
Report to Vale of White Horse District Council

by Malcolm Rivett BA (Hons) MSc MRTPI

an Examiner appointed by the Council

Date: 15 May 2017

PLANNING ACT 2008 (AS AMENDED)

SECTION 212(2)

**Report on the Examination of
The Community Infrastructure Levy
Draft Charging Schedule
For Vale of White Horse District Council**

Draft Charging Schedule initially submitted for examination 17 April 2015

Examination hearing held on 19 April 2017

File Ref: PINS/V3120/429/6

Non-technical summary

This report concludes that, subject to modifications, the Community Infrastructure Levy Charging Schedule for Vale of White Horse District Council 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.

The modifications to the Draft Charging Schedule (December 2016) that are needed to meet the statutory requirements can be summarised as follows:

- Including in Zone 3 (£0 CIL charge) the Valley Park Local Plan 2031 (Part 1) strategic housing site (**RM1**).
- Changing the reference under Residential Development from "including... housing for the elderly and frail" to "including... sheltered housing" and defining a new development type (Extracare, nursing and care homes) and setting a District Wide £0 CIL charge for this development type (**RM2**).
- Removing from the schedule the definitions of supermarkets and retail warehouses (**RM3**).

The modifications which I am recommending are based on matters discussed during the public hearing and do not significantly alter the basis of the Council's overall approach or the appropriate balance achieved.

Introduction

1. This report contains my assessment of the Community Infrastructure Levy [CIL] Charging Schedule for Vale of White Horse District Council as required by Section 212 of the Planning Act 2008. It considers whether the schedule is legally-compliant and whether it is economically viable as well as reasonable, realistic and consistent with national guidance.
2. The CIL Draft Charging Schedule (February 2015) [doc CIL01] and the CIL Draft Charging Schedule Statement of Modifications (April 2015) [doc CIL02] were submitted for Examination in April 2015. Both documents were the subject of full public consultation. As examiner of both the CIL schedule and the Vale of White Horse Local Plan 2031 (Part 1) I concluded that, at that time, it was appropriate not to progress the CIL examination until there was more certainty about the policies and allocations of the Local Plan. Subsequently, following publication of my report into the Local Plan Examination, the plan was formally adopted by the Council in December 2016.
3. In December 2016, in the light of the adopted Local Plan and updated CIL viability evidence, the Council published for consultation further Proposed Modifications [doc CIL13] and an accordingly Updated Draft Charging Schedule document [doc CIL12]. Doc CIL12 was republished in January 2017 with corrections of some minor inconsistencies.

4. Given that the two CIL schedule modification documents (April 2015 and December 2016) have been the subject of full consultation I have taken the draft schedule incorporating these modifications (ie that of December 2016 [doc CIL12]) as the starting point for the Examination and from here on refer to this as the 'draft schedule'.
5. To comply with the relevant legislation, the local charging authority has to set CIL rates which strike an appropriate balance between, on the one hand, the desirability of funding from CIL infrastructure required to support the development of its area and, on the other, the potential effects of the imposition of CIL on the economic viability of development across its area.
6. For residential development the draft schedule (December 2016 [doc CIL12]) proposes three charging zones with CIL charges for residential development (including student accommodation and housing for the elderly and frail) of:
 - Zone 1 - £120 per square metre (psm)
 - Zone 2 - £85 psm
 - Zone 3 - £0 psm
7. Zone 3 incorporates the defined boundaries of the following strategic housing sites which are identified in the Local Plan 2031 (Part 1): Crab Hill, Monks Farm, Grove Airfield, East of Coxwell Road, Land South of Park Road, South of Faringdon, North of Shrivenham and Didcot Power Station. Zone 2 includes other defined land in Wantage, Grove and Faringdon and Zone 1 includes the remaining parts of the District.
8. Supermarkets and retail warehousing would be subject to a district-wide £100 psm charge. All other development (including residential development which is required to enable a rural exception site under Local Plan Core Policy 25) would be subject to a £0 psm charge district-wide.

