information on this is available on the Council's website and developers can contact the CIL team to enquire about this relief.

Cornwall Council is aware of some developments experiencing viability issues due to current housing market conditions, and we commissioned a study to investigate. This included consultation with the development industry to help ensure the assessment work was relevant to building in Cornwall, and to understand how viability challenges could be mitigated. The results of the study concluded that some developments are experiencing viability issues in housing value (affordability) zone 4 and 5 – which includes Torpoint and Millbrook. As such, the Council is in the process of introducing some temporary measures to ease current pressures.

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I hope the above and attached demonstrates Cornwall Council is taking what steps it can to help mitigate current market pressures. If you have any further general questions about CIL, please do let me know.

Kind regards
Gemma

Gemma Arthur | Strategic Manager - Infrastructure Team
Cornwall Council | Planning and Housing Service
cil@cornwall.gov.uk | Tel: 01872 322222 *and ask for Gemma Arthur*

Please note my working hours are 7am to 3pm, Monday to Friday.

Milly Southworth

From:	Gemma Arthur <Gemma.Arthur@cornwall.gov.uk> on behalf of CIL Enquiries <cil@cornwall.gov.uk>
Sent:	21 July 2026 14:17
To:	office@hugginsmarine.com
Cc:	Catherine Thomson; clerk
Subject:	RE: CIL Tax Levey On Torpoint
Attachments:	Housing Viability Guidance Note (Part A) - Appendix 1.pdf

Information Classification: CONTROLLED

Dear Shaun

Thank you for your email about this matter. I have included below the same response I have just sent to Steve Rickhards, who I am aware from our monitoring system you use as your architect. This sets out that Cornwall Council is aware that some developments in some areas are experiencing viability issues due to current market conditions, and the steps that are within the Councils power to take towards mitigating viability pressures.

CIL is not negotiable but s106 contributions are. If there are developments which can demonstrate viability issues as a result of developer contributions, this should be raised through the usual planning routes. I have checked with the Planning Group Leader who covers Torpoint and they were not aware of any specific issues, so would suggest developers raise viability concerns with their Planning Officers during s106 negotiations in the first instance.

Cornwall Council does offer CIL Exceptional Circumstances relief, which can be claimed by any development which is liable for a CIL charge but which has not commenced and has a s106 agreement requiring contributions to be made. Information about this is published on our website at Available CIL relief - Cornwall Council. The criteria for claiming this relief is set out in the CIL Regulations 2010 (as amended) and includes submission of an independently produced viability assessment report (the author of which has to be pre-approved by the CIL Charging Authority). This is a discretionary relief which not many other CIL Charging Authorities offer. There is a fee for applying for the relief, but any developer wishing to enquire about this relief should contact us at cil@cornwall.gov.uk.

Cornwall Council is aware of some developments experiencing viability issues due to current housing market conditions, and we commissioned a study to investigate. This included consultation with the development industry to help ensure the assessment work was relevant to building in Cornwall, and to understand how viability challenges could be mitigated. The results of the study concluded that some developments are experiencing viability issues in housing value (affordability) zone 4 and 5 – which, as you will be aware, includes Torpoint and Millbrook. As such, the Council is in the process of introducing some temporary measures to ease current pressures.

The first set of measures was approved on 8 July and I attach a note which sets out what these are – this will be published on the Councils website within the next could of days. For information, Cllr Rob Parsonage attended the meeting where these measures were approved. Further measures are currently being considered and will be going to a Cabinet meeting in the autumn.

I hope the above and attached demonstrates Cornwall Council is taking what steps it can to help mitigate current market pressures. If you have any further general questions about CIL, please do let me know. If you have any questions about the viability of any specific developments, please contact the relevant planning team.

Kind regards
Gemma

Gemma Arthur | Strategic Manager - Infrastructure Team
Cornwall Council | Planning and Housing Service

Housing Viability Guidance Note:
Time limited amendments to the implementation of Cornwall Local Plan Policies (Part A)

Guidance Note

Cornwall Council has been consulting on guidance relating to housing, which is set out in the 'Housing for All' Chief Planning Officer Advice Note; with part of that work focusing on evaluating deliverability. With that in mind we have undertaken a specific review of the viability of building housing in Cornwall, which was undertaken with the support of viability consultants Three Dragons and engagement with the development industry. This work assessed the current position across the five Value Zones set out within the Cornwall Local Plan.

