

APPENDIX A

Variable Rate Tariff and Integrated Development Programme Issues Log v4 September 2009

This table contains all issues raised in consultation with partners regarding the CIL/ variable tariff and IDP, with responses regarding how they will be mitigated.

No.	Issue	Mitigation	Raised By	Progress
1	Need for agreed understanding of what is 'local' and what is 'strategic' infrastructure.	See page 6 of IDP for the broad categorisation of infrastructure used in the LTDP, HDC LIF and IDP. This will be discussed, to ensure that the correct, appropriate, and clearly understood categorisation is chosen by Local Authorities.	County Council & City Council & Huntingdonshire District Council & Fenland District Council & South Cambridgeshire District Council	Removal of local projects from IDP, as these will be captured in Local Infrastructure Frameworks
2	Concern regarding figures for recent S106 contributions collected by Cambridge City Council	Our consultants PricewaterhouseCoopers have confirmed that the figures used in the June 2009 Board report were inclusive of contributions to County-delivered infrastructure. However they were an indicative sample of recent S106 agreements, rather than a definitive picture of the total amounts collected.	City Council & South Cambridgeshire District Council	Liaison between CH and the City Council to explain provenance of figures
3	Need to ensure suitable governance arrangements for contributions to County-delivered infrastructure (education, waste, highways, etc) through tariff.	Work has been done and continues to agree governance arrangements for County-delivered infrastructure. A Tariff Governance Sub-group has been convened. This proposes that each district agree with the County Council a proportion of the tariff to be transferred, in order to deliver schools, waste, etc. This is likely to vary by district, so will need to be agreed with the County Council in each instance. However the basis for this agreement will be the evidence of infrastructure need	County Council & City Council & Fenland District Council & South Cambridgeshire District Council	Further discussions with County Council have taken place, agreement in principle has been reached.

		provided by the Local Infrastructure Framework, when complete.		
4	Potential that economic downturn will prevent tariff from collecting significantly more revenue than existing S106.	Whilst it is clear that the downturn has reduced developer profits and thus S106 contributions, this does not mean that new developments should be allowed to go forward without contributing to infrastructure. As the tariff will cover all housing development, rather than the approximately 60% now contributing, it will have a wider base than existing S106. Our analysis indicates that even during the downturn more will be collected. See Table 1 on page 4 for figures relating to collection at the lower-band tariff.	City Council	CIL is structured in order to collect revenue from a wider base than S106, with rates set on the basis of economic viability. This should ensure that more is collected than under individually negotiated S106.
5	Tariff must deliver streamlining and simplification of S106 process.	Given that major infrastructure elements that currently take considerable time and resource to agree will be taken out of the negotiation (education, community facilities, etc), the process will be streamlined. Moreover, smaller sites that may not have previously paid any infrastructure contribution would do so, but without a concomitant need for negotiations. The detailed governance arrangements for the tariff will be agreed so as to maximise these key benefits of a tariff approach.	City Council	Community Infrastructure Levy consultation document has been scrutinised, and initial analysis suggests that it appears to offer a simpler, quicker, clearer alternative to negotiated S106
6	Importance of accountability for how tariff monies are spent.	The tariff will allow increased accountability for local authority S106 spend, through the Business Plan. This document will not only set	City Council & South Cambridgeshire District Council	Community Infrastructure Levy includes reporting duties, improving accountability