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

Infrastructure planning evidence

9. The Vale of White Horse Local Plan 2031 (Part 1) was adopted in December 2016. Meeting the identified need for new housing is a primary focus of the plan and in the order of 20,560 new homes are to be delivered during the plan period, many of them on around 20 strategic housing sites. Additional employment land and locations for retail development are also identified in the plan.
10. Supporting the Local Plan is the Infrastructure Delivery Plan (IDP), most recently updated to December 2016 [doc CIL16]. This identifies the infrastructure the Council considers to be necessary to support the development envisaged by the Local Plan in terms of, amongst other things, transport, education, health, utilities, green infrastructure, leisure and emergency services. It also indicates (where known) the cost and potential sources of funding for the necessary infrastructure. The CIL Infrastructure and

Funding Report (also updated to December 2016) [doc CIL17] indicates a total cost of around £463m for this infrastructure and that, taking account of other likely sources of funding, there is a funding gap of approximately £157m in relation to IDP schemes which would be potentially eligible/suitable for CIL funding. The report identifies that the CIL charges as proposed in December 2016 would be likely to produce around £60m of revenue.

11. These figures demonstrate a need, in principle, to levy CIL and that it would be likely to make a material contribution towards closing the funding gap.

Economic Viability Evidence

12. The Council commissioned a CIL Viability Assessment of October 2014 [Doc CIL07] which is complementary to, and is based on the same broad analysis as, the October 2014 Local Plan Viability Study [Doc INF01]. These appraisals formed the supporting evidence of the Draft Charging Schedule of February 2015 [Doc CIL01]. Subsequently, in response to consultation comments, changed circumstances and more up to date viability evidence, partial updates of the CIL Viability Assessment were prepared in December 2015 [Doc EXAM2] and December 2016 [Doc CIL15], in the light of which the December 2016 Updated Draft Charging Schedule [Doc CIL12] was prepared. In view of consultation comments on the December 2016 draft schedule and my Matters and Questions for the Examination, the Council commissioned some further updating of the viability appraisal evidence, presented in a note of February 2017 [Doc EXAM5] and in its March 2017 Hearing Statement [Doc STAT1].
13. The viability assessments employ the commonly-used residual land value appraisal model to assess a range of types of residential and commercial development likely to come forward in the Vale during the Local Plan period. The assessments assume that CIL contributions will be funded from the residual value of the land on which it is constructed. This represents the gross development value of the development, less the costs of the development and the developer's profit. The difference between the residual value and the viability threshold value is the margin available for "developer contributions" (including CIL) – the viability threshold value being the minimum value at which it is assumed the landowner will sell the land. The assumed viability threshold value is, reasonably, the existing use value of the land plus 20% and a further £350,000 per ha on greenfield sites.
14. In advising on CIL rates for specific development types the appraisals have employed three main tests – that CIL should only be levied where the residual value of the land exceeds the viability threshold; that CIL charges should not be more than 25% of the residual value; and that CIL charges should not be more than 5% of the Gross Development Value. In principle these tests are reasonable although, as detailed below, I have also had regard to the advice in the Planning Practice Guidance that a 'buffer' or margin is included in setting CIL rates. Together, the Viability Assessments have appraised each of the 20 or so strategic housing sites included in the Local Plan, 16 theoretical (but typical) smaller residential developments of/in various sizes/locations, student accommodation, sheltered and Extracare housing and industrial, office, retail and hotel developments.
15. The appraisals are inevitably based on a wide range of assumptions and, to

varying degrees, a number of these have been criticised, including in relation to likely ongoing s106 costs, developer profit, build costs (including external works and garages), contingencies, residential density and mix, land promotion and marketing costs, interest rates/bank funding costs and land values.