It is recognised that the current economic climate, relating to interest rates; build cost inflation outpacing sales growth; etc, has created a challenging situation to be delivering housing in certain parts of Cornwall. In particular, the review highlighted that in Value Zones 4 and 5, where sales and rental values are lower, the position has become particularly problematic at the current time. (Appendix 1 lists the parishes within Value Zones 4 and 5)

In recognition of the current economic conditions, Cornwall Council is looking to put in place a series of time-limited adjustments to how existing policies are implemented for new applications within Value Zones 4 and 5. These measures do not amend the adopted policies themselves, instead modify the Council's approach to applying them in practice, to help address viability challenges for residential development in these areas.

The first set of modifications are summarised in Table 1 and explained in more detail in the accompanying notes[1].

***Table 1**: Time Limited amendments to the implementation of development plan policies for new residential applications*

	Minor Development (1-9 dwellings, and site area under 0.5ha)	**Major Development** (10 or more dwellings, or a site area of 0.5ha or more)
Value Zone 1-3 Parishes	• Revised CIL Instalment policy *(Note 1)*	• Revised CIL Instalment policy *(Note 1)*
Value Zone 4 Parishes	• Revised CIL Instalment policy *(Note 1)* • Revised payment triggers for off-site s106 contributions *(Note 2)*	• Revised CIL Instalment policy *(Note 1)* • Revised payment triggers for off-site s106 contributions *(Note 2)* • Revised triggers for the delivery of affordable housing *(Note 3)*
Value Zone 5 Parishes	• Revised CIL Instalment policy *(Note 1)* • Revised payment triggers for off-site s106 contributions *(Note 2)*	• Revised CIL Instalment policy *(Note 1)* • Revised payment triggers for off-site s106 contributions *(Note 2)* • Revised triggers for the delivery of affordable housing *(Note 3)* • No requirement to provide off-site Public Open Space contribution *(Note 4)*

1 The intention is to implement further modifications in the coming months, which will also be focused on parishes within Value Zones 4 and 5. Once endorsed, these additional measures will be featured in an updated version of this note

Notes associated with Table 1:

1. **Revised CIL** Instalment Policy – A new Instalment Policy has been put in place which will apply to all developments that commence from 1 April 2026, across all Value Zones. This updated Policy can be viewed in Appendix 2. More information on CIL can be found at www.cornwall.gov.uk/cil
2. **Timing of off-site s106 contributions** – For new residential applications within Value Zone 4 and 5 parishes, the timing of off-site s106 contribution payments will be extended. The revised timings are:
   - No more than 50% of the dwellings to be occupied, before 50% of the off-site s106 contributions are paid
   - No more than 75% of the dwellings to be occupied, before all remaining off-site s106 contributions are paid
3. **Timing of affordable housing delivery** – For new applications within Value Zone 4 and 5 parishes, the timing of the delivery of affordable housing will be extended. The revised timescales are:
   - No more than 50% of the open market dwellings to be occupied, before 50% of the affordable dwellings are available for occupation and have been transferred to a Registered Provider or in the case of Discount Market Sale are available for occupation
   - No more than 75% of the open market dwellings to be occupied, before all remaining affordable dwellings are available for occupation and have been transferred to a Registered Provider or in the case of Discount Market Sale are available for occupation
4. **Off-site Public Open Space (POS) Contributions** – The requirement to provide an off-site Public Open Space (POS) contribution will be excluded from new s106 agreements for residential schemes located in Value Zone 5 parishes. On-site provision will still be required where this is necessary to make the development acceptable.

   In order to make up the anticipated loss in s106 funding for potential POS projects in these areas, £300,000 will be allocated annually from the Community Infrastructure Levy Strategic Share for such projects in Value Zone 5 parishes specifically, which mirrors historic rates of s106 contributions secured. This allocation will run for the same period as the temporary suspension of the off-site POS contributions. The distribution of this ringfenced money will be managed through a light touch application process.