		<p>out the operation of the tariff, but what is anticipated to be collected and what the monies will be spent on. Information on infrastructure needs will be drawn from the Local Infrastructure Frameworks (for local infrastructure) and the IDP (for strategic infrastructure). It will be owned by each district that adopts the tariff and regularly updated, as projects are completed and new priorities identified.</p>		<p>compared to S106</p>
7	<p>Structure of tariff must not impede other planning policy goals, for example affordable housing.</p>	<p>The tariff will in no way erode the right of elected councils to uphold their planning policies. It will not conflict with any adopted policy, indeed it will allow infrastructure to support sustainable communities to be more effectively funded. Planning committees will continue to determine planning applications exactly as currently occurs. Control of the spending of tariff will continue through existing channels for the local proportion and through established HGF procedures for the strategic proportion.</p>	<p>City Council & South Cambridgeshire District Council</p>	<p>In responding to the Community Infrastructure Levy consultation, ensuring delivery of affordable housing is not adversely effected will be a key theme.</p>
8	<p>Control of Local Planning Authorities over tariff contributions collected within their districts.</p>	<p>Local authorities will have the same control they already exert over local proportion of tariff contributions, assumed to be 80% on an indicative basis. Note that this 80% will in absolute terms very likely exceed 100% of equivalent negotiated S106 levels, as Table 2 on page 5 demonstrates.</p> <p>The intention of the strategic tariff element is support strategic</p>	<p>City Council</p>	<p>Community Infrastructure Levy will not change the level of control LPAs have over contributions. CIL will have a strategic element that will be dealt with as the mitigation sets out.</p>

		<p>infrastructure priorities that benefit the whole of Cambridgeshire. There is potential for cross-subsidy between districts; however, only if agreed by the partnership through the Growth Partnership Board and Horizons Board (as with Housing Growth Fund at the moment).</p>		
9	<p>Tariff should ensure affordable housing policies (for example 40% in Cambridge City and South Cambridgeshire) are viable.</p>	<p>Varying affordable housing requirements across the county were taken into account in the tariff Sensitivity Analysis (March 2009), and will be likewise be incorporated into tariff levels for adoption. The model developed by PricewaterhouseCoopers allows adjustment of affordable housing levels as necessary.</p>	<p>City Council & South Cambridgeshire District Council</p>	<p>Viability testing is required for a CIL Charging Schedule to be implemented. This will take into account levels of affordable housing.</p>
10	<p>Status of tariff within the planning system must be robust and clear.</p>	<p>The tariff will be implemented through Planning Obligations Supplementary Planning Documents, such as the City has already adopted. At the moment Huntingdonshire DC are most advanced in the preparation of a tariff SPD, following the completion of their Local Infrastructure Framework As a result, they are in a position to start piloting a tariff in 2010. Other districts, such as the City and South Cambridgeshire, are likely to start operating a tariff later, potentially in 2011.</p> <p>In preparing the Tariff Consultation Strategy, district Statements of Community Involvement will be fully complied with, to ensure that the consultation process is sound and PPS12-</p>	<p>City Council</p>	<p>The status of CIL within the planning system is described in the draft regulations.</p>

		compliant.		
11	Evidence base for tariff must be strong, in order for tariff to be defensible in case of challenge.	<p>The tariff evidence base will consist of Local Infrastructure Frameworks (as set out in Planning Policy Statement 12) and the Integrated Development Programme. The IDP draws on a range of existing work, including the Long Term Delivery Plan and ESD Carbon Appraisal. It is currently in draft, and a considerable amount of additional work will be done to develop it before it can go through Local Authority cabinet processes. This will include taking account of emerging LIFs being prepared by Local Planning Authorities. Once Local Authorities are satisfied that it is robust, the IDP can act as part of the tariff evidence base. The IDP will not itself be part of the Local Development Framework, and is not a policy document.</p> <p>Cambridgeshire Horizons will support the development of district Local Infrastructure Frameworks as appropriate.</p>	City Council & Fenland District Council	Progress has been made towards agreeing the IDP and completing Local Infrastructure Frameworks for all Cambridgeshire Local Authorities.
12	Tariff should not increase level of financial risk incumbent on Local Authorities.	<p>As the tariff will generate both a greater absolute level of revenue and more stable revenue stream, the level of financial risk incumbent upon Local Authorities will be reduced rather than increased. If tariff payments are to be delayed or phased, this will not cause any greater level of risk than is currently the case with negotiated S106.</p> <p>Indeed, increased levels of borrowing should become</p>	City Council	The CIL will have the same effect on financial risk as is set out in the mitigation for a tariff.

