
Report to Lambeth London Borough Council

by Terrence Kemmann-Lane JP DipTP FRTPI MCMI

an Examiner appointed by the Council

Date: 19 May 2014

PLANNING ACT 2008 (AS AMENDED)
SECTION 212(2)

REPORT ON THE EXAMINATION OF THE DRAFT LAMBETH LONDON BOROUGH COUNCIL COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE

Charging Schedule submitted for examination on 22 November 2013

Examination Hearing held on 25 and 26 February 2014

File Ref: PINS/N5660/429/6

Non Technical Summary

This report concludes that, as submitted, the London Borough of Lambeth Community Infrastructure Levy Charging Schedule does not fully provide an appropriate basis for the collection of the levy in the Borough. The proposed rates for student accommodation and hotel developments rely on assessments which have been shown not to be sound, but with modifications which will not put developments at risk, can be recommended for approval.

Two modifications are needed to meet the statutory requirements. These can be summarised as follows:

- Reduce the Community Infrastructure Levy (CIL) Rate for student accommodation from £360 to £215 per square metre;
- Reduce the CIL Rate for hotel development in Zone A from £250 to £100 per square metre, and for Zones B and C to Nil.

The specified modifications recommended in this report are based on matters discussed during the public hearing session and do not alter the basis of the Council's overall approach or the appropriate balance achieved.

Subject to the modifications set out in Appendix A, the Charging Schedule would provide an appropriate basis for the collection of the levy in the Borough.

Introduction

1. This report contains my assessment of the Lambeth London Borough Council Community Infrastructure Levy (CIL) Charging Schedule 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 (Community Infrastructure Levy Guidance, DCLG, February 2014)
2. To comply with the relevant legislation the local charging authority has to submit what it considers to be 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 draft Charging Schedule was first published in June 2013. However, as a result of comments which I made during my initial preparation, the Council issued an amended version dated October 2013 to correct some typing errors, to lay out the Rates schedule more clearly and to respond to representations made about the clarity of the map of charging zones. These amendments made no changes to the CIL rates proposed.

4. In November 2013 the Council published a Statement of Modifications which formalised the amendments which had been shown on the October version, the most important of which I consider to be that the titles of the Zones were amended to omit reference to Residential Zones, so that they became simply Zone A, Zone B, etc, and to amend the title of the map from "Residential and Hotel development Charging Zones" to "Charging Zones map". This was to reflect the fact that the zones were never restricted to just residential or residential and hotel development. Again, the rates were not changed. The Statement of Modifications was subject to the required consultation. This became the submission Schedule.
5. On the first day of the hearings, 25 February 2014, the Council presented me with a Schedule that had been amended to take account of the changes made to the CIL Regulations, which came into force on 24 February 2014. I questioned the Council about the legitimacy of this, in particular whether there ought to be a period of consultation. At the hearing session the following day a considered response was given to me by the Council's Legal Services. I consider that it is worth providing a brief résumé of this response:

The Council wished to ensure that the narrative in its draft charging schedule was brought up to date in the light of the 2014 amendments to the CIL Regulations, in particular to reflect the introduction of additional reliefs and exemptions. No change to the material or operative parts of the draft charging schedule – the proposed rates of CIL, or the area designations – has been proposed by the Council.

The Council does not consider that any re-consultation would have been required on the amendments put forward on 24 February 2014 as they are purely corrective and/or updating in nature, are in no way substantive, and relate only to information that the Council has chosen, voluntarily, to include in the draft charging schedule in order to alert users of the document to the potential availability of reliefs and exemptions.

These changes have no bearing on the content of the examination. They would not amount to matters for the Examiner in any event, since they concern only the Council's summary of the legal effect of the CIL Regulations.

