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## **Report to Tamworth Borough Council**

**by Yvonne Wright BSc (Hons) Dip TP MSc DMS MRTPI**

**an Examiner appointed by the Council**

**Date: 13 February 2018**

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PLANNING ACT 2008 (AS AMENDED)

SECTION 212(2)

### **REPORT ON THE EXAMINATION OF THE TAMWORTH BOROUGH COUNCIL COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE FOR SUBMISSION**

Charging Schedule submitted for examination on 25 August 2017.

Examination hearing held on 1 November 2017.

File Ref: PINS/G4240/429/7

## Non Technical Summary

This report concludes that, subject to the modifications set out in Appendix A, the Tamworth Borough Council Community Infrastructure Levy Draft Charging Schedule For Submission provides an appropriate basis for the collection of the levy in the area. The Council has sufficient evidence to support the schedule and can show that the levy is set at a level that will not put the overall development of the area at risk.

### Introduction

1. This report contains my assessment of the Tamworth Borough Council Community Infrastructure Levy Draft Charging Schedule For Submission in terms of Section 212 of the Planning Act 2008. It considers whether the schedule is compliant in legal terms and whether it is economically viable as well as reasonable, realistic and consistent with national guidance.
2. To comply with the relevant legislation the local charging authority has to submit a charging schedule which sets an appropriate balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across the District.
3. The basis for the examination, during which a single Hearing day was held on 1 November 2017, is the Tamworth Borough Council Community Infrastructure Levy Draft Charging Schedule For Submission (DCSS), submitted for examination on 25 August 2017 (CIL\_06). It replaced an earlier Draft Charging Schedule (DCS) which was subject to public consultation between 23 October 2015 and 4 December 2015. The DCSS has amended the latter document with five modifications published for consultation at the time of submission. These modifications are also set out separately in the *Statement of Modifications (Regulation 19(d))* published in August 2017 (CIL\_05).
4. Previous to this a Preliminary Draft Charging Schedule was published in 2014 and made available for public consultation between 30 October and 11 December 2014.
5. The Council proposes to include Borough-wide differential charging rates for residential development based on the scale of development and use of buildings. The proposed rates are: £68 per square metre (psm) for schemes of 3-10 units; £35 psm for schemes of 11 units or more and nil rates for developments of 1-2 units, retirement dwellings, extra care schemes and care homes.

6. The Council also proposes a £200 psm charge for all retail development outside of Tamworth town centre, local centres and neighbourhood centres. A zero rate would apply to all other development.
7. At the Hearing I received updated tables for infrastructure costs, secured funding levels and the estimated funding gap (CIL\_EX\_04 01/11/17 update).
8. I also requested at the Hearing that the Council provide the following additional information:
  - Maps clearly defining the areas/zones to which the different charging rates apply and a review of relevant wording within the schedule to refer to the charging zones maps;
  - Definitions for the terms '*retirement dwellings, extra care and care homes*' for reasons of clarity;
  - A review of wording to clarify the following:
    - i. the '*one or two unit residential scheme*' exemption;
    - ii. the reference to the draft Regulation 123 list;
    - iii. the charging rate for retail development that is '*In Centre*'; and
    - iv. how the charging schedule will be monitored and reviewed.
9. Whilst these matters were discussed at the Hearing the information was received after the Hearing in a document entitled *Tamworth Borough Council – Community Infrastructure Levy Statement of Modifications post examination hearing (Regulation 19(d)) November 2017* (CIL\_EX\_07), together with the following maps:
  - *Residential Charging Zones Map* (CIL\_EX\_08 APP\_A1);
  - *Retail Charging Zones Map* (CIL\_EX\_09 APP\_2);
  - *Town Centre Plan* (CIL\_EX\_10 APP\_3);
  - *Local Centre Plan* (CIL\_EX\_11 APP\_A4) and
  - *Neighbourhood Centre Plans* (CIL\_EX\_12 APP\_A5).
10. These proposed modifications were all consulted on between 22 November 2017 and 20 December 2017. Three representations were received during this period. In addition the Council produced a response to these representations which was received on 5 January 2017. In reaching my conclusions I have taken all relevant representations into account, including those relating to the proposed modifications.