16. In respect of ongoing s106 costs Oxfordshire County Council initially expressed significant concern at the contents of the December 2016 Update of the Regulation 123 list, which indicates the infrastructure which will be secured by s106 (or alternative measure) and which will, therefore, not be capable of being funded by CIL. Subsequent discussions between the District and County Council have resulted in the publication of a further update (March 2017) of the Regulation 123 list, against which the viability of the proposed CIL charges has been reviewed by the Council. A Statement of Common Ground indicates that, other than in relation to the funding of primary school expansion in connection with the Milton Heights strategic housing site (which I consider below), the County Council now considers that the most recent Regulation 123 list is appropriate available evidence in respect of CIL.
17. It is the case that there are a number of possible internal inconsistencies in the Regulation 123 list and ambiguities between it and the related Updated Infrastructure and Funding Report (December 2016) and Developer Contributions Supplementary Planning Document (December 2016). At the hearing the Council confirmed its intention, if and when it is in a position to adopt the CIL schedule, to revise these documents as necessary to remove any inconsistencies and ambiguities, in order that the documents provide the necessary clarity. However, I am satisfied that such revisions would be unlikely to significantly affect the costs of development. As such, the current appraisals of CIL viability would be unlikely to be undermined by these revisions.
18. In respect of the other disputed appraisal assumptions there is no single right or wrong answer, particularly as, in reality, these factors will vary significantly between one specific development and another. Other than in connection with Extracare housing, discussed below, and having careful regard to both the Council's justification of the assumptions used and the criticisms of them, I conclude that the assumptions employed are, overall, reasonable for the strategic level appraisal which it is appropriate to undertake in setting CIL rates. In reaching this conclusion I have borne in mind, as detailed below, that for most development the proposed CIL rates are less than 25% of the maximum level of CIL which the appraisal demonstrates could be viably paid. Consequently, in most cases, there is a substantial 'buffer' and the costs of development could be materially higher than has been assumed by the Council or the values of it materially less and CIL would not undermine the viability of the development. Moreover, it is of note that at the hearing the representative of the developer of one of strategic housing sites (which would be subject to the highest CIL charge) indicated that he believed that the appraisal assumptions used by the Council are reasonable.
19. I conclude, therefore, that the charging schedule is, as a whole, supported by appropriate available infrastructure planning and economic viability evidence.

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

The proposed CIL rates for residential development

Zone 3

20. The appraisal evidence to December 2016 indicates that development on a number of the Local Plan strategic housing sites (Crab Hill, Monks Farm, Grove Airfield, East of Coxwell Road, Land South of Park Road, South of Faringdon, North of Shrivenham and Didcot Power Station) would not viably be able to pay CIL when assessed against the three tests detailed above. Whilst Table D of the Council's Hearing Statement shows that some of the sites could, in theory, pay some CIL this would be reduced to a de minimis level on the application of an appropriate viability buffer. The inclusion of these sites in the Zone 3 (£0) CIL charge is therefore consistent with the evidence.
21. In the light of consultation comments on the December 2016 appraisal evidence, the Updated Regulation 123 list and Updated draft CIL schedule, the Council has undertaken further appraisal work in respect of the Valley Park strategic site. This reflects higher than previously-assumed ongoing s106 costs and updated sales values, based on the neighbouring Great Western Park scheme. This work demonstrates that, allowing for a suitable viability buffer, this site also could not viably pay a CIL charge. The Council has therefore now proposed that Valley Park is also included in the zero rated, Zone 3. To ensure consistency with the evidence, a modification of the draft schedule (**RM1**) to effect this change is consequently necessary. This modification requires the amendment of the schedule's Map 5 to show the Valley Park site within charging Zone 3.

Zones 1 and 2

22. The various iterations of the appraisal evidence have demonstrated that, broadly, development in and immediately around Faringdon, Wantage and Grove has a lower value (and is thus less able to viably pay CIL) than in the rest of the district. On this basis the draft schedule's identification of two residential CIL rates (in addition to the zero rate for some strategic sites) is supported by the evidence – a lower rate for Faringdon, Wantage and Grove and a higher rate for the rest of the district. Based on the appraisal's three tests, the higher £120 psm (Zone 1) rate and the lower £85 psm (Zone 2) rate are justified. Tables C and D of the Council's hearing statement also show that all the strategic housing sites which are not zero rated for CIL and all the smaller residential schemes appraised would not be subject to a CIL charge exceeding in the order of 25% of the maximum CIL rate demonstrated to be viable. Consequently, accounting for an appropriate viability buffer, the £120psm and £85psm CIL rates are supported by the evidence.
23. The County Council contends that the March 2017 Updated Regulation 123 list should be revised to identify s106 as the method of funding for primary school expansion in connection with development of the Milton Heights strategic housing site. This is primarily a matter for the District Council but it has confirmed (para 4.16 of its Hearing Statement [doc STAT1]) that the evidence shows that, even if this infrastructure is funded by s106, the Milton Heights development could viably pay the proposed £120 (Zone 1) CIL rate.