6. I accept this explanation, and in addition I can see advantage in the Council adopting its charging schedule containing reference to the potential availability of reliefs and exemptions. Particular examples of this are the exemption or scope for relief for "Development of dwellings which are sold for no more than 80% of market value" (discounted market value) and student accommodation at submarket rent levels, which I refer to at paragraphs 20 to 23 below. Thus it is the amended draft Charging Schedule dated February 2014 that is the subject of this report.
7. In respect of charges for Residential, Hotel, and Office developments, the Council propose a matrix approach with the Borough divided into three Zones (A, B and C) based on viability alone and defined on an OS map base as required by the CIL Regulations. The rates for residential development are

£265 in Zone A, £150 in Zone B and £50 in Zone B. For hotel development, the Zone A charge is £250, and for Zones B and C £100. For office development the Zone A charge is £125 and Nil in Zones B and C. In respect of Large Retail development and Student Accommodation the rates are £115 and £360 respectively, these charges applying across the whole of the Borough.

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

Infrastructure planning evidence

8. The Lambeth Core Strategy (CS) was adopted in January 2011. This sets out the main elements of growth that will need to be supported by further infrastructure over a fifteen year period. Annex 2 to the CS sets out the Infrastructure Programmes and Schedule which identifies known infrastructure requirements, and sets out the phasing of delivery, estimated cost and current funding position for each project, where the information is available. As part of the infrastructure planning evidence base for the Charging Schedule, the Council's consultants have produced an updated Infrastructure Delivery Plan (IDP), the latest dated November 2013.
9. The updated IDP identifies that there are 132 projects from 12 infrastructure categories, of which 130 projects are CIL eligible. Of these, 69 have been costed, with a total cost of circa £862m. With an expectation that the Council will review its CIL Charging Schedule within a period of three to five years, it was decided that the funding gap should be demonstrated over a period of five years – which is also the period with the most accurate estimates of funding. Within this period there are 104 projects of which 102 are CIL eligible and 70 of these have been costed. The total cost of these 70 projects is circa £721m – set out in some detail in the updated IDP. The aggregate funding gap, the total cost of infrastructure minus funding from other sources, is found to be £201.2m.
10. The updated IDP also calculates projected CIL income, based on the proposed CIL Rates. For the period 2014 – 2018 the total CIL income is anticipated to be £32.6m. The resulting residual funding gap can be calculated as circa £168.6m. In the light of this information, the proposed charge would therefore make a modest contribution towards filling the likely funding gap. The figures demonstrate the need to levy CIL.

Economic viability evidence

11. The Council commissioned a CIL Viability Study (VS) from consultants experienced in this type of work. The first assessment dated August 2012 was updated in April 2013, taking account of consultation responses following the publication of the Preliminary Draft Charging Schedule. An Addendum Viability Report was produced in November 2013 which addresses representations in relation to hotel, student accommodation, and supermarket developments.
12. The VS uses a residual land value method, using reasonable standard assumptions for a range of factors such as building costs, profit levels, fees,

various CIL levels (and includes Mayoral CIL), etc. Where appropriate the Council's policy for affordable housing has been taken into account. Sensitivity analyses have been incorporated in both housing and commercial appraisals.

Conclusion

13. The draft Charging Schedule is supported by detailed evidence of community infrastructure needs and a funding gap has been identified. Accepted valuation methodology has been used which was informed by reasonable assumptions about local sale prices, rents and yields. In general the Council produced a sufficient amount of evidence to inform conclusions about the impact of the proposed CIL on the viability of a number of development scenarios. However, there were some shortcomings with regard to the student housing and hotel appraisals, which I consider in more detail below. The evidence which has been used to inform the Charging Schedule is proportionate, appropriate and, in most instances, robust.

Is the charging rate informed by and consistent with the evidence?

CIL rates for residential development

Residential Development Generally

14. Representations include the contention that the VS is inadequate and a plea to reduce the CIL rate for residential development, particularly the highest rate which it is said would impact on land supply and delivering homes in the most sustainable locations. No evidential basis is provided to back these claims and therefore I find them unsubstantiated.

Student Accommodation

Is the charging rate for Student Accommodation at market rates based on reasonable assumptions about costs of development? Should the Charging Schedule differentiate Student Accommodation intended to be let at sub-market rents from "market" accommodation, applying a Nil rate?

