

## SUMMARY OF RESPONSES TO CIL CONSULTATION

Number	Respondent	Summary of Response	Council Response
CIL001	Alresford Parish Council (Tendring DC)	Note requirement for involvement of Parish Councils with major applications	Noted
CIL002	Feering Parish Council (Braintree DC)	<ol style="list-style-type: none"> <li>1. CIL should fund A12 improvements</li> <li>2. Measures to ensure payment of contributions required as well as review levels</li> <li>3. More attention to rural areas needed</li> <li>4. Occupants of social housing will need infrastructure, but not subject to CIL</li> </ol>	<ol style="list-style-type: none"> <li>1. Priorities for funding will be agreed through development of a list (Regulation 123 list) approved by the Council</li> <li>2. Noted – publication of the draft Charging Schedule will include further detail on payment requirements and review mechanisms.</li> <li>3. The Evidence Base study notes that the base level scheme uses a large residential site on the outskirts of the Colchester urban area because this is where the critical mass of new housing is planned. While housebuilders will incur higher building costs on smaller rural sites, they will usually be spared the higher burden of providing extensive on site infrastructure and open space cost requirements. The volume of anticipated development on smaller rural sites will not be critical to achieving the overall planned number of houses and did not warrant the additional complexity of a differentiated charge in the CIL.</li> <li>4. This is set by national regulations/outside the scope of CBC work</li> </ol>
CIL003	Office for Nuclear Regulation	No comments	NA

CIL004	Tiptree Parish Council	<p>1. Document poorly written and its intentions are unclear.</p> <p>2. Any monies gained for infrastructure should be used within the ward where the development is taking place and not made available to other areas of the borough.</p>	<p>1. Noted.</p> <p>2. Development has implications for increasing pressure on both local and strategic development and funding needs to be allocated accordingly. Clarification from Government is awaited on appropriate proportions for the neighbourhood element of CIL.</p>
CIL005	Jan Plummer	Environmentally sustainable projects should be exempt	Noted. The Council will seek to encourage environmentally sustainable projects as a minimum requirement rather than as an exception but this will not affect the charge.
CIL006	Eastern Region Country Land and Business Association	<p>1. One new rural dwelling should be exempt.</p> <p>2. Rural shops should be given separate consideration based on viability.</p>	The policies for charging and exemptions are set by national legislation/regulations.
CIL007	English Heritage	No comments other than to hope that funding by CIL will include enhancing the Borough's historic assets.	Noted
CIL008	Sport England	<p>1. Information on how the costs of sports facility projects were calculated should be provided and checked with Sports England methodology.</p> <p>2. Support not applying the levy to leisure/sports centres</p>	Noted
CIL009	Brian Morgan, Architecture and Design Partnership (ADP)	<p>1. The necessary projects in the CIL evidence base infrastructure schedule cannot be delivered within the plan period. The estimates of infrastructure requirements are unreliable because they change over time. Developers will be</p>	<p>1. Flexibility is inbuilt in the plan making process. The Council demonstrated its ability to assess essential infrastructure requirements through the LDF process. This included mechanisms to update funding requirements as needs and funding sources change. Further refinements to the infrastructure evidence base</p>