**Is the charging schedule supported by background documents containing appropriate available evidence?**

*Infrastructure planning evidence*

11. The *Tamworth Borough Council Local Plan 2006-2031* (LP) (CIL\_12) was adopted in February 2016. This sets out the main elements of growth, including the provision for a minimum of 4,425 new homes; a minimum of 18 hectares of new employment land; 7,800 sqm of new comparison retail floorspace and 2,900 sqm of new convenience retail floorspace within the Borough. The growth strategy directs this development to within and around Tamworth town centre and within the network of local and neighbourhood centres, regeneration priority areas and employment areas. In addition the Council proposes that the Borough's remaining objectively assessed housing and economic needs of around 1,825 dwellings and a minimum 14 ha of employment land are met by neighbouring authorities.
12. The LP allocates three sustainable urban extensions at Anker Valley, Tamworth Golf Course and Dunstall Lane to include the delivery of around 535; 1,100 and 723 new homes respectively within the Plan period.
13. The Council recognises that new development will need to be supported by further infrastructure including transport, public realm enhancements, flood defences, green infrastructure, schools and community facilities. This is detailed within the Council's Infrastructure Delivery Plan (IDP) which forms Appendix B of the LP (CIL\_12). This was prepared in support of the LP which was found sound following its examination. As such and in accordance with the Planning Practice Guidance (PPG) I do not re-appraise the infrastructure planning work in this CIL examination.
14. I note that the IDP is currently under review but the Council provided updated tables on infrastructure schemes which were submitted at the Hearing. These give details of specific infrastructure requirements, progress on implementation, known costs, levels of secured funding and additional anticipated funding streams.
15. The updated estimate for total known infrastructure costs is around £76.7m. Taking account of the updated level of funding expected to be secured of around £51.5m (which includes S106 planning agreement funding of approximately £22.2m), the estimated funding gap is around £25.2m. However as some of the infrastructure has yet to be costed the Council accepts that this funding gap will be significantly higher than this estimate.
16. The Council indicates that the anticipated CIL income will be around £3.5m. This equates to nearly 5% of total known infrastructure costs and around 14% of the estimated funding gap. This would be collected mainly from residential development, as the Council indicates that retail needs for the Plan period will

generally be satisfied by the recently permitted Gungate scheme and additional development that comes forward within centres.

17. Overall therefore the CIL revenue would make a contribution, albeit minor, towards filling the infrastructure funding gap.
18. The Council has produced a draft Regulation 123 list which is set out in Appendix A of the DCSS. This provides a list of some specific projects together with broader categories that the Council intends to fund, partly or wholly, through CIL receipts. This includes local transport improvement projects and open space, leisure and public realm enhancements.
19. The Council's infrastructure planning documents were considered as part of the LP examination. As stated in paragraph 13 above I do not re-appraise the infrastructure planning work in this CIL examination. I am satisfied therefore that the Council's infrastructure planning evidence supports the DCSS.
20. Accordingly, I conclude that the infrastructure planning evidence provided is sufficient to confirm there is a significant funding gap and indicates how much funding is proposed to be received through CIL receipts. As such the need to levy a charge on future development has been demonstrated.

*Economic viability evidence and approach to rate setting*

21. The Council has produced viability evidence in the form of the following documents:
  - the *Tamworth Borough Council Whole Plan Viability, Affordable Housing and CIL Study Final Report (April 2014)* (CIL\_07) (referred to in this report as 'VA1');
  - the *Tamworth Borough Council Whole Plan Viability, Affordable Housing and CIL Study Further Advice Addendum Report (March 2015)* (CIL\_08) (referred to in this report as 'VA2');
  - the *Tamworth PDCS Responses – review and technical note (May 2016)* (CIL\_09) (referred to in this report as the 'Technical Note'); and
  - the *Tamworth CIL Viability Update Study Final Report (August 2017)* (CIL\_10) (referred to in this report as 'VA3').
22. The appraisals set out within the viability assessments are based on a residual valuation approach using assumptions for a range of factors including build costs and profit levels. In summary the appraisals generally seek to establish a residual value by subtracting all costs (except for land purchase) from the value of the completed development (the *gross development value*). The price at which a typical willing landowner would be prepared to sell the land (the

*threshold or benchmark land value*) is then subtracted from the residual value to arrive at the *overage* or '*theoretical maximum charge*'. This is the sum from which the CIL charge can be taken provided that there is a sufficient viability buffer or margin. I note that as affordable housing is not liable to a CIL charge, an allowance for this is made in the assessments.

23. The provision of a viability buffer is recommended by the PPG<sup>1</sup> so that the levy rate is not set at the margins of viability and is able to support development when economic circumstances adjust. This can also provide some degree of safeguard in the event that gross development values have been over-estimated or costs under-estimated and to allow for variations in costs and values between sites. In broad terms, I consider that appropriate buffers have been applied.