15. There are two forms of student housing about which representations have been made: 'nominated' (where the institution provides housing for its own students) and 'direct let' (where student housing is provided on a commercial basis, not linked to any particular institution). In addition, student housing can be let at submarket levels. As a result of representations, the Council commissioned an Addendum Viability Report (AVR) (November 2013) which addresses the main points made in respect of student housing (and also Hotel and retail development).
16. I begin with consideration of nominated and direct let student accommodation at market rents. There is criticism of the VS in respect of inputs relating to build costs, and the absence of allowances for purchasers' costs and disposal costs. For building costs, the same figures are used in the VS of August 2012 and April 2013, but for the AVR of November 2013 building costs are lower by circa 22%. Having explored this discrepancy at the hearing I remain sceptical about the accuracy of the November 2013 AVR figures (displaying such a

reduction over just 7 months) and prefer the figures used in the two versions of the VS. As to purchasers' costs and disposal costs, representors explain and provide evidence that the majority of student accommodation schemes are sold on the open market, and that, even those which are transferred to a fund of the same institution name will be required to pay these costs – for instance Stamp Duty Tax and VAT are government imposed taxes and apply on any transaction. To counter this the Council suggests that developer-operators will need to structure their internal arrangements differently to avoid such costs. My view is that it is not as simple a matter as that, given such considerations as legal, accountancy and the need for transparency.

17. Arising from the discussion at the hearing and the written submissions, I conclude that the Council's CIL rate for student accommodation at market rents is higher than is justified on the basis of viability. Using the figures discussed in the submissions to arrive at a more realistic figure, I have taken the Development Appraisal for Student Housing in the April 2013 version of the VS and added within the Development Costs part of the table the following elements: contingency, Mayoral CIL and Legal fees from the November 2013 AVR. In addition I have used the 7% interest on construction costs, as in the AVR but on the construction costs in the VS. The result is that the per sqm (net additional floorspace) figure (shown as £553 in the VS becomes £330. Using a similar 'buffer' percentage to that used in the VS results in a CIL rate of £215 per square metre. This is the figure that I consider strikes the appropriate balance between helping to fund new infrastructure and the effect on the economic viability of this form of development. I am not satisfied that other inputs into the VS have been shown to be unrealistic so as to warrant other changes. I will recommend the figure of £215 as the revised CIL rate for student accommodation: a rate which should be applied to 'nominated' and 'direct let' student accommodation at market rents.
18. I now turn to consider student accommodation let at submarket rent levels. It seems to me that where the level of rent for student accommodation falls below market levels, similar to the submarket rent levels dealt with at paragraphs 22 and 23 below for "Market" Affordable Housing, a similar approach is warranted. It has been suggested that the Charging Schedule should set a Nil rate for student accommodation let at submarket rents, with a condition being imposed on the grant of planning permission for such accommodation which would seek to ensure that the building would be maintained in use at a submarket rental level.
19. Whilst the Council appears to accept that there is a case to be made for differentiating student accommodation at submarket rentals, it raises objections to this approach on the basis that such a condition would be unenforceable. This is because it is contrary to advice provided in National Planning Policy Guidance, March 2014, concerning the 6 tests on the use of conditions in planning permission. I agree with the Council for the reason given: the Council's comments (dated 5 March 2014) go on to say that affordable housing is invariably secured by the use of an agreement under s106 of the Town and Country Planning Act 1990 and sets out the reasons therefor. Again I agree with the Council, that even if the suggested condition were enforceable, it is not the appropriate route to secure submarket rent student accommodation.

20. I see no obvious and unequivocal way of differentiating such student accommodation let at submarket rents in the CIL Rates. However, the 2014 amendments to the CIL Regulations allow for exemptions and relief for additional forms of development. Exceptional circumstances relief can be considered where a section 106 agreement is in place as well as a levy charging schedule. A charging authority can give relief from the levy if it deems that the levy would have an unacceptable impact on the economic viability of a development, for which there is no statutory definition. The charging authority has the discretion to make judgements about viability of the scheme in economic terms.
21. From the point of view of Representors there is the drawback that the Council has a discretion which it may, or may not, exercise and therefore there can be no certainty that the Council will enable and continue such relief. So far as my report is concerned, this 'solution' is not one that I can recommend, and it is beyond my remit to suggest how the part of the Charging Schedule that has the heading 'Exemptions and Relief' might be amended. However, I would urge the Council to give consideration to this means whereby an equitable solution to the viability vulnerabilities of student accommodation at submarket rentals is in question. I cannot see any more positive means by which I can deal with CIL rates for this form of development

"Market" Affordable Housing

Should the particular characteristics of 'Market Affordable Housing' be recognised within the Charging Schedule?