Reviewing this temporary policy position

The amendments to the implementation of these policies represent time limited interventions, reflecting current market conditions. Through the engagement with local developers it was felt that market conditions should improve, so the Council will continue to monitor key indicators, such as sales and rental values, BCIS build rates, interest rates etc; as well as evidence from schemes being delivered. The position will be reviewed annually and the Council will withdraw these time limited policy amendments, as soon as market conditions permit.

Economic (Financial) Viability Assessments (EVA)

The temporary policy measures set out in Table 1, can be utilised **without** the need to go through a review of the scheme's EVA with Cornwall Council.

In the event that a scheme still remains unviable, following the implementation of these temporary policy measures, applicants can seek to enter into dialogue with Cornwall Council on the viability of their scheme in the normal format, as set out within the *Homes for All Chief Planning Officer's Advice Note*.

Where the review of the EVA results in a renegotiation of a scheme's affordable housing provision, a Section 73 application will be required. Furthermore, where subsidy is going to be introduced to enable the delivery of some or all of the affordable housing, the RP partner must be included in finalising the Agreement to ensure compliance with HE capital funding requirements and their internal Business Plan / policy assumptions, but will not be party to the new s106.

Appendix 1 – Communities / Parishes within Value Zones 4 and 5

Value Zone	Target levels of affordable housing (policy 8)	Towns in policy 3	Other settlements	Parishes
4	30%	Bodmin, Bude with Stratton and Poughill Callington, Camelford Hayle, Launceston, Penzance with Newlyn Heamoor, Gulval and Long Rock. Saltash, Wadebridge Torpoint	Boscastle, , Gunnislake, , Kilkhampton, Looe, Mullion, Perranporth, Porthleven St Agnes, St Blazey/Par, St. Columb Major, St Just, Tintagel	Advent CP; Altarnun CP; Bodmin CP; Botusfleming CP; Breage CP; Bude-Stratton CP; Callington CP; Calstock CP; Camelford CP; Colan CP; Cubert CP; Cury CP; Davidstow CP; Deviock CP; Duloe CP; Egloshayle CP; Egloskerry CP; Forrabury and Minster CP; Germoe CP; Grade-Ruan CP; Gunwalloe CP; Gweek CP; Gwennap CP; Gwinear-Gwithian CP; Hayle CP; Kilkhampton CP; Ladock CP; Landewednack; Landrake with St. Erney CP; Laneast CP; Lanreath CP;Lansallos CP; Launceston CP; Lewannick CP Lezant CP; Looe CP; Ludgvan CP; Luxulyan CP; Mabe CP; Madron CP; Marhamchurch ; Mawgan-in-Meneage CP; Michaelstow CP; Millbrook CP; Morval CP; Mullion CP; North Hill CP; North Petherwin; Otterham CP; Penzance CP; Perranuthnoe CP; Perranzabuloe CP; Porthleven CP Portreath CP; Probus CP; Quethiock CP; Saltash CP; Sithney CP; St. Agnes CP ; St. Blaise CP; St. Breock CP; St. Breward CP; St. Buryan CP; St. Clether CP; St. Columb Major; St. Erme CP; St. Ervan CP; St. Gennys CP; St. Gluvias CP; St. Issey CP; St. Ive CP; St. John CP; St. Juliot CP; St. Just CP; St. Keverne CP; St. Kew CP; St. Mabyn CP; St. Martin-in-Meneage CP; St. Mewan CP; St. Neot CP; St. Newlyn East; St. Stephens By Launceston Rural; St. Tudy CP; Stithians CP; Tintagel CP; Torpoint CP; Tremaine CP; Tywardreath and Par CP; Wadebridge CP Warleggan CP; Week St. Mary; Wendron CP; Werrington CP; Whitstone CP
5	25%	Camborne with Pool, Illogan and Redruth, Helston, Liskeard St Austell	Indian Queens with St Columb Rd & Fraddon, Delabole	Camborne CP; Carharrack CP; Carn Brea CP; Crowan CP; Dobwalls and Trewidland CP; Helston CP; Illogan CP; Lanner CP; Lawhitton Rural; Lesnewth CP; Liskeard CP; Menheniot CP; Pelynt CP; Redruth CP; Roche CP; South Petherwin; St. Austell CP; St. Cleer CP; St. Day CP; St. Dennis CP; St. Enoder CP; St. Erth CP; St. Eval CP; St. Keyne CP; St. Martin-by-Looe CP; St. Michael Caerhays CP; St. Pinnock CP; St. Stephen-in-Brannel CP; St. Teath CP; St. Thomas the Apostle Rural CP; Tresmeer CP; Trevalga CP; Treverbyn CP; Warbstow CP