#### Residential development

24. Most of the assumptions used for the residential development appraisals have not been significantly questioned and no alternative evidence has been provided.
25. The appraisals have tested a range of residential development sites and typologies between 1 and 1,100 dwellings, which generally reflect the likely size of development sites proposed to come forward during the Plan period. They have also taken account of the Council's affordable housing policy cost which is appropriate.
26. The benchmark land values and sales values are based on a review of viability evidence including local market data, published data and discussions with developers, agents and other stakeholders and have been updated in VA3 to reflect land and house price increases. This is reasonable.
27. The build cost assumptions use reasonably up to date BCIS data that has been rebased to represent local values and allowances are applied for external works and contingencies. In addition the appraisals include increased costs relating to brownfield land sites to reflect associated abnormal costs and also include opening up costs for larger sites. The assumptions for other cost factors including developer profit, fees and finance costs generally follow industry standards. Development cost assumptions are therefore reasonable.
28. Estimated site specific S106 costs have been included for the strategic sites, in recognition of the additional infrastructure needed to develop such sites. Whilst no S106 cost assumptions are applied for the non-strategic residential typologies due to a lack of clear evidence, I consider the viability margins are sufficient to accommodate some additional costs without prejudicing the delivery of development. The approach is therefore reasonable.

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<sup>1</sup> Planning Practice Guidance Paragraph 019 - Reference ID: 25-019-20140612

29. It has been suggested that the estimated costs for the development of the Dunstall Farm strategic site are actually higher than those used within the appraisals. Whilst I recognise that costs may change as the scheme progresses, I must base my assessment on the available evidence. No alternative costs are before me. Therefore as the viability evidence shows a significant viability buffer of 72% for this site I consider this would provide for some additional costs. Overall therefore I am satisfied that the Council's approach for the Dunstall Farm strategic site is reasonable.
30. Some specific assumptions have been used for retirement and extra care housing and care homes. These have been derived from market comparable information and evidence provided by developers of such schemes. These reflect that such developments are typically flats at higher densities than most other residential development and include such factors as communal floorspace requirements and additional marketing costs. The assumptions appear to be generally in accordance with industry standards for these forms of development and are therefore reasonable.
31. Overall, in the absence of evidence to the contrary, I have no reason to doubt the Council's approach to the viability assumptions used for residential development. The approach is appropriate and is therefore justified.

#### Retail development

32. For retail development the Council originally produced separate viability appraisals for supermarket, retail warehouse and town centre retail development, as set out in AV1. The typologies were extended in AV3 to include out of centre small local convenience stores and smaller supermarkets, to account for development changes in the retail sector. The Council has confirmed that these scenarios generally reflect the range of retail likely to come forward for development within the Borough during the Plan period.
33. Assumptions for land values, rental rates and yields are broadly based on local transactional data, where available and commercial property sources. The assumptions were re-assessed in AV3 based on more recent data.
34. It has been argued that in terms of the retail appraisals the market evidence is limited, incomplete or absent. At the Hearing I heard, amongst other things, that the 11% town centre retail yield assumption is too high and build costs are too low. The representor questioned the viability assumptions for the town centre Gungate retail scheme and the likelihood of it being implemented, a scheme proposed to deliver the majority of the Borough's retail floorspace requirements up to 2021 as set out in the LP.
35. Whilst the Council acknowledged that the viability of this scheme is a concern, the development has recently obtained outline planning consent and it would not be liable to pay a CIL charge.

36. In addition it is suggested that in the current market an incentive package including a 2 year rent free period is required to secure retailers, rather than the 6 month rent free period used in the appraisals. Whilst I recognise that some retail related incentive packages may be likely to be above the 6 month period used in the appraisals, it is also likely that some retailers do not require any incentive package.
37. Whilst I recognise that there will always be site specific exceptions, it would not be reasonable for the appraisals to take account of every variable, considering its purpose is to provide a broad assessment of economic viability for retail development across the Borough. I note that whilst build costs have increased since 2016, this is only one element within overall development costs. Furthermore it is appropriate for costs assumptions to be based on a single data point for consistency. I therefore find the Council's approach is appropriate.
38. Overall, based on the available evidence, I have no reason to doubt the Council's approach to the viability assumptions used for retail development. I therefore consider that the approach is reasonable.