		<p>unclear how much in total they have to pay taking into account CIL and Section 106. If infrastructure can't be delivered during plan period, than it can't be categorised as necessary. Given the high cost of the proposals, the Council will need to come up with cheaper alternatives.</p> <p>2. The list of priorities (123 list) does not involve sufficient public consultation.</p>	<p>are being undertaken. The requirement is to demonstrate a funding gap which can be met through a number of sources including CIL rather than specific requirements to demonstrate deliverability within a given time period. No evidence has been provided on specific areas of overestimating, but as noted above, further refinement of the evidence base is underway to ensure the highest possible levels of accuracy.</p> <p>2. Governance arrangements will be put in place to ensure full Council and public scrutiny of the priorities for CIL funding.</p>
CIL010	Mersea Homes	<p>1. There is a lack of an appropriate evidence base. The Council needs to carry out further work before proceeding, including revised assessments of infrastructure needs, viability assessments and an updated SHLAA.</p> <p>2. Suggested infrastructure includes existing deficiencies and is factually incorrect.</p> <p>3. Accurate information is needed on the potential number of units and actual sites that CIL will be payable on. The funding gap of over a quarter of a billion pounds cannot be correct. The headline costs of the infrastructure within the report have not been published with suitable supporting evidence.</p> <p>4. Land values are incorrect and are too low.</p>	<p>1 and 2. Further refinements to the infrastructure evidence base are being undertaken, including updating receipt of Section 106 monies. The selection of infrastructure projects is in line with Government guidance, which provides that the levy focuses on the provision of new infrastructure and should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by new development. (CIL Overview, para 9)</p> <p>3. This information will be checked before the draft charging schedule is published</p> <p>4. The land values are considered to reflect best available information at the time. The rate has been set on the basis that it needs to be robust over time, bearing in mind that 'economic circumstances and land values could change significantly during the lifetime of the charging schedule' (para 29, Charge setting and Charging Schedule Procedures)</p>

CIL011	Countryside Properties	<p>1. Lack of evidence on infrastructure planning.</p> <p>2. Assessment needed of other income sources.</p> <p>3. More information on viability assumptions needed.</p> <p>4. The effect on increased interest charges could be significant given the need for upfront CIL payments.</p>	<p>1. Evidence to back up the charging schedule needs to demonstrate that there is a funding gap, but is not expected to provide a detailed infrastructure delivery plan. Infrastructure will come forward in tandem with new development and cannot be fixed precisely until developer requirements are clear.</p> <p>2. Information on other funding sources will be provided in a general form but cannot be relied on as absolute figures. Government guidance (Charge Setting and Charging Setting Procedures para 14) notes that 'there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. The focus should be on providing evidence of an aggregate funding gap that demonstrates the need to levy CIL.'</p> <p>3. Viability assumptions will be checked in light of responses received</p> <p>4. CIL can be phased as required to deal with cash flow concerns.</p>
CIL012	Hills Building Group	<p>1. Assumptions for dwelling projections are unclear. This could mean that if units are not built, CIL will need to be increased.</p> <p>2. The principle of using a 'slush fund' of section 106 contributions is not considered acceptable.</p> <p>3. Transparency needed in developing Regulation 123 list.</p>	<p>1. CIL levels are set based on viability rather than by number of units. The infrastructure evidence base demonstrates the existence of a gap but is not intended to serve as a precise delivery schedule. The CIL charging level can be reviewed as needed to reflect changes in viability. In a volatile market, caution is required in setting overly prescriptive review time periods.</p> <p>2. The evidence base is being updated and will include a review of Sec106 requirements/contributions.</p> <p>3. Agreed. Governance arrangements will be put in</p>

		<p>4. Projects costing below £1 million have been excluded from detailed analysis, but no explanation as to the percentage of smaller developments in terms of overall levels of development. Caveating the information provided on education is not helpful – it means that evidence is not robust.</p> <p>5. Inclusion of New Homes Bonus monies required.</p> <p>6. Gross development value is overvalued, but land values are undervalued. Landowners will not want to put forward land in these circumstances.</p>	<p>place to ensure full Council and public scrutiny.</p> <p>4. The threshold of £1 million refers to infrastructure requirements rather than the size of development. Unless there is total clarity on the types of development coming forward, it is difficult to pin down exact education requirements.</p> <p>5. The New Homes Bonus is not ring fenced.</p> <p>6. The land values are considered to reflect best available information at the time. Government guidance recognises that some projects may be put at risk by a particular level of CIL, but the regulations specify that local authorities will 'strike an appropriate balance between the desirability of funding infrastructure and the potential effects of the imposition of the charge on the economic viability of development across its area.' (2010 CIL Regulation 14)</p>
CIL013	Strutt and Parker	<p>1. Schedule won't deliver fair and effective system of contributions</p> <p>2. The proposals will have a negative impact on deliverability of housing.</p> <p>3. There should be a differentiation between greenfield and brownfield. Brownfield sites aren't currently achieving sufficient returns and the imposition of further costs could result in a 50-100% reduction</p> <p>4. Proposed charging levels of 125m2 for residential and retail of 240m2 will have a significant negative effect on urban projects</p>	<p>1. Noted</p> <p>2 and 3. The viability work is considered to demonstrate otherwise. It considered different scenarios including greenfield and brownfield sites and did not establish a basis for different charging levels. The charge needs to be as simple and transparent as possible.</p> <p>4. There appears to be some confusion between costs and floorspace. The charging threshold is not considered to have a significant impact on viability given that smaller schemes would by definition also be paying smaller total levels of charging. It is accepted that some developments might not be viable under current economic conditions, but national policy</p>