24. On a number of counts it has been argued that the Kingston Bagpuize, South of Kennington and East of Sutton Courtenay strategic sites should be zero-rated for CIL. Appraisals have been submitted to justify this using assumptions differing from those employed by the Council. However, as indicated above, I am satisfied that the Council's appraisal assumptions are, in principle, reasonable, and I am not persuaded that any of these alternative assumptions would, fundamentally, be more appropriately used to appraise these specific sites. On this basis appropriate available evidence demonstrates that these sites can viably pay the proposed £120 (Zone 1) CIL charge. It is also argued that s106 agreements are the most appropriate mechanism for collecting contributions for strategic sites. However, as long as the necessary infrastructure is accounted for, whether this is funded by s106 or CIL is a matter for the Council and its Regulation 123 list, rather than this Examination. Moreover, even if some or all the necessary infrastructure for a particular development site is secured by s106 agreement, the development would still be liable to contribute towards CIL for infrastructure elsewhere in the District if it could viably do so.

Specific types of residential development

25. Whilst not initially appraised, the December 2015 Viability Update [doc EXAM2] specifically considered student accommodation, in the form of cluster flat schemes of 175-rooms and 500-rooms. Table 6.6 of this document demonstrates that, based on the three viability appraisal tests, such accommodation could viably pay the maximum proposed £120 psm CIL charge and there is little persuasive evidence to demonstrate that this would not be the case. The draft schedule of December 2016 (doc CIL12] is clear that student accommodation would be charged CIL. Whether or not Charitable Relief would apply to such schemes is a matter for interpretation of the Regulations and not something appropriately addressed in the charging schedule.
26. It is the case that residential development of 10 – 40 units has not been specifically appraised although equally there is not detailed evidence to convincingly demonstrate that such schemes could not viably pay the proposed CIL charges. Moreover, the significant viability buffers employed in setting the CIL charges would allow for the costs of such development to be higher or the values lower than for larger or smaller scale residential development and for the development to still be viable with the proposed CIL charge.
27. Similarly, accommodation for services families and private rented sector housing has not been specifically appraised. However, there is no local policy basis for requiring development to be restricted to these types of accommodation and nor is there any detailed evidence to indicate that they would not viably be able to pay the proposed CIL charges. Detailed appraisals have been undertaken of sheltered housing (updated to March 2017, Tables E and F of the Council's hearing statement [doc STAT1]) which demonstrate that, notwithstanding sheltered housing's different costs and values from mainstream residential accommodation, in terms of the appraisal's three standard tests the proposed CIL charges could be viably paid in connection with such development.

28. The 2010 CIL Regulations, as amended, require that CIL is not charged for most affordable housing. Local Plan policy CP25 allows for an element of market housing on affordable housing rural exception sites insofar as it is necessary to make the development viable. As a matter of definition, therefore, such development could not viably pay CIL and it is therefore appropriately subject to a specific £0 charge in the schedule.

Extracare Residential Development and Nursing/Care Homes

29. On most measures (the maximum of amount of CIL payable, CIL as a percentage of Gross Development Value and CIL as a percentage of Residual Value) the most recent appraisals (March 2017) demonstrate that Extracare residential development is generally less able to viably pay CIL than mainstream housing development, particularly outside the Abingdon and Northeast area of the district. It is particularly notable that the additional profit (ie maximum CIL payable) for all four of the locations appraised for Extracare development (which is between £55 psm and £290 psm, assuming a policy-compliant 35% affordable housing requirement) is less than the £308 psm additional profit which is the minimum level at which the Council is proposing charging CIL for mainstream residential development. Indeed, in these terms, the Council's intention to charge CIL for Extracare development is arguably at odds with its proposal to zero rate for CIL four strategic housing sites with additional profit levels within the same £55-£290 psm range.
30. Moreover, with an additional profit of £55 psm, the Council's own appraisals demonstrate that Extracare development on brownfield sites in Southeast and Western Vale could not viably pay the proposed £85 and £120 CIL charges in these areas. I find the Council's contention that it is unlikely that Extracare development will come forward on brownfield sites to be unpersuasive; at the hearing the Council, themselves, stated that more than half the applications/pre-application discussions it has received in connection with Extracare development in the last two years or so have been on brownfield sites. Furthermore, other than on the strategic housing sites (on which there is no clear evidence that Extracare residential development will definitely come forward), the Local Plan provides little opportunity for greenfield residential development. Consequently, it seems to me that it is as, if not more, likely that Extracare development will come forward as redevelopment of brownfield sites than on greenfield land. It is therefore of concern that the evidence shows that in the Southeast and Western areas of the Vale (where the majority of the district's housing is proposed to come forward) the proposed CIL charges would be likely to render brownfield Extracare residential development unviable.
31. It is the case that on brownfield sites in the Abingdon/Northeast area and on greenfield sites throughout the district the Council's evidence demonstrates that Extracare housing could, in theory, viably pay the proposed CIL charges. However, as indicated above, there would be a much smaller buffer between the CIL charge and the maximum CIL payment shown to be viable than exists for other residential development. My concerns about this are exacerbated by the fact that many of the assumptions underlying the Council's Extracare development appraisals have been challenged to a significant and detailed degree. As already indicated, there is usually no single right or wrong answer in relation to appraisal assumptions. However, bearing in mind the challenged