#### Other development

39. There is no dispute about the assumptions used in the viability appraisals for other forms of development within the Borough (town centre office, business park, industrial, warehouse and hotel). These have been derived from market comparables, published data and industry standards and I have no reason to doubt their appropriateness. The Council's approach therefore appears reasonable.

#### *Conclusion*

40. The DCSS is supported by detailed evidence of community infrastructure needs and economic viability. The assumptions made by the Council generally reflect appropriate industry costs and are not set too low. The existence of contingency costs and the use of viability buffers reinforces the Council's approach and generally provides reasonable margins for additional costs. Overall I conclude that the Council's viability evidence is robust, proportionate and appropriate.

#### **Are the charging rates informed by and consistent with the evidence?**

##### *CIL rates for residential development*

##### 1-2 unit schemes

41. A CIL charge of £0 psm is proposed for small residential schemes of one or two units within the Borough. VA3 indicates that the maximum headroom available for this level of development is £47 psm. Taking into account that



the amount of development from this source would be rather modest and that if a CIL charge was applied the cost of collecting it may be larger than the actual sum, the Council's pragmatic approach to charge a nil rate is reasonable.

42. I note that the DCSS incorrectly refers to such development sites as being exempt from the CIL charge. As a £0 psm rate is proposed to be applied I recommend the charging schedule is modified in accordance with modification **EM2**.

### 3-10 unit schemes

43. The Council originally proposed a CIL charge of £35 psm for residential schemes of 3 or more units within the previous DCS. Following consultation and a review of some of the assumptions a differential was introduced in the DCSS between smaller and larger developments based on the number of units in the scheme. The DCSS sets out a CIL rate of £68 psm for schemes between 3 and 10 units, with developments of 11 dwellings or more staying at £35 psm.
44. The AV3 shows that for residential developments of 3 to 10 dwellings overages<sup>2</sup> range from £73 psm to £192 psm. Whilst the £68 psm charge rate is close to the lower £73 psm headroom highlighted, it still leaves a buffer of 7%, albeit that this is small. I also note that this buffer relates to one named site within the Borough and includes specific viability assumptions. At other sites the buffer would be larger. Indeed the higher headroom of £192 psm would leave a significant buffer of 65%.
45. Overall as sites of 3-10 units would be unlikely to incur major additional costs such as S106 costs and there would generally be reasonable buffers, the charge of £68 psm for this form of development is acceptable.

### 11 or more unit schemes

46. For residential developments of 11 dwellings or more, AV3 states that overages range from £39 psm to £214 psm. The proposed £35 psm CIL charging rate results in buffers ranging from 10% to 84%, whilst for the strategic sites the range is from 49% to 72%.
47. Whilst a representor (B & S Aucott) suggests that the Dunstall Farm strategic site should be exempt from CIL, the evidence before me shows that a charge of £35 psm would not put the development of this site at risk. No alternative costed evidence has been provided. Furthermore the CIL regulations do not permit S106 contributions and CIL income to pay for the same infrastructure item and therefore there would be no 'double-counting'. The Council in its

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<sup>2</sup> The overage or headroom is the difference between the value of the completed development and the overall cost of the development, expressed in £ psm

Section 106 Statement (CIL\_11) sets out what will be funded by S106 contributions and CIL. The identified viability buffer of 72% for this site provides a substantial margin for any additional costs. Based on the evidence before me, the charge is therefore appropriate.

48. In conclusion I consider the margins for residential development, including some of the smaller ones, would overall provide sufficient flexibility so that this form of development would not be put at significant risk. I therefore consider the £35 psm charging rate is reasonable.

Specialist residential development – retirement dwellings, extra care and care homes

49. The £0 psm charges for specialist residential development consisting of retirement dwellings and extra care homes were reduced initially from £35 psm to £15 psm and then from £15 psm to zero in the previous versions of the draft charging schedules. The DCSS £0 psm rate reflects up to date viability evidence produced for this type of development (CIL\_09 and CIL\_10). These show that there is significant negative viability and accordingly the nil rate is appropriate. The evidence also shows that care home schemes generate negative viability values and as such the £0 psm rate proposed is justified.
50. Whilst the charging rates are acceptable, the charging schedule does not clearly define what is meant by specialist residential development. I therefore recommend, for reasons of clarity and to provide certainty, that the different uses are combined under one charging rate and definitions of the terms used are included (**EM3** and **EM4**).