22. 'Market affordable housing' is a form of private housing by a specialist developer – it appears that there is only one developer at present which operates this model. The model aims to sell at less than the market value without subsidy to developer or buyer. To date all such dwellings have been one-bedroom and have been sold at typically 80% of the price of other one-bedroom dwellings in comparable locations. The dwellings are sold with a covenant limiting subsequent resale, so that affordability is 'recycled'. Exemptions from the policy requirement to provide affordable housing have been negotiated.
23. Whilst I see the need to identify the viability issues which arise from this form of development, I see no obvious and unequivocal way of differentiating such private development in the CIL Rates. However, as I have remarked at paragraph 20 above, the 2014 amendments to the CIL Regulations allow for exemptions and relief for additional forms of development which includes "Development of dwellings which are sold for no more than 80% of market value (discounted market rate). This has now been incorporated into the Exemptions and Relief part of the Council's Charging Schedule and appears to me to satisfy the issue raised.

CIL rates for Commercial Development

Retail Development

Is there justification for differential charging of retail on the basis of a size threshold? Is the CIL rate for retail justified by the viability assessment?

24. Differential rates for large retail stores are a feature of many charging schedules and reflect a real difference in potential viability and operating features, where 280 square metres of net retailing space is often recognised as the point above which there is a marked change of circumstance. It is noteworthy that the principle of such differential charging for retail is now sanctioned in the Regulations as amended recently. As the Council has pointed out, a combination of factors identify the difference between large retail operations and those below the threshold. These include the availability and amount of car parking, the operational economics of large stores, high rents and the value ascribed by investment markets with lower yields being applied, and the large sites for such developments often having lower existing use values. Set against these considerations no evidence is put forward which persuades me that the differential in the retail element of the Schedule is ill founded. Similarly, no persuasive evidence is put forward that the rate for large retail development would impact on the viability of such stores in the Borough generally.

Hotel Development

Does the viability evidence support the proposed rates for hotel development? In particular, are the underlying assumptions correct?

25. In respect of hotel development, the VS is based on the recently opened Travelodge hotel in Vauxhall: one example of development in the Borough, even though the draft Charging Schedule differentiates CIL for hotels into two different charging levels across the three Zones. The AVR of November 2013 adds an additional appraisal for a budget hotel 'in a lower value area'. Representations criticise a number of aspects of the appraisal in addition to the fact that it is data from a single hotel development that has been used. These are the rent free period assumed, the assumed rent level, and the yield.
26. Responding to these criticisms, the Council points out that there is very little transactional evidence of hotels in the Borough, and that it has been necessary to rely on judgement as well as looking at capital values in other similar boroughs.
27. These matters were discussed at the hearing, at the end of which I asked for some additional clarification to be provided in writing. The outcome of subsequent exchanges can be briefly expressed in the following way.
28. For the Representor, the Council's retail and yield information for the Vauxhall example (of 6%) is accepted, but on the basis that it is very much at the upper end of any Central Activities Zone comparable that could have been used, and does not reflect the cautious approach which should be used. The Council's later claims that 5% yield should be used for hotel development throughout the Borough is misguided and based on unsatisfactory evidence: Focus reports (and EGI and CoStar) only contain headline facts, do not contain all detail, are unverified and can also be incorrect. Within Zones B and C yields upwards of 6% (6.25%-6.5%) should be used in such assessments.

