

We support the introduction of a CIL and would like to make the following points.

- We think a charge per square metre preferable as a CIL charged at, say £10000 per dwelling would encourage the development of larger, more expensive houses. A charge per square metre would help ensure developers build across the price range.
- A differential CIL cost between green field and brown field sites with strict criteria would ensure that local brown field sites would be brought on line.
- The revision of viability data para 2.14 indicates a constantly changing scene with regard to land and property values. Clearly values had fallen over the period of the two assessments but could equally rise as much over the forthcoming period before properties are brought to market in the EUDP and other Tiverton development areas.
- Given the vast increase in the area of Tiverton that the EUDP would create it seems unreasonable to expect the present residents to bear the burden of the £60 million infrastructure costs in additional rates and charges for the benefit of land owners, developers and a new inwardly mobile population.
- A £10000 CIL charge per property is only likely to raise £35 million (para 2.8) with £25 million from other sources. One wonders who or what are these other sources and one might conclude that a significant part of it might fall on local businesses or current residents.
- Para 2.16 suggests a schedule level of £156 per metre squared would be viable. The average (88m<sup>2</sup>) being charged at £113 per m<sup>2</sup> to provide £10000 per dwelling would be 'well within the bounds of viability for green field sites.'
- Para 3.1 a CIL of £90 per m squared which is well below the £113 figure and further erodes the £35 million given in para 2.8. We considered this £90 figure is set too low.
- The proposed 'nil' charges for non-residential development would appear to add further burden on local council tax payers. Large businesses are pressing for an opportunity to locate at Junction 27. It is hard to believe that a reasonable CIL charge would discourage them.
- Provided the CIL charges are clearly set out then developers can take these into account to ensure the viability of their projects when development land is purchased.
- It is essential that the Council has the scope to raise or lower the CIL to keep pace with local market conditions.
- The astute use of CIL could give planners leverage to encourage businesses to locate in Tiverton Town Centre.

We request to be notified of items a, b and c in your letter of the 20<sup>th</sup> July 2012