Notes:

- *This represents an extract from the Cornwall Local Plan Strategic Policies document.*
- *Policy 3 and Policy 8 referenced in the table above refer to policies from the Local Plan Strategic Policies document*
- *Since its publication St Gluvias Parish is now called Ponsanooth Parish; and Delabole is a new parish that has been categorised as being within Value Zone 5*

Appendix 2 – Revised CIL Instalment Policy

CORNWALL COUNCIL
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Community Infrastructure Levy
Instalment Policy

This policy takes effect from 1 April 2026 and will be applied to all new Demand Notices generated after this date.

In accordance with Regulation 69B of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended), Cornwall Council will allow the payment of CIL by instalments. The instalments permitted will be linked to the amount payable (the chargeable amount) as recorded on the Demand Notice, and set out in the table below.

The Commencement Date is the date as advised by the developer on the Commencement Notice, as required under CIL Regulation 67.

Phased development

As permitted under Regulation 9(4) of the CIL Regulations 2010 (as amended), where outline planning permission which permits development to be implemented in phases has been granted, each phase of the development as agreed by Cornwall Council, is a separate chargeable development and the instalment policy will, therefore, apply to each separate chargeable development and associated separate liable amount chargeable.

Where the Instalment Policy will not apply

This Instalment Policy will not apply if any one of the following circumstances arise:

i. A CIL Commencement Notice has not been submitted prior to commencement of the chargeable development.
ii. No one has assumed liability to pay CIL in respect of the chargeable development prior to commencement.
iii. A person has failed to notify Cornwall Council of a disqualifying event within 14 days of a disqualifying event occurring (a disqualifying event relating to a change in circumstances subsequent to CIL relief being granted).

When the Instalment Policy ceases to apply, any remaining chargeable amount will become due for payment immediately.

Surcharges will also be applied for failure to submit the Assumption of Liability form or Commencement Notice before the development commences.

Further information about CIL is available on the Council's website at www.cornwall.gov.uk/cil.

Total CIL Liability	*Number of Instalments*	*Amount payable (%)*	*Due after commencement date (days)*
Equal to or less than £4,999	1	100	90
£5,000 – £19,999	2	50 50	90 180
£20,000 – £49,999	2	50 50	180 360
£50,000 – £99,999	3	30 40 30	180 360 540
£100,000 – £249,999[a]	3	25 40 35	180 360 540
£250,000 – £499,999[a]	3	25 40 35	270 360 540
£500,000+ [ab]	4	25 25 25 25	270 360 540 720

[a] *Any remaining balance will be due immediately if development completes before the due instalment date(s) set out.*

[b] *Instalments for developments with a total CIL liability over £1m will be open for negotiation on an individual basis prior to commencement.*

Contact Cornwall Council Planning Service planning@cornwall.gov.uk 0300 1234 151

Milly Southworth

From: Huggins Marine <office@hugginsmarine.com>
Sent: 27 July 2026 09:00
To: gemma.arthur@cornwall.gov
Cc: catherine.thomson@cornwall.gov.uk; phil.mason@cornwall.gov.uk; tremayne@antonyestate.com; clerk@torpointtowncouncil.gov.uk; steverick >> Steve RICKHARDS; Stuart Nicholls

Subject: CIL LEVY TORPOINT TOWN ZONES 4 AND 5

Dear Gemma,

Thank you for your prompt response.

I must admit that I, together with local architects, developers and estate agents who have contributed evidence to Cornwall Council, are disappointed by the speed of your generated reply to us all. It gives the impression that the evidence submitted has not been fully considered, as many of the specific points raised have not been addressed.

Our concern is that this matter is being viewed purely through policy rather than through the reality on the ground. Torpoint is facing significant economic challenges, a shortage of viable housing development, declining investment and struggling businesses. We had hoped that the evidence presented would encourage Cornwall Council to reconsider its position in light of these circumstances.