		possible as the tariff becomes established.		
13	Management of increased procurement and project management costs associated with collection of more development contributions.	This is a point that we have yet to fully consider, but will do so. The potential for a shared procurement hub to save costs has been suggested and will be followed up.	City Council & South Cambridgeshire District Council	This point is one we will emphasise in our response to the CIL consultation. County Council has begun an exercise to identify how processes might need to alter with the advent of CIL.
14	Premature to develop a tariff given political uncertainties and emerging Community Infrastructure Levy.	<p>The uncertainties of the economic downturn render it more important than ever that innovative funding solutions are investigated now. The prospect of a general election does not remove this challenge. Regulations for the Community Infrastructure Levy are expected in summer 2009. Moreover, looking ahead to a potential change of government, the Conservative Party have not proposed to scrap CIL, rather to review it. Their policy statements to date suggest a move towards locally-led funding schemes such as tariffs, as central government funds will be restricted for the next ten to fifteen years.</p> <p>Given that an LPA has already completed their infrastructure study and is eager to proceed with a tariff as soon as possible, it seems sensible to pilot the tariff. Once each district has an assessment of local infrastructure need, an adopted SPD and has approved the IDP, they can proceed to</p>	City Council	As the draft regulations for the Community Infrastructure Levy have now been issued, the Variable Tariff Steering Group have decided to shift the aim of the project to implementation through CIL. The draft regulations suggest that this would offer a much more robust legal basis for charging.

		operate the tariff.		
15	Clear timetable for tariff process needed.	This is being prepared, as timescales for Local Infrastructure Frameworks and Supplementary Planning Documents become clearer. This paper sets out a way forward for the tariff and IDP.	City Council	Huntingdonshire District Council intend to pilot the CIL, potentially in tandem with East Cambridgeshire. HDC are preparing a programme for this process.
16	Robustness and currency of IDP cost estimates.	<p>In response to concerns regarding cost and potential developer funding figures for the individual projects within spatial packages, we have removed this information. We understand that the spatial expression of the overall infrastructure funding gap can create an unfortunate and undesirable impression. However, as regards S106 negotiations, it is important to recognise that developer contributions will never fill the whole gap and a range of funding solutions require consideration.</p> <p>Regarding robustness of costs, the most recent figures available have been used. The Long Term Delivery Plan costs have been used where no updated work has been done. The ESD report, re-appraising the LTDP to take account of a low carbon future, has been incorporated.</p>	City Council	Please refer to mitigation. The IDP has also been updated to remove overlap with local infrastructure projects.
17	Distribution of costs/funding within the IDP.	It must be emphasised that the IDP does not allocate or distribute funding. It collects existing funding information, where such	City Council	Please refer to mitigation. The view of the steering group is that it is not

		<p>information is available. In relation to the spatial packages, it is noted that different levels of identified funding are stated for Northstowe, Cambridge East and Cambridge North West. This stems from the fact that these developments are each at entirely different stages. Those that have advanced further through the planning system naturally have evolved a greater understanding of their infrastructure requirements and how these will be funded. The allocation of funding is a policy matter outside the remit of the IDP. The level of funding currently identified for a package should not therefore be assumed to imply its 'allocation' across the whole funding period to 2021.</p>		<p>appropriate for the projects in the IDP to be prioritised at this early stage in any case, as this prioritisation would then be out of date by the time it was needed.</p>
18	<p>Lack of emphasis on sustainable travel within IDP.</p>	<p>Information on sustainable forms of transport, such as cycling, walking, rail and bus, has been included where available. As an example, projects within the Strategic Transport Thematic Package, in addition to sustainable transport measures in each spatial package. Where there are no costs attached to these projects, any such information available would be appreciated.</p> <p>Again, it is vital to note that the IDP does not allocate funding. It identifies projects and their current funding situation. The allocation of funding is a policy matter outside the remit of the IDP.</p>	<p>City Council</p>	<p>See mitigation.</p>

