



Technical consultation on the Infrastructure Levy

Date: 9 June 2023

The CLA is the membership organisation for owners and managers of land, property and businesses in rural England and Wales. Our 27,000 members own or manage around half the rural land in England and Wales and operate more than 250 different types of businesses. We help safeguard the interests of owners of land, and all those with an economic, social, and environmental interest in rural land.

Most of our members at some point may carry out development, for the purposes of agriculture, for housing, or to provide retail or employment premises related to their existing business. Alternatively, they may wish to sell land on for others to develop for housing or employment space. So, this consultation will have direct relevance for them.

Rural Development

The CLA is concerned that the new Infrastructure Levy will not be able to be applied to different scales of development across the variety of rural locations without impacting negatively on viability and thereby choking off development. There is always excitement about the high value of development land in the South East and around London, but these values are not representative of values achieved in rural areas. The cost of servicing rural sites is greater, and the cost of developing smaller sites rise as they are unable to benefit from economies of scale. It may also take longer to realise the capital value, particularly of employment space, than in urban areas.

In CLA members' experience, many planning authorities are unable to commit the necessary resources to rural planning, either in terms of planning policy or development control. It is difficult to see that their approach to the Infrastructure Levy will be any different.

CIL was an optional model which was taken up by some local authorities where they had the resources, and it could be implemented without harming the viability. The Infrastructure Levy will be compulsory across all local authority areas. Whilst the aspiration is that viability will be maintained that is very much dependant on the resources put in by local authorities and how accurately they can project costs and values.

The Basis of the Infrastructure Levy

The CLA welcomes the move from a levy charged early on the development process to one that is charged at the completion of the development. However, the CLA is concerned that the Infrastructure Levy as proposed is not the right solution. Having a three stage assessment process for the Infrastructure Levy (planning consent, start of development and completion), coupled with the registration of a land charge seems to make the system over complicated.

The CLA is concerned as that arbitrary decisions may be taken by local authorities as to the level of local land values that they deem acceptable and the Internal Rate of Return acceptable for delivering development. There could be a number of different reasons as to why these levels may be chosen, the levels chosen could be to encourage growth, but with no nationally imposed development targets levels could be set artificially high to discourage development .

The complexity of the proposed Infrastructure Levy is of real concern, as is the uncertainty of the end liability. This is likely to have wider consequences, not least on how lenders/ funders will respond to these.

There is too little information within the consultation that show how the Infrastructure Levy will really work. The examples given show a land value of 10x agricultural value and an IRR of 15% based on the academic research of one organisation, and as far as the CLA can see without any consultation with landowners.

It is necessary to temper the government's expectations here:

- The Infrastructure Levy may produce less income than the Liverpool report suggests either because of fluctuating building costs, house prices less development coming forward because of viability concerns.
- If the Infrastructure Levy is set too high it will quickly choke off development, which may take some time to bring back even when rates are reduced.
- Developers may not wish to develop in areas with a higher Infrastructure Levy and therefore there could be competition between local authority areas which may not be helpful
- Developers may cut back on design, and quality to reduce build costs in an attempt to maintain viability, thus spoiling the character of the development.

The Planning system

Much of the levy proposals are based on the needs identified from within the planning system, and that is a weakness.

Almost half of local authorities do not have an up-to-date local plan, with some being over a decade out of date. If local authorities cannot plan their growth, trying to identify the required infrastructure will be no more than a stab in the dark. There is a risk that these authorities will find it very difficult to implement the Infrastructure Levy so they may find themselves falling outside the existing proposals having to rely on s.106 agreements and continuing to fall behind on affordable housing delivery.

There is a real issue with National Parks, where there will be a very low level of development and little levy monies coming in. This is part of the sustainability conundrum with restricting development. Where this is the case, National Parks will have to look for infrastructure funding elsewhere and must not be subsidised by the increased burden of development borne by neighbouring authorities.

The Landowners' perspective

It is important to re-iterate that for most landowners in rural areas, development carries significant risks.

The impact of losing land for development may have an impact on the operation of the rest of the business, which may then require restructuring. Development proposals almost always encounter opposition from some quarters within the local community. At the end, should the development be built, some of the new neighbours may love the countryside but not the level of agricultural activity as much (noise, smells, traffic etc).

For many landowners it can take up to 10 years to get a site adopted into the local plan and for development to start. During all of this time, they will have to pay professional fees to ensure that this land is adequately promoted to the local authority – this often will require any number of surveys to be undertaken to demonstrate the land suitability for development.

Chapter 1 – Fundamental design choices

Question 1: Do you agree that the existing CIL definition of 'development' should be maintained under the Infrastructure Levy, with the following excluded from the definition:

- developments of less than 100 square metres (unless this consists of one or more dwellings and does not meet the self-build criteria)

No. The 100m² threshold is too little and should be doubled to encourage growth. This would also save local authority admin costs assessing and collect small levys.

- Buildings which people do not normally go into

Yes. It is important that agricultural development is specifically excluded from the infrastructure levy; this includes buildings, hard standings, slurry, and manure storage.

Agriculture was not specifically excluded from CIL and there were instances where this proved to be problematic when applied at local authority and mayoral level. Often, agricultural development is marginal in financial terms and therefore any extra charges levied would render the investment unviable. Therefore, the imposition of the Infrastructure Levy on agricultural could prevent development which could help businesses modernise and remain competitive.

In addition, in the main, agricultural development does not place a burden on infrastructure in the same way as other development. It is often required to upgrade existing facilities, protect against pollution, or provide animal accommodation to meet modern welfare standards or good vermin-proof crop storage matched the agricultural production on that holding.

- Buildings into which peoples go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery –

Yes. As above, this should include agricultural buildings and fixed plant and machinery

- Structures which are not buildings, such as pylons and wind turbines.

Yes, this is logical as we need to increase the capacity and connectivity of the electricity network and encourage renewable energy generation. However, the same must be applied other renewable energy systems (e.g., solar).

Question 2: Do you agree that developers should continue to provide certain kinds of infrastructure, including infrastructure that is incorporated into the design of the site, outside of the Infrastructure Levy? [Yes/No/Unsure].

Yes. Both onsite and immediate offsite infrastructure should remain important features of the planning process to ensure there is enough flexibility to find the best solutions for individual developments.

Question 3: What should be the approach for setting the distinction between integral and Levy-funded infrastructure? [see para 1.28 for options a), b), or c) or a combination of these].

C. It would seem best for the principles and the typologies to be set locally so that they are responsive to local needs of the area, and the type of development delivered. However, this needs to be developed under a national umbrella framework to deliver some consistency of approach.

Question 4: Do you agree that local authorities should have the flexibility to use some of their levy funding for non-infrastructure items such as service