Conclusion

51. Taking all the above into account, and subject to the modifications, I conclude that the residential CIL charging rates proposed are appropriate and are consistent with and justified by the evidence.

*CIL rates for retail development*

52. The viability assessments identify that in contrast to all other types of commercial development, retail development generates positive residual values, but only when located outside of centres.
53. On this basis the charging schedule proposes a rate of £200 psm for out of centre retail. The evidence indicates that the maximum overages for this are £316 psm for a retail warehouse, £442 psm for a supermarket, £539 psm for a smaller supermarket, and £757 psm for a small local convenience store. This provides considerable buffers of 37%, 55%, 63% and 74% respectively.
54. Whilst it has been put to me that the out of centre retail charge should be substantially reduced to be in line with charges set by neighbouring

authorities, and capped at a maximum £100,000 per scheme, no substantive alternative evidence has been provided to show that this would be necessary for reasons of viability. Furthermore rates within neighbouring authority areas will be based on specific evidence for those areas and not the charging area that is before me. The charge is consistent with the available evidence and provides considerable margins to take account of additional costs. It is therefore reasonable.

55. As regards retail development within centres, the viability assessment indicates that this would not be viable if a CIL charge was applied. The Council confirmed at the Hearing that a £0 psm charge was implied by the charging schedule but agreed that it was not explicitly set out in the DCSS. Based on the evidence, and as suggested by the Council, I agree that a £0 psm charge rate is appropriate for in centre retail and recommend that this be added to the schedule to provide clarity and certainty (**EM6**).
56. In conclusion, I am satisfied that the proposed zonal approach for retail development reflects the ability of those areas to support the CIL charges and is therefore justified.

*Residential and retail charging zones maps*

57. The CIL Regulations require that geographically defined charging zones must be identified on an Ordnance Survey based map which shows national grid lines and reference numbers. I note that the map in the charging schedule shows the former but not the latter.
58. In order to comply with the Regulations and to ensure that the zones for different charges are clearly defined, the Council has proposed to replace the map within the DCSS with separate residential and retail charging zone maps and inset plans for the town centre, local centres and neighbourhood centres (CIL\_EX\_08 APP\_A1, CIL\_EX\_09 APP\_2, CIL\_EX\_10 APP\_3, CIL\_EX\_11 APP\_A4 and CIL\_EX\_12 APP\_A5). I recommend that the charging schedule be modified accordingly (**EM7**). As a consequence, reference to these new charging zones maps also needs to be reflected within the charging rate table for out of centre retail as defined in modification **EM5**.
59. Whilst there are several charging zones within the charging schedule there is only one charging area (the Borough of Tamworth). As such I see no reason to amend this reference within the schedule, as suggested by the Council.

*Other development*

60. The evidence indicates that other forms of development have negative viability. The £0 CIL rate is therefore justified.

*Other matters*

61. Several representations have queried the contents of the draft Regulation 123 list. The PPG advises that it is for the charging authority to draw up the list and to ensure they are clear on what developers will be expected to pay, whether this is through section 106 agreements or via CIL. Whilst the draft Regulation 123 list is not before me for examination I consider that the Council has clearly defined what will be paid for by this funding route.
62. As the draft Regulation 123 list does not form part of the charging schedule, for reasons of clarity and to assist the Council should updates to the list be necessary, its removal from the schedule is recommended (**EM8**). I find that changes to the text of the schedule relating to the draft Regulation 123 list and as suggested by the Council, are also necessary (**EM1**).
63. The Council has produced policies relating to instalments, exceptional circumstances and payments in kind. These are discretionary and the viability evidence has been prepared having regard to them. As they do not form part of the charging schedule, for reasons of clarity and to assist the Council should a review of the policies be necessary, I would advise their removal from the charging schedule.

**Does the evidence demonstrate that the proposed charge rates would not put the overall development of the area at serious risk?**

64. The Council's decision to set the rates in the charging schedule is based on reasonable assumptions about development values and likely costs. In setting the rates the Council has had regard to detailed evidence on infrastructure planning and the economic viability evidence of the development market in the Borough of Tamworth. The evidence indicates that the overall development of the area, as set out in the development plan, will not be put at risk if the proposed charges are applied, subject to the recommended modifications.
65. However it would be prudent for the Council to keep the charging schedule monitored and under review to assess the operation and impact of the charging rates on development and to take account of planning policy changes. Indeed this is a requirement set out in the PPG. Monitoring will ensure that the overall approach taken by the Council towards CIL remains valid, that development remains viable and that an appropriate balance is being struck. In this instance, to aid clarity on this matter modification **EM9** is recommended.