19	Insufficient treatment of climate change within IDP needs to be throughout.	Since this was raised much additional work has been undertaken to ensure the need for a low carbon future is reflected throughout the document. For example, greater emphasis on climate change has been incorporated into the preface, a section has been added on the green economy, the Climate Change Thematic Package has been extended, and an indicative 'carbon impact' has been added to each project.	County Council & City Council	See mitigation.
20	Lack of consultation on IDP.	It was felt that the IDP should be brought up to a workable state in partnership with EEDA and GCP before being shared more widely, as useful input would have been hard to give on a substantially incomplete piece of work. The IDP was brought to the Growth Partnership Board (6 th March) as soon as it had evolved into a cohesive document, and in advance of its presentation to JSGIC and the Horizons Board, to allow officer input. It has since been presented again to the GPB, as well as to the Economic Development Forum and Variable Rate Tariff Steering Group. The Horizons and GCP Boards have been kept updated on progress, and presented with the draft document in March. Further consultation at officer and member level will follow in advance of the IDP being taken to Local Authority cabinets.	City Council	See mitigation. Since June 2009, further detailed comments on the IDP have been sought from the steering group.

21	Lack of reflection of RSS review in IDP.	This has been added, see page 13.	County Council	See mitigation.
22	Relationship between IDP and East of England Implementation Plan is unclear.	<p>Cambridgeshire Horizons are making a joint response to EEDA's consultation on the draft Implementation Plan for the RSS and RES. This response will be informed by the IDP work to date.</p> <p>The East of England Implementation Plan covers the whole East of England region and brings together economic and spatial targets and aspirations. The IDP seeks to achieve the same in much more detail, covering only Cambridgeshire.</p>	County Council	A diagram setting out the regional, sub-regional, and local levels of infrastructure planning has been added to the IDP (page 13).
23	IDP is Cambridge-centric.	This is a function of the distribution of planned housing and economic activity, some level of focus on Cambridge being necessary to accurately reflect the growth agenda. However since this was raised we have sought to include more on the market towns, with input from district councils.	Huntingdonshire District Council & County Council	Further work has been done to enhance the coverage of market towns within the IDP.
24	Relationship between Local Infrastructure Frameworks and the IDP unclear.	<p>Local Infrastructure Frameworks are spatial planning documents, described in PPS12. They examine the infrastructure needed to deliver the development within a district over the plan period.</p> <p>The IDP is a higher-level document, looking at strategic interventions needed to deliver the RSS and RES targets for the county to 2021. It is important that LIFs and the IDP remain consistent and inform one</p>	County Council	See mitigation. The diagram added to page 13 of the IDP sets out the levels of infrastructure planning and how they support CIL/variable tariff.

		<p>another, however the two have differing emphases. LIFs are more detailed, whilst the IDP is more strategic.</p> <p>There may therefore be some overlap between the two in terms of infrastructure projects identified. However the IDP allows a strategic sub-regional view to be taken, whereas the LIFs can generate necessary detail on local community needs. Both LIFs and the IDP are part of the evidence base for planning policy.</p>		
25	Lack of prioritisation within IDP.	<p>The IDP now includes a chapter setting out the broad prioritisation approach, chapter 8. This is phasing-led, as the packages will not come forward on the same timescales.</p> <p>More detailed prioritisation is a sensitive issue, most appropriate for member discussion. This will take place before the IDP goes through Local Authority cabinets.</p>	County Council	The Steering Group have discussed this issue and agreed that it is not appropriate to conduct further prioritisation of the IDP until the CIL/Tariff proposals are further towards implementation. Priorities are likely to alter in the interim.
26	Lack of information on funding sources within IDP.	<p>The IDP identifies the overall level of currently unfunded strategic projects across the whole county, to which the strategic element of the tariff can contribute. It also examines potential innovative funding options to further address the funding gap. Where available, details of Housing Growth Fund, Community Infrastructure Fund, etc, allocations are included. If further funding information is available and appropriate for inclusion, it can be put in.</p>	County Council & Fenland District Council	See mitigation. A high-level analysis of funding sources has been added to the Executive Summary.