29. In the VS, the floorspace has been underestimated by the Council which relied on incomplete website information, never intended to be used for valuation purposes, and the figures in the AVR continued this error. A later, post hearing edition of the assessment, used a correct figure, but the yield figure used in this latest assessment, at 5% for the whole Borough, is totally misguided. The floorspace correction affects the build costs (and modular build would be unlikely in a Central London Borough – which means the whole of Lambeth Borough), and in the AVR, and the later assessment which uses the larger floorspace, the build cost has been reduced from that used in the VS to an unrealistic level.
30. For the Council it is accepted that the floor areas should be adjusted, having had it drawn to its attention that the Travelodge website information is incorrect and having checked the planning documentation. However, at the same time, it is now contended that the yield has previously been taken at too high a figure (6%) and that sub 5% yields have been achieved in similar areas. This new yield figure has been extracted from a recent Savills report quoting two Premier Inns in Holborn and the City of London, and an Ibis in Brighton.
31. In respect of build costs, the Council refers to the Travelodge website where reference is made to modular build, pointing out that its viability figures are based on traditional build but that it is quite possible that this over-estimates build costs. In the latest submissions, two appraisals of hotels outside the central CIL zone have been undertaken, using the build cost from the VS (£157 psf) and then the build cost used in the later AVR (£135 psf); and a third appraisal using actual costs incurred by Travelodge on outer London developments.
32. Using the same build costs as the central London appraisal, the Travelodge model is unviable outside the central area, and will not come forward unless build costs are reduced. Using a reduced build cost, a re-run of the appraisal shows a maximum CIL rate would be £425 per square metre, and that the proposed CIL rate of £100 would therefore equate to 24% of the maximum rate, and is justified.
33. My conclusions on the Hotel CIL rate are as follows. I have already said that I find the building costs used in the November 2013 AVR difficult to justify in the face of the higher figures used in August 2012 and April 2013 and I note that the Council's response to my request for additional work at the hearing includes reference to the fact that the BCIS 'General Cost Index' has increased by 6% since July 2010. A reduced build cost based on a figure achieved in outer London is not acceptable on face value since costs are likely to be higher on an inner London site, particularly when substantial unforeseen cost may well arise in areas which are dense and have a complicated development history.
34. In addition, I prefer the evidence of the Representor concerning yields, based as they are on their own developments, particularly as it was a representor's development that the VR used as the single example for budget hotels. I cannot accept, on the evidence provided, that a yield of 5% should be applied to assessments of hotel development Borough wide. I conclude that the

evidence base is insufficient to justify a CIL rate within Zones B and C since it uses too low a yield, and on the Council's own submission such development would not be viable at a build cost which I consider is more realistic.

35. The situation in Zone A is less clear-cut, but I am not satisfied that the evidence supports a CIL rate of £250 per square metre. This is because I have not been given a revised viability assessment which simply adjusts the floor areas to the factually correct figure, whilst adhering to the VS build costs, and that assessment which I have been given uses a yield which, on the evidence, I do not accept. However, in my judgement, given the size of the funding gap in the Borough and the amount of work which has gone into the preparation and submission of the draft Charging Schedule, it is desirable that the Borough has a CIL rate for hotels incorporated into its Charging Schedule which would assist in the provision of essential infrastructure, even if this is at a lower figure than might be justified by further assessment studies. I conclude that the rate which is proposed for Zones B and C (£100 per square metre) could be safely used in Zone A without serious risk to the viability of hotel development in the area.
36. I will therefore recommend that the Rate for hotel development in Zone A should be modified to £100 and the Zones B and C should have a Nil rate. On the basis of the available evidence, such modifications meet the need, as a matter of judgement, to come to an appropriate balance between the need for CIL funds and the delivery of development.

Waterloo and Vauxhall – Residential and Office Rates

Are the rates for office and residential developments in Waterloo and Vauxhall set at a level which will lead to a reduction in development activity because the viability of schemes will be undermined? Should office development in Waterloo and Vauxhall be 'encouraged' by reducing CIL?

37. The answer to the first question must arise from a viability assessment on which a high level of credence can be placed. The second question suggests that a lower level of CIL charging could bring an advantage over 'competitor' (nearby) areas, but it seems to me that, since the CIL rate will be a relatively small percentage of development cost, provided that the development is viable, schemes will continue to be brought forward and carried through to completion. Thus the main issue for this part of the examination is whether the VS adequately demonstrates that the CIL levels put forward for Waterloo and Vauxhall (Zone A) do in fact provide a high level of confidence that development viability would not be compromised.
38. The methodology and assumptions behind the VS have been accepted generally and no specific evidence has been provided to suggest that the appraisal inputs, such as base construction costs, external cost, etc, are inappropriate. However, the construction period for larger sites, at 24 months, and demolition and external works costs are said not to reflect the reality of large complex sites. In addition, one element of Table 4.46.1 of the VS appears erroneous, affecting site type 6 (one of the two site types for Waterloo and Vauxhall) where the residential sales period in months is shown as 4. My enquiry about this elicited the response that the sales period should

be 20 months, not 4. This was a transcribing error, but all other cells contain correct numbers.