assumptions, the cost of Extracare development on greenfield sites in the South East and Western Vale would, in reality, have to be only marginally higher than the Council's assumptions and/or its value marginally lower for the £120 psm CIL charge proposed in most of these areas to render such development unviable.

32. In summary, having regard to the likelihood of Extracare development coming forward on brownfield sites, the credible challenge to many of the assumptions underlying the Council's Extracare development appraisals and the much smaller viability buffer which has been allowed for in setting the CIL rates for Extracare development, there is a significant risk that the proposed CIL charges could render such development unviable. The CIL charges in this respect are therefore not supported by the evidence.
33. In terms of setting an alternative rate, based on the Council's appraisals but allowing for an appropriate buffer, only a negligible CIL charge would be viable for Extracare development in the South East and Western Vale, allowing for it to come forward on both brownfield and greenfield sites. On the same basis a higher, but still modest, CIL charge would in theory be viable on greenfield and brownfield sites in the Abingdon area, but it would inappropriately complicate the schedule to set a specific rate for Extracare development in this area alone. Moreover, in the light of the challenges to the assumptions employed, these appraisals potentially overestimate the viability of Extracare development. Consequently, in the light of all the available evidence, I recommend (**RM2**) that the schedule is modified to set a £0 CIL charge for Extracare residential development. The necessary definition of Extracare development, included in the modification, which references the key aspects of nursing and personal care provided by such development, is based on discussion at the hearings and I am satisfied that it is appropriate and workable.
34. Under the December 2016 draft CIL schedule Nursing/Care Homes would be subject to the standard residential development CIL charges, although the Council has subsequently proposed excluding such development from a CIL charge. Nursing/Care homes have not been specifically appraised by the Council. Bearing in mind their likely similarity (in terms of the costs of development) with Extracare housing, the absence of any specific evidence to demonstrate that CIL could be viably paid by Nursing/Care Home development and the clear undesirability of such uses being rendered unviable by CIL, I concur with the Council that the evidence points to zero rating for CIL Nursing/Care Homes which provide the same key aspects of nursing/personal care as Extracare residential development. Consequently, modification of the schedule in this respect (also included in **RM2**) is also necessary.

The proposed CIL rate for retail development

35. The appraisals (Tables 3.15 and 3.16 of the October 2014 Viability Study [doc CIL07]) demonstrate that across the district a CIL charge of £100 psm could be viably paid in respect of Supermarket and Retail Warehouse development; the minimum additional profit (out of which CIL would be paid) being more than three times the £100 psm charge. I understand that the appraisals were not based on a specific definition of these types of development but on a "common understanding" of the terms. The definitions of supermarkets and

retail warehouses set out in the December 2016 draft schedule have therefore, in effect, been 'retro-fitted'. Consequently, I cannot be certain that a CIL charge for a retail development falling within these particular definitions is supported by the appraisal evidence. Moreover, the definitions are of limited usefulness in any case and contain ambiguities, in particular that for retail warehousing; it is entirely unclear what would and would not constitute a "large" store.