		More clarity on identified funding sources will be provided in a chart, which is currently being worked on.		
27	Economic interventions outside the Cambridgeshire boundary are not under control of Cambridgeshire organisations.	The Greater Cambridge Partnership have worked with us to develop the IDP, and lead on this aspect. Interventions outside the county boundary are included in Annex A of the IDP, for reference.	County Council & South Cambridgeshire District Council	See mitigation. It is made clear in the IDP that these interventions are outside Cambridgeshire and therefore will not be able to receive support from Cambs CIL/ variable tariff.
28	How IDP will be kept updated.	The IDP will need to be regularly reviewed in order to remain accurate. The process for this is under discussion but yet to be agreed. Further consultation with partners will be needed to find the right solution.	County Council	The method for updating the IDP remains under discussion, but it is likely that Cambridgeshire Horizons will take the lead on this.
29	Inclusion of strategic health in IDP	Although a strategic health thematic package has not been included, several projects are identified within the spatial packages. In the Southern Fringe package, the medical campus redevelopment, and in the Market Towns package the Hinchingsbrooke Hospital improvements. If further strategic health projects are identified they may also be included.	Huntingdonshire District Council	See mitigation.
30	IDP lacking cohesive vision	The IDP included the RSS and RES visions, and the Cambridgeshire Together vision has now been added to give an overarching vision.	South Cambridgeshire District Council	See mitigation.
31	Lack of linkage in	The IDP is focussed on the	South	See mitigation.

	the IDP to the LAA or the HCA Single Conversation	RES and RSS aspirations for Cambridgeshire, which are longer term than the LAA. Since this was raised, more has nonetheless been added to reflect the LAA targets and vision within the IDP. With regard to the Single Conversation, the IDP may form an important part of the evidence base to draw on for this, however the Cambridgeshire Prospectus will be the main document to inform communication with the HCA.	Cambridgeshire District Council	The LAA vision has been included in the IDP, as has additional reference to its use as supporting evidence for the Single Conversation.
32	IDP does not discuss Orchard Park	The value of including Orchard Park in the IDP was not clear, as it is an established site. However if required it can included, suggestions for appropriate text being welcomed.	South Cambridgeshire District Council & Cambridgeshire County Council	See mitigation.
33	Tax Increment Finance and Accelerated Development Zones not mentioned in the IDP	This has been added, see page 5 of the IDP.	South Cambridgeshire District Council	See mitigation.
34	Ownership of the IDP is unclear	To date the IDP has been worked up by Cambridgeshire Horizons and the Greater Cambridge Partnership, with guidance from EEDA. Input from Local Authorities and other stakeholders has been gathered through the Growth Partnership Board, Economic Development Forum, and Variable Rate Tariff Steering group. At a higher level, the Cambridgeshire Horizons Board and Greater	South Cambridgeshire District Council	See mitigation. Once the IDP has passed through member processes in all Local Authorities, it can be approved by the Horizons Board as a fit-for-purpose element of the evidence base on infrastructure required to support the

		Cambridge Partnership Operating Board have discussed it. Once these two high-level Boards have endorsed the final IDP, they will own it.		growth agenda for Cambridgeshire.
35	Clear methodology for drawing down prioritised investment needed	The IDP does not include a specific programme of work for generating investment, however this may be considered for future inclusion is appropriate.	South Cambridgeshire District Council	See mitigation.
36	Analysis of investment cost per dwelling needed, to show best return	Such analysis may prove too simplistic for the IDP, given that number of new houses is not the sole target of the RES and RSS for Cambridgeshire; economic development and sustainability outcomes will also need to be considered. The prioritisation of projects within the IDP will be led by phasing, as set out in chapter 8.	South Cambridgeshire District Council	See mitigation, refer also to issue 17.
37	Tariff not sufficiently mentioned in IDP	The IDP will form part of the evidence base on infrastructure need, informing work on the tariff. This is set out in the Introduction, but further reference can be added.	South Cambridgeshire District Council	A diagram setting out the regional, sub-regional, and local levels of infrastructure planning and how they will support CIL/Variable Tariff has been added to the IDP (page 13).
38	Specific information needed for each package, including scale of viability gap, facilities to be provided, etc	Where specific information on facilities to be provided is available, it has been included in the IDP packages. Some sites have not yet advanced through the planning process sufficiently for this to become clear. Regarding viability gaps,	South Cambridgeshire District Council	See mitigation.