		<p>being delivered. A greater reduction from 125m2 would be justifiable on brownfield land charging mechanisms. Charging mechanisms may have a negative impact on density given the cost per unit.</p> <p>5. A further significant discount for on-site affordable housing should be considered. There is no guidance on affordable housing in the evidence base – flexibility should be in-built.</p> <p>6. Colchester Borough Council has already committed to agreed planning obligations for the Betts site through a Development Brief.</p>	<p>recognises that ‘the introduction of CIL may put some potential development sites at risk. It is for charging authorities to decide what CIL rate, in their view, sets an appropriate balance between the need to fund infrastructure, and the potential implications for the economic viability of development across their area.’ (Para 21, Charge setting and charging schedule procedures)</p> <p>5. Affordable housing does not pay CIL. (See Regulation 49 of CIL Regulations 2010) Viability calculations undertaken for the evidence base factored in affordable housing contributions in line with Colchester Borough Council policy.</p> <p>6. Noted</p>
CIL014	Environment Agency	<p>The EA has identified other small scale drainage works that may benefit development in Colchester. Additional information on funded schemes is now available. Would welcome opportunity to input into the updated charging schedule and Section 123 list.</p>	<p>Some of the works identified may already be included in the £2.5 estimate of works included in the Infrastructure Table. The Council will work with the EA to update the charging schedule and prepare the Section 123 list. Site specific works will be expected to be delivered through S106 agreements.</p>
CIL015	Martin Robeson for Churchmanor Estates	<p>1. Council approach does not strike balance between desirability of funding infrastructure and potential effects of the change on economic viability.</p> <p>2. There is no evidence to justify why the infrastructure projects listed are required to deliver growth. There are 10 new projects that have been added since the Core</p>	<p>1. The CIL Evidence Base Report states that one of the core principles of the Colchester CIL is that it sets an appropriate balance between infrastructure funding and viability of development. The levies proposed are considered to be commensurate with viability.</p> <p>2-3. Evidence to back up the charging schedule needs to demonstrate that there is a funding gap, but is not expected to provide a detailed infrastructure delivery</p>

		<p>Strategy. No evidence to support costs is suggested and there seems to be double counting with charges for infrastructure to utility companies who already have a form of CIL in place</p> <p>3. Alternative sources of funding should be taken into account in the evidence base.</p> <p>4. The evidence base includes an admission that viability assumptions are neither transparent nor accurate. The use of standard construction costs ignores the Council's objectives to secure high quality design. Assumptions included in the viability assessment are inadequate and unjustified.</p> <p>5. Charging levels are not based on an appropriate or adequate evidence base.</p> <p>6. Only one example is used in the viability assessment. There is no sensitivity testing to assess different assumptions and thresholds. There is no justification of costs used or examples of actual development used to inform calculations. Timing information isn't provided – will the charge be robust over time? More information is required on 'exceptional circumstances'.</p> <p>7. More sophisticated calculation is appropriate for commercial and retail development.</p>	<p>plan. Infrastructure will come forward in tandem with new development and cannot be fixed precisely until developer requirements are clear. It is appropriate to update the work carried out for the Core Strategy 3-4 years ago to ensure that estimates of the infrastructure needed to support growth are as reliable as possible. Government guidance acknowledges that funding priorities can change over time. (Para 15, Charge setting and charging schedule procedures) Further refinements to the infrastructure evidence base are being undertaken. This will include information from utility companies on other funding sources</p> <p>4-6. The costs used by the consultants reflect the best available information available and are considered to be accurate.</p> <p>7. Simplicity is a key concern for the development of a transparent charge, so development of a complicated formula for commercial and retail projects is not supported. The CIL Evidence Base Report considered different scales and location of retail development as well as specific viability analysis of B-use class, leisure, hotel and residential care homes.</p> <p>8. Information on other funding sources will be provided in a general form but cannot be relied as absolute figures. Government guidance (Charge Setting and Charging Setting Procedures para 14) notes that 'there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. The focus should be on providing evidence of an aggregate funding gap that demonstrates the need to</p>
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CIL016	Martin Robeson for Tesco Stores	<p>1. Council approach does not strike balance between desirability of funding infrastructure and potential effects of the change on economic viability.</p> <p>2. There is no evidence to justify why the infrastructure projects listed are required to deliver growth. There are 10 new projects that have been added since the Core Strategy. No evidence to support costs is suggested and there seems to be double counting with charges for infrastructure to utility companies who already have a form of CIL in place</p>	<p>1. The CIL Evidence Base Report states that one of the core principles of the Colchester CIL is that it sets an appropriate balance between infrastructure funding and viability of development. The levies proposed are considered to be commensurate with viability.</p> <p>2-3. Evidence to back up the charging schedule needs to demonstrate that there is a funding gap, but is not expected to provide a detailed infrastructure delivery plan. Infrastructure will come forward in tandem with new development and cannot be fixed precisely until developer requirements are clear. It is appropriate to update the work carried out for the Core Strategy 3-4 years ago to ensure that estimates of the infrastructure</p>