The Community Infrastructure Levy guidance is a particularly complex piece of legislation. However, I am puzzled by what appears to be a contradiction in your correspondence. In previous emails you stated that Cornwall Council had no evidence that the CIL levy was creating issues in Torpoint. In your latest response, however, you acknowledge that the Council has been aware for some considerable time of development viability concerns within Zones 4 and 5, to the extent that specialist viability studies were commissioned.

This raises an important question. If Cornwall Council has known for several years that viability issues existed, what practical steps has it taken to mitigate those issues and support housing delivery and economic growth within Torpoint? Your response does not demonstrate that any meaningful action has been taken.

Could you also clarify whether officers from Cornwall Council's Infrastructure, CIL, Planning or Housing departments have, in their official capacity, visited Torpoint to assess the town first-hand? There is considerable value in understanding the local situation by walking through the town, meeting local businesses and speaking with Town Councillors, rather than relying solely on reports, statistics and policy documents from Cornwall council offices.

I would also appreciate clarification on another important point. Plymouth City Council has introduced a zero-rate CIL charge (£0 per square metre) across areas including the City Centre, Millbay and Sutton Harbour. This appears to contradict the position you have outlined. Steve Rickards, an architect with many decades of experience working on developments throughout Plymouth, raised this issue in his correspondence, yet your response does not address the points he made.

As I understand it, the introduction of CIL was never mandatory. Each charging authority made its own decision as to whether to adopt it and, importantly, what charging rates should apply across different areas. Authorities also retain the power to apply a zero-rate where this is justified by local circumstances which Torpoint clearly is.

The Community Infrastructure Levy Regulations 2014 require charging authorities to strike an appropriate balance between funding infrastructure and ensuring that development across their area remains economically viable. The purpose of the levy is not simply to generate income, but to support sustainable development and the implementation of the Local Plan.Furthermore the planning act 2008 GUIDANCE states whilst the charging authority can make CIL charges the rate should not deter viability of developments! Clearly this has been against government Guidance for Torpoint for several years.whilst Cornwall council may not be considered to zero rate CIL at the very least for a set period you definitely have the discretion to significantly reduce the CIL charge for helping the viability of developments in a struggling town under Cornwall council control.

It is difficult to conclude that this balance has been achieved in Torpoint. The evidence supplied by architects, developers, estate agents and local property professionals demonstrates that the current CIL rates have adversely affected the viability of residential development within Torpoint and neighbouring areas in Zones 4 and 5. If Cornwall Council believes the current charging schedule remains justified, could you please provide the evidence upon which this conclusion is based?

There is one further strategic consideration which I believe Cornwall Council has failed to properly acknowledge.

The Government has committed billions of pounds of investment into HM Naval Base Devonport and the wider defence sector. This investment is expected to create thousands of highly skilled jobs over the coming years, together with a substantial increase in demand for housing, transport infrastructure and supporting services across the wider Plymouth travel-to-work area.

Cornwall Council is fully aware of this opportunity. It has joined with Plymouth City Council, Devon County Council and Torbay Council in recognising the need for a coordinated, cross-boundary approach to planning and housing delivery to maximise the benefits of this investment.

Given Torpoint's unique geographical position immediately adjoining Plymouth and connected by the Torpoint Ferry, our town is ideally placed to accommodate a proportion of this future housing demand. Many existing dockyard and defence employees already choose to live in South East Cornwall because of its location and quality of life. That demand is only likely to increase as Devonport expands.

Rather than encouraging sustainable residential development in Torpoint, however, the current CIL charging regime appears to discourage it. This seems entirely contrary to both local and national planning objectives. At a time when Government is investing billions into the regional economy and local authorities are working together to plan for future growth, Cornwall Council's continued application of a CIL rate that undermines residential viability risks preventing the very housing that will be required to support that growth.

I therefore ask Cornwall Council to explain how maintaining the current CIL rate in Torpoint aligns with its commitments to regional collaboration, economic growth and housing delivery. If Cornwall Council accepts that significant additional housing will be required to support the expansion of Devonport and the wider defence sector, why is it continuing to apply a charging schedule that independent professionals have demonstrated is making residential development in Torpoint increasingly unviable?

The fundamental issue is this: a development that does not proceed generates no affordable housing, no infrastructure contributions, no employment and no economic growth. A CIL charge that renders schemes financially unviable raises no revenue at all. Put simply, 25% of nothing is still nothing.