36. In response to the discussion at the hearing on these matters, during which no workable alternative definitions emerged, the Council indicated its preference to remove the definitions of supermarkets and retail warehousing from the schedule. I concur that this is the most appropriate way forward and would enable decisions on whether or not a specific development is a supermarket or retail warehouse to be made on a case by case basis having regard to the common understanding of the terms, in line with the appraisal evidence. Whilst this approach could result in disputes as to what is and is not a supermarket/retail warehouse, I envisage that such disputes would be likely even if the schedule were to include the proposed definitions, given their ambiguity and other limitations. Consequently, I recommend (**RM3**) that the schedule is modified to remove the definitions of supermarkets and retail warehousing.
37. The evidence shows that other shops (as distinct from supermarkets and retail warehouses) could viably pay an absolute maximum CIL charge of £35psm, which, allowing for an appropriate viability buffer, would provide for only a negligible CIL charge. Moreover, the appraisal is based on the assumption that such development takes place on land of industrial value. I concur with the Council that it is most likely that such development would come forward as redevelopment of much higher value land, already in retail use. Given this, the evidence supports a £0 CIL charge for shops.

Other development

38. The October 2014 Viability Appraisal [doc CIL07] also considered industrial, office and hotel development which shows (Tables 3.15 and 3.16) that generally such uses would not be viably able to pay a CIL charge. Whilst some office development would be viably able to pay a small charge (eg in the Abingdon area) I agree with the Council that setting a charge for such development in this particular location alone would significantly complicate the charging schedule for minimal financial return. There is no evidence to indicate that any other form of development could viably pay a CIL charge and, thus, the intention to set a £0 for all other development is supported by the evidence.

Conclusion

39. Subject to the recommended modifications (**RM1**, **RM2** and **RM3**) the charging rates are informed by and consistent with the evidence.

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

40. Assuming that the CIL schedule is modified in accordance with my

recommendations, the evidence suggests that the sites and scale of development set out in the Local Plan would remain viable with CIL in place. Consequently, CIL would be unlikely to put the overall development of the area at serious risk.

Other Matters

41. It has been argued that the CIL schedule should set out requirements in terms of when infrastructure should be provided and fines if CIL liabilities are not paid. Whilst it is clearly important that infrastructure is provided at the appropriate time, this is fundamentally a matter for the implementation of Local Plan policy and the Infrastructure Delivery Plan. Matters of non-payment of CIL are covered by the relevant CIL Regulations. The sharing of CIL income with Parish Councils is also a matter controlled by the CIL Regulations.

LEGAL REQUIREMENTS	
National guidance	Subject to the recommended modifications, the Charging Schedule complies with national guidance.
2008 Act and 2010 Regulations (as amended)	Subject to the recommended modifications, the Charging Schedule complies with the 2008 Act and the 2010 Regulations, including in respect of the statutory processes, public consultation and consistency with the adopted Vale of White Horse Local Plan 2031 (Part 1) and Infrastructure Delivery Plan, and it is supported by an adequate financial appraisal.

Overall Conclusion

42. I conclude that, subject to the modifications set out in Appendix A, the Community Infrastructure Levy Charging Schedule for Vale of White Horse District Council 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.

Malcolm Rivett

EXAMINER

Appendix A

Modifications specified by the Examiner so that the Charging Schedule may be approved

RM1, RM2 and RM3 are effected by:

- replacing Table 1 of the Proposed (Updated December 2016) Draft Charging Schedule [doc CIL12], ***Proposed Charges by Development Type and Location (£ per sq m)***, with the following Table;
- deleting Table 2 of the Schedule, ***April 2015 (now superseded) Draft Charging Schedule – Proposed Charges by Development Type and Location (£ per sq m)***; and
- replacing Map 5 of the Schedule with the map set out below.

Table 1: Charging Schedule – Proposed Charges by Development Type and Location (£ per sq m)

Development Type	CIL Charging Rate (£ per sq m)		
	Zone 1	Zone 2 Faringdon, Grove and Wantage	Zone 3 Crab Hill, Didcot Power Station, East of Coxwell Road, Grove Airfield, Land South of Park Road, Monks Farm, North of Shrivenham, South of Faringdon and Valley Park Strategic Sites
Residential development (including student accommodation and sheltered housing)	£120	£85	£0
Development Type	District Wide		
Extracare, nursing and care homes ¹	£0		
Residential development which is required to enable a rural exception site under Core Policy 25	£0		
Supermarkets and retail warehousing	£100		
All other development	£0		

¹ Extracare, nursing and care homes that provide accommodation and ongoing nursing and/or personal care. Personal care includes: assistance with dressing, feeding, washing and toileting, as well as advice, encouragement and emotional and psychological support.