		<p>3. Alternative sources of funding should be taken into account in the evidence base.</p> <p>4. The evidence base includes an admission that viability assumptions are neither transparent nor accurate. The use of standard construction costs ignores the Council's objectives to secure high quality design. Assumptions included in the viability assessment are inadequate and unjustified.</p> <p>5. Charging levels are not based on an appropriate or adequate evidence base.</p> <p>6. Only one example is used in the viability assessment. There is no sensitivity testing to assess different assumptions and thresholds. There is no justification of costs used or examples of actual development used to inform calculations. Timing information isn't provided – will the charge be robust over time? More information is required on 'exceptional circumstances'.</p> <p>7. More sophisticated calculation is appropriate for commercial and retail development.</p> <p>8. Lack of information on funding gaps for necessary infrastructure.</p> <p>9. CIL levels risk undermining the chances of development and thus infrastructure being delivered. CIL levels are far in excess</p>	<p>needed to support growth are as reliable as possible. Further refinements to the infrastructure evidence base are being undertaken. This will include information from utility companies on other funding sources</p> <p>4-6. The costs used by the consultants reflect the best available information available and are considered to be accurate.</p> <p>7. Simplicity is a key concern for the development of a transparent charge, so development of a complicated formula for commercial and retail projects is not supported. The CIL Evidence Base Report considered different scales and location of retail development as well as specific viability analysis of B-use class, leisure, hotel and residential care homes.</p> <p>8. Information on other funding sources will be provided in a general form but cannot be relied as absolute figures. Government guidance (Charge Setting and Charging Setting Procedures para 14) notes that 'there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. The focus should be on providing evidence of an aggregate funding gap that demonstrates the need to levy CIL.' Infrastructure will come forward in tandem with new development and cannot be fixed precisely until developer requirements are clear. The Council agrees that CIL funding cannot be used to address historic deficiencies.</p> <p>9. The CIL charge has been set at a level that will meet a proportion of identified infrastructure needs without compromising overall development delivery. The small</p>
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		of other local authorities.	number of CIL charges approved to date vary widely according to the different values prevailing around the country. The proposed levels for Colchester reflect higher land values found in the south-east. (Not many other CILs have been set– Redbridge £70 + £35 Crossrail levy - £105 total (+ GLA levy), Portsmouth £105, Greater Norwich £85 outer area and £170 inner area)
CIL017	Bloor Homes	<p>1. Levy is set too high and will hinder delivery.</p> <p>2. Viability questioned – Inflated rates of sale prices, depressed build cost rates, inflated affordable housing revenues, Unrepresentative average unit sizes, Unrealistic Profit and Land values</p> <p>3. Concern about the effect of a levy on employment should extend to housing since it creates employment.</p> <p>4. Clarification needed to ensure levy raised is spent on the most appropriate projects and that they are delivered cost effectively and in a timely manner.</p> <p>5. Clarification also needed on additional funding sources, particularly where one company appears to be subsidising</p>	<p>1. The CIL Evidence Base Report concluded that the levy was commensurate with viability. In particular, the analysis focused on the strategic greenfield sites that will be delivering the majority of new housing units and found the development in these growth areas would not be compromised by the proposed CIL charge.</p> <p>2. The costs used by the consultants reflect the best available information available and are considered to be accurate.</p> <p>3. The point is noted, but equally the provision of new infrastructure supported by CIL funding will also create employment. Permitting housing to be built without supporting infrastructure is considered to be damaging to the overall prospects for the Borough to attract new employers.</p> <p>4. Governance arrangements will be put in place to ensure full Council and public scrutiny and to ensure that projects are delivered cost effectively and in a timely manner.</p> <p>5. Information on other funding sources will be provided in a general form but cannot be relied as</p>