**Conclusion**

66. Overall, and subject to the recommended modifications, an appropriate balance has been achieved between the desirability of funding the costs of new infrastructure and the potential effects on the economic viability of development across the charging area.

<b>LEGAL REQUIREMENTS</b>	
National Policy/Guidance	Subject to the recommended modifications the Charging Schedule complies with national policy/guidance.
2008 Planning Act and 2010 Regulations (as amended)	The Charging Schedule complies with the Act and the Regulations, including in respect of the statutory processes and public consultation, consistency with the adopted Core Strategy and Infrastructure Delivery Study and is supported by adequate financial appraisals.

67. I conclude that, subject to the modifications set out in Appendix A, the Tamworth Borough Council Community Infrastructure Levy Draft Charging Schedule for Submission satisfies the requirements of Section 212 of the 2008 Act and meets the criteria for viability in the 2010 Regulations (as amended). I therefore recommend that the Charging Schedule be approved.

*Y Wright*

Examiner

This report is accompanied by **Appendix A** (attached) – Modifications that the Examiner specifies so that the Charging Schedule may be approved.

## Appendix A

Modifications recommended by the Examiner so that the Charging Schedule may be approved. New text is in **bold and underlined**.

<b>Examiner Modification (EM) Number</b>	<b>Reference</b>	<b>Modification</b>
<b>EM1</b>	Paragraph 2.4	Delete "and the Regulation 123 list" in second sentence and entire third sentence.
<b>EM2</b>	CIL charging schedule table row 2, column 2 "1-2 unit schemes"	Delete "exempt from CIL charge"
<b>EM3</b>	CIL charging schedule table rows 4 and 5, "Specialist residential" and "Care homes"	Combine "Specialist residential" and "Care homes" £0 rates into one row labelled "Specialist Residential" and move "retirement dwellings", "extra care" and "care homes" to the criteria column
<b>EM4</b>	Directly after the charging schedule table	<p>Insert definitions:</p> <p><b><u>Retirement dwellings – Also known as sheltered housing, these are usually groups of dwellings, often flats and bungalows, which provide independent, self-contained homes often with some element of communal facilities, such as a lounge or warden.</u></b></p> <p><b><u>Extra care – Also known as assisted living, this is housing with care whereby people live independently in their own flats but have access to 24-hour care and support. These are usually defined as schemes designed for an elderly population that may require further assistance with certain aspects of day to day life.</u></b></p> <p><b><u>Care homes – Residential or nursing homes where 24-hour care is provided together with all meals. Residents usually occupy under a licence agreement.</u></b></p>

<b>EM5</b>	CIL charging schedule table row 7 "Out of Centre Retail"	Delete the text in the 'Criteria' column and replace with:  <b><u>Comparison and convenience retail development located outside the Town Centre, Local Centres and Neighbourhood Centres as defined in the accompanying Charging Zones Maps</u></b>
<b>EM6</b>	Insert a new row "In Centre Retail" after "Out of Centre Retail"	New row labelled <b><u>In Centre Retail</u></b>  'Criteria' column to read: <b><u>Comparison and convenience retail development located inside the Town Centre, Local Centres and Neighbourhood Centres as defined in the accompanying Charging Zones Maps</u></b>  'CIL rate per square metre' column to read: <b><u>£0</u></b>
<b>EM7</b>	Charging Zone Map	Delete the Charging Zone Map and replace with separate plans showing the residential charging zones (CIL Residential Charging Zones Map), retail charging zones (CIL Retail Zones Map), and more detailed plans for the boundaries of the in centre retail areas.
<b>EM8</b>	Appendix A Regulation 123 list	Delete Appendix A and Appendix B 'CIL Charging Zones Maps' becomes Appendix A.
<b>EM9</b>	Directly after paragraph 3.5	Insert new section:  <b><u>4 Monitoring and Review</u></b>  <b><u>4.1 As part of the Council's annual monitoring regime a report will be published which will set out how much CIL money has been received and the infrastructure to which that money will be applied.</u></b>  <b><u>4.2 The Council needs to ensure that the CIL rates remain appropriate over time. The Tamworth CIL Charging Schedule will be kept under review, taking into account changing economic circumstances and viability. In addition to taking account of changes in market conditions the Council will consider revising the charging schedule in conjunction with any substantive review of the Local Plan.</u></b>

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