I would also be grateful if you could confirm whether Cornwall Council's proposed residential development on the former Torpoint Police Station site will itself be liable for the full CIL charge in exactly the same way as any private developer. It is important that all parties operate on a genuinely level playing field.

This is not simply a debate about CIL. It is about whether Cornwall Council is prepared to seize what may be the greatest economic opportunity the Tamar region has seen for decades. Torpoint should be part of the solution to meeting future housing demand arising from the expansion of Devonport, not held back by a charging regime that has already been shown to undermine development viability.

Whilst I do not intend to enter into prolonged correspondence, I feel strongly that Torpoint has been let down for many years. The effects are visible to anyone who spends time in the town. We have vacant sites that remain undeveloped, businesses struggling to survive, insufficient housing delivery and opportunities being lost. These are not theoretical issues—they affect residents every day.

I hope Cornwall Council welcomes constructive criticism and will genuinely reflect on the evidence that has been presented. Rather than relying solely on policy interpretation, I would encourage officers to visit Torpoint, meet with Town Councillors, local businesses, developers and residents, and see first-hand the challenges—and opportunities—that exist.

I, local professionals and all town councillors look forward to receiving your more detailed response on all points raised.

Yours sincerely,

Shaun Huggins

Director Huggins Bros Marina And Property Development Group.

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Kind Regards
Shaun Huggins
Huggins Bros Marina Group
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Torpoint
Cornwall
01752 813201
PL112RE

Milly Southworth

From:	Gemma Arthur <Gemma.Arthur@cornwall.gov.uk>
Sent:	04 August 2026 10:33
To:	Huggins Marine
Cc:	Catherine Thomson; clerk; steverickhards@gmail.com; stuart@idealhomes-sw.co.uk
Subject:	RE: CIL LEVY TORPOINT TOWN ZONES 4 AND 5
Attachments:	Housing Viability Guidance Note (Part A) - Appendix 1.pdf

Information Classification: CONTROLLED

Dear Shaun

I can respond on the points you raise about CIL and, to some degree, viability, but any wider issues around what Plymouth City Council have done (which is a separate authority and has a different development landscape), developments at Devonport, and wider concerns about Torpoint town centre, are beyond my knowledge and remit, so would encourage you to raise these issues through other channels – possibly starting with your local Cornwall Councillor, Rob Parsonage.

Regarding CIL, I acknowledge the concerns you are raising about viability within Torpoint. The process for setting and changing CIL rates is set out in the CIL Regulations – it is not a process that Cornwall Council has created. There is a very specific, and quite extensive process for setting and gaining approval for CIL charges, which includes submission to the Secretary of State and an Examination in Public. It is not possible to review and change a CIL rate for one area. The Council would have to undertake a review of the CIL charges across the whole of Cornwall. In order to do this, we need an up-to-date Local Plan and to understand the infrastructure needs to support development as set out in that Local Plan. This then provides part of the evidence base for charging (or not charging) CIL. As you will be aware, the Council is currently in the process of updating its Local Plan and, alongside it, we are developing an Infrastructure Delivery Plan. Once this is complete, we will be in a position to review the CIL charges across the whole of Cornwall.

For clarification, any development that is generating new floorspace is within the scope of CIL, regardless of who the developer is.

I have previously brought your attention to the fact that we offer a number of exemptions and relief that can be claimed where the requirements set out in the CIL Regulations can be met – this includes all discretionary as well as mandatory relief.

On the point of viability specifically, CIL is one of many costs of development and is a known cost – we have been charging CIL in Cornwall since 2019. The Council does not have control over external factors that may be impacting overall development costs. As previously outlined, the Council is in the process of taking what steps are within its power now, to help alleviate the current pressure that some developments are experiencing. This is set out in the attached note, as previously provided, which is now available on the Councils website. The development industry was engaged in this work. Any viability issues being experienced by individual developments, need to be raised through the planning process.

Kind regards
Gemma

Gemma Arthur | Strategic Manager - Infrastructure Team
Cornwall Council | Planning and Housing Service
gemma.arthur@cornwall.gov.uk | Tel: 01872 322222 *and ask for Gemma Arthur*

Please note my working hours are 7am to 3pm, Monday to Friday.