		<p>another. Some of the leisure and recreation projects appear to be responding to historic deficits.</p> <p>6. Indication of the Council's position requested on:</p> <ul style="list-style-type: none"> <li>• Exceptional Circumstances Relief</li> <li>• Role of S. 106 obligations</li> <li>• Use of 'payment in kind'</li> <li>• Instalments</li> <li>• Monitoring and review</li> </ul>	<p>absolute figures. Government guidance (Charge Setting and Charging Setting Procedures para 14) notes that 'there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. The focus should be on providing evidence of an aggregate funding gap that demonstrates the need to levy CIL.' Infrastructure will come forward in tandem with new development and cannot be fixed precisely until developer requirements are clear. The Council agrees that CIL funding cannot be used to address historic deficiencies.</p> <p>6. These areas are covered in general by the CIL Regulations 2010 and 2011 Amendments, but further detailed guidance will be developed as needed to support the draft schedule to be submitted to Government for examination.</p>
CIL018	Highways Agency	<p>1. No specific comments, however the approach taken marginalises the infrastructure requirements, with an acceptance that there will be a significant funding gap. There is a significant risk that infrastructure requirements will not be met whilst developments proceed on the basis that CIL requirements have been met. Further refinement work on costs is needed – estimate of £30m to deliver trunk road improvements not supported by sufficiently detailed work.</p> <p>2. Prioritising mechanism is needed.</p>	<p>1. Guidance stipulates the funding gap and notes that local authorities will have discretion to put a high premium on funding infrastructure 'if they see this as important to future economic growth in their area, or if they consider that they have flexibility to identify alternative development sites, or that some sites can be redesigned to make them viable.' Para 7, Charge setting and charging schedule procedures). Further refinements to the infrastructure evidence base are being undertaken.</p> <p>2. Governance arrangements will be put in place to ensure full Council and public scrutiny and appropriate prioritising mechanisms.</p>

CIL019	Lexden Restoration and Development	<p>Concerned about the incremental approach of charging on developer costs which is particularly severe for smaller developers.</p> <p>Tym work fails to carry out a cost assessment of a smaller site and further work on this issue should be carried out.</p> <p>Council needs to engage with local small to medium sized developers to gain a greater understanding of their role and the pressures they are under.</p>	<p>The Evidence Base study notes that the base level scheme uses a large residential site on the outskirts of the Colchester urban area because this is where the critical mass of new housing is planned. While housebuilders will incur higher building costs on smaller sites, they will usually be spared the higher burden of providing extensive on site infrastructure and open space cost requirements. The volume of anticipated development on smaller sites will not be critical to achieving the overall planned number of houses and did not warrant the additional complexity of a differentiated charge in the CIL. It is also noted that smaller schemes will by definition pay lower charges since calculations are based on the size of the scheme.</p>
CIL020	Essex County Council	<p>Endorse Draft Charging Schedule and proposal for an outline governance structure for CIL in Colchester-</p> <ul style="list-style-type: none"> <li>(i) A Decision Making group consisting of one or more Member and one or more senior officer from ECC and CBC</li> <li>(ii) An Advisory officer only level group</li> </ul>	Noted
CIL021	Vaughan & Blyth	<p>Fear that the continual introduction of financial contributions will render sites unviable. Viability model based on a green field site rather than types of brownfield sites small developers would be likely to be involved with. This means that the land</p>	<p>The Evidence Base study notes that the base level scheme uses a large residential site on the outskirts of the Colchester urban area because this is where the critical mass of new housing is planned. While housebuilders will incur higher building costs on smaller sites, they will usually be spared the higher burden of</p>