		<p>this is a sensitive issue. Where such gaps exist, their size is generally a matter of commercial confidentiality. Estimating viability gaps for each package would be highly contentious. Instead, the IDP can identify the level of currently unfunded strategic projects across the whole county, to which the strategic element of the tariff can contribute.</p>		
39	<p>Tone of the IDP does not match planning policy documents</p>	<p>The IDP is not a planning policy document, it is a piece of evidence to inform policy choices. For these purposes it does not seem inappropriate, however specific phrases that caused discomfort have been removed. Where statements within the document are not backed up with references, these will be added.</p>	City Council	<p>The IDP has been produced to be a fit-for-purpose element of the evidence base on infrastructure required to support the growth agenda for Cambridgeshire. It will support planning policy, for example a CIL charging schedule, but is not a planning policy document in itself.</p>

40	Percentage split of 80/20 has been assumed in favour of local infrastructure, does this reflect infrastructure plans	<p>The Huntingdonshire Local Infrastructure Framework in fact suggests of the infrastructure costs to 2026, 81% are strategic and 19% local. However, when projects funded by central government are stripped out (removing a total of £1,505,700,000 for trunk road upgrades and strategic health), this shifts to 88% local and 12% strategic, as shown in figure 4. It should be noted that this is not definitive as it does not take full account of IDP projects.</p> <p>The 80/20 split is suggested as indicative, the final figure will be agreed by reference to the whole suite of Local Infrastructure Frameworks and the IDP.</p>	Huntingdonshire District Council	See mitigation. The final split will be agreed once further work on CIL has gone forward, including completion of Local Infrastructure Frameworks for all districts and the City.
41	Need for clear idea of residual unfunded infrastructure for which tariff could be collected, both in IDP and Local Infrastructure Frameworks	<p>We are actively working on this for the IDP, and encouraging inclusion of such analysis in LIFs. Figure 5 sets out this split within the IDP, with 38% of costs nationally funded (trunk roads, rail infrastructure & strategic health), 36% building costs associated with zero carbon from 2016 (to be absorbed by developers), and 1% funded through other means (Housing Growth Fund, Community Infrastructure Fund, etc). The IDP residual is therefore approximately 25%, or £1,508,980,000.</p>	Huntingdonshire District Council	See mitigation, this will continue to be monitored.
42	Will tariff cover commercial development	<p>The view so far has been to focus on housing development for the tariff, and analysis to date has been on this basis. However there are precedents for commercial</p>	Huntingdonshire District Council & East Cambridgeshire District Council	CIL will apply to all buildings (barring those into which people do not normally go, with a de

		development to also be subject to a tariff approach, and this could be investigated in the future if there were agreement to do so. In the interim, commercial development can continue to be subject to negotiated S106 once the tariff is operational for housing, in order to ensure they contribute fairly.		minimis threshold). This includes commercial developments. However if a levy on such development is considered unviable, a nil rate can be set.
43	How will the tariff deal with land costs associated with infrastructure, for example when the developer supplies land	Advice is being taken on how other tariff systems have approached this issue. A clear, defensible approach will need to be developed, and further discussions will take place to develop this. One approach suggested has been to allocate school sites rigorously, to ensure they have no other developable value.	Huntingdonshire District Council	CIL does not provide for any reductions in contribution if land is provided by the developer. The provision of such land would continue to be handled through Section 106. The lack of guidance on this in the consultation document will be raised as part of the response.
44	How will tariff indexation work	The level of tariff will need some form of indexation in order to address inflation. The details of this are still subject to discussion, including consideration of how other tariff systems have dealt with this. If it is felt that the methods currently used for indexing S106 contributions are robust, it may be possible to continue them.	Huntingdonshire District Council	The CIL consultation document proposes to index against construction costs on an annual basis. The charge will be indexed until planning permission is granted, rather than when construction starts. Comments on this will be included in the consultation response.