39. The redevelopment of the Shell Centre site is referred to in representations as a 'strategic site' which should have been the subject of a site specific assessment. The Council does not consider that this is a strategic site, but I conclude that, although it comes just below the 5% threshold, its size, complexity and the extent to which it contributes to the development needs of the Borough, and in particular its place in Zone A, means that it is a significant site, even if it is not "strategic". The Council points out that it has been the subject of a recent "call-in" inquiry, following the Council's decision that it would grant planning permission, and the Secretary of State's decision is expected shortly. Thus, the Council contends, the Shell Centre scheme will shortly have its planning permission and will not be subject to CIL. In my view the grant of planning permission by the Secretary of State should not be taken for granted until his decision is issued.
40. Nevertheless, whilst the criticisms mentioned carry some weight, the fact is that the VS has been methodical and based on accepted practice, has tested a range of variables, and has allowed for a substantial buffer to bring rates well below the maximum levels that could be justified. Against this there is no real evidence of alternative appraisals which would give a different outcome, and I conclude that I have no basis for recommending a reduction in CIL rates. My conclusion is reinforced by the fact that the rates for residential and office development apply the Nine Elms Vauxhall 'Development Infrastructure Funding Study' tariff which has been in use and which is to an extent a 'tougher' regime in as much as it does not allow developers to offset existing floorspace against proposed floorspace.

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

41. The Council's decision to use a matrix approach to its CIL rates is based on reasonable assumptions about development values and likely costs. With the exceptions that I have identified at paragraphs 17 and 36 above, the evidence suggests that residential and commercial development will remain viable across most of the area if the charge is applied.

Other Matters

42. Representations on the draft Charging Schedule include comments that the consultation process was inadequate. However, from the information provided by the Council I am satisfied that there has been compliance with CIL Regulations 15, 16 and 17.
43. Concern has also been expressed about CIL being levied on police stations and facilities and on railway infrastructure. The Council has confirmed that such development would come under the heading in the Rates schedule "All other uses not identified above".

Correction/addition to Rates page

44. It was suggest at the hearings that, for clarity, it would be helpful for the rate to be identified as “£ per square metre”. The Council agreed. I do not think that this requires a formal recommendation from me: it can be left to the Council to deal with as this comes within the scope of being purely corrective and/or updating in nature, and is in no way substantive. Similarly, there is a typographical error which I had not previously brought to the Council’s attention at the bottom of the ‘Rates’ page where the bullet point deals with ‘Retail warehouses’. The word “scale” before ‘of household’ should, I believe, be “sale”.

Conclusion

45. In setting the CIL charging rate the Council has had regard to detailed evidence on infrastructure planning and the economic viability evidence of the development market in the Borough. The Council has sought to be realistic in terms of achieving a reasonable level of income to address an acknowledged gap in infrastructure funding, while ensuring that a range of development remains viable across the authority’s area. My recommendations address the issues where the evidence justifies modifications to the rates proposed by the Council.

LEGAL REQUIREMENTS	
National Policy/Guidance	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, subject to the modifications which I recommend, including in respect of the statutory processes and public consultation, consistency with the adopted Core Strategy and Infrastructure Delivery Plan and is supported by an adequate financial appraisal.

46. I conclude that subject to the modifications set out in Appendix A the Lambeth London Borough Council Community Infrastructure Levy Charging Schedule 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.

Terrence Kemmann-Lane

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 to allow the Charging Schedule to be approved.

Modification Number	Modification
EM1	Modify the CIL rate for Student Accommodation (across the whole Borough) from £360 to £215 per square metre
EM2	Modify the CIL rates for Hotel development for Zone A from £250 to £100 and for Zones B and C to Nil