		values in the viability work are too low, and build costs used are also insufficient. Adding affordable housing contributions to the costs will make development in the Borough uneconomic for developers, who will look in adjacent authorities for land.	providing extensive on site infrastructure and open space cost requirements. The volume of anticipated development on smaller sites will not be critical to achieving the overall planned number of houses and did not warrant the additional complexity of a differentiated charge in the CIL. There is no certainty about affordable housing at the present time. Comments about figures used in the viability assessment are noted and will be checked.
CIL022	Peacock and Smith	Concerned that the differential rate for retail development could impact on the viability of future edge and out of centre retail development. Viability analysis doesn't appear to take into account all likely costs associated with developing a new foodstore, including land remediation and land taxes. The edge and out of centre rate is significantly higher than other areas.	The CIL Evidence Base Report found that larger out-of-centre or edge-of-centre retail continues to be one of the best performing sectors in the UK and accordingly a higher charge for this type of development was found to be viable.
CIL023	Denis Palmer	Will CIL be raised on the Colchester United development in Tiptree? Money is needed for new infrastructure there to compensate for the proposed housing/sports area development.	CIL will affect all new developments receiving planning permission after its adoption. The decision on how it will be spent will be made by the Council as charging authority and identified in the 123 list.
CIL024	Andrew Crayston	1. Levy will affect small sites and brownfield sites in particular, including redevelopment in the Hythe. Consideration should be given to exempting regeneration areas particularly in the case of the Hythe where partial development has left an	1. The Evidence Base study notes that the base level scheme uses a large residential site on the outskirts of the Colchester urban area because this is where the critical mass of new housing is planned. The consultants looked in particular at the Hythe area but did not consider it appropriate to vary the charge.

		<p>unsatisfactory situation. If the development charge is too high, developers will hold back on development until proposals completely collapse.</p> <p>2.The calculation of the levy adopts a residual valuation approach which uses an unrealistic base value of land. Best market evidence should have been used which would give higher figures. Previous attempts to drive down land values have put up development costs and increased sale prices.</p> <p>3. The short term exemption from social housing on less than 10 units is a help as would be the removal of the open space contribution levy.</p> <p>4. Supports exemption of conversion of listed buildings which should help stimulate preservation of our heritage.</p> <p>5. Appreciates that the process of adoption will involve considerable ongoing discussion.</p>	<p>2. The valuation approach is commonly used and is a simple approach which reflects guidance from DCLG.</p> <p>3. this comment relates to SPD/S106 contributions</p> <p>4. Noted</p> <p>5. Noted</p>
CIL025	Natural England	<p>1. No comments regarding charging schedule.</p> <p>2. Pleased to see projects in the evidence base linked to carbon reduction and green links</p> <p>3. Hope that 123 List will include multifunctional green infrastructure - Natural England will help to develop this.</p>	Noted.

CIL026	The Planning Bureau Limited on behalf of McCarthy & Stone	<p>1. A charge worked out on a pound per square metre basis unfairly penalises developers of retirement housing who have to provide communal areas which are non saleable. Therefore suggest a reduced figure for specialist housing or a zero figure as applied to care homes etc.</p> <p>2. Viability implications have not been taken into account. Retirement homes have been grouped into a general residential class.</p> <p>3. Suggest we should allow instalments and flexibility in payments.</p>	<p>1. The Government sets out that the 'levy <b>must</b> be charged in pounds per square metre on the net additional increase in floorspace of any given development.'</p> <p>2. Care homes were looked at but there was no justification for reducing the charge.</p> <p>3. Agreed - the Council will be producing an instalments policy.</p>
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