45	How would very large developments, for example Northstowe be dealt with under the tariff	The leading suggestion to date has been to use a bespoke tariff for such significant, strategic sites. This is due to the scale and complexity of their infrastructure requirements, which will require more detailed consideration than smaller sites. A bespoke tariff would be a compromise solution between the status quo of a fully negotiated S106 and the simple application of a tariff calculation. It should be noted that to date CIL does not have such a provision and would treat very large sites in the same way as smaller ones. A bespoke tariff might also reduce the speed and predictability of the tariff for larger sites.	Huntingdonshire District Council & HCA	CIL does not have an upper limit for sizes of development that it covers. However the residual Section 106 for larger sites would of necessity be more complex, due to a greater quantity of site specific mitigation required. The same level of CIL would be applicable per unit of floorspace.
46	Will IDP packages be agreed with Local Authorities	Yes, they will be agreed in order that the IDP can be endorsed by the Horizons Board and Local Authority Cabinets in due course	Fenland District Council	See mitigation. Packages will be agreed as part of the process of the IDP going through Local Authority cabinets (or equivalent group) between September and December 2009.
47	How will land value capture be agreed with Local Authorities	The eventual level of tariff for each Local Authority will be chosen after more detailed housing market analysis. The initial levels for each LA will be set through their Supplementary Planning Document, and therefore subject to suitable consultation.	Fenland District Council	The CIL consultation proposes that the rate (or rates) of charge be determined through viability testing. The charging schedule will then be assessed by an

				independent inspector.
48	How will revenue contributions be dealt with under the tariff	The treatment of revenue has not been agreed to date, and will require further discussion. Revenue needs should be taken into account in the preparation of Local Infrastructure Frameworks, giving an evidence base to collect contributions for them. Whether these contributions will be included in the tariff or left in the residual negotiated S106 is still to be agreed.	South Cambridgeshire District Council	As the definition of infrastructure for which CIL can be used is not intended to be exhaustive, use of CIL for revenue contributions seems feasible.
49	How will external organisations, eg wildlife trusts, input into the tariff process	External organisations will need to be engaged in the preparation of Local Infrastructure Frameworks, as these will form a key evidence base for the tariff.	South Cambridgeshire District Council	See mitigation.
50	What metric will be used to charge tariff	The model developed by PWC allows tariff levels per unit or by floorspace. Either metric could be used. Whichever is chosen will have some influence on size/nature of units, however developers' choice of what size of unit to build is determined by what they consider will sell. Further discussion on this will be needed.	HCA	The metric proposed in the CIL consultation document is gross internal floorspace, as this is applicable to all new buildings and relatively simple to use. Comments on the impact of this will be included in the consultation response.
51	How will affordable housing be dealt with under the tariff	Discussion to date has suggested that developments of all affordable housing should be exempt from the tariff, whereas sites with a mixture of market and affordable should pay tariff on all units. This approach intends to ensure that affordable housing delivery	HCA	The CIL consultation document suggests exemption from CIL through charitable status and development for charitable purposes. This

		is not adversely effected by the tariff, however it will require careful calculation of the infrastructure needs of the affordable units not contributing tariff and structures for these needs to be met. Further discussion will be needed to finalise this approach and ensure that the tariff is consistent with affordable housing policies in each district.		exemption seems on balance to be suitable, as a blanket exemption for affordable housing could cause perverse incentives for developers to deliver smaller, all-affordable housing schemes, reducing delivery overall. Further comments on this will be included in the consultation response.
52	How will site specific works 'within the red line' be dealt with under the tariff	Under the Community Infrastructure Levy it is currently envisaged that site specific works will remain part of the residual S106 or a condition. This approach becomes more challenging for larger sites with high levels of onsite infrastructure, and this will need to be carefully managed. A precise view will need to be agreed on exactly what the tariff can and cannot include.	East Cambridgeshire District Council & HCA	Under CIL, site specific mitigations will continue to be dealt with under Section 106. However the five tests within Circular 05/05 will be made statutory to ensure that the roles of Section 106 and CIL are clearly delineated.
53	How will tariff fund be held and invested	The strategic tariff fund will be held by the County Council and managed by the tariff partnership. It is anticipated that this will occur through existing structures for managing Housing Growth Fund. Investment decisions will therefore be collectively made through this partnership.	HCA	See mitigation, the same structures would appear to be appropriate for a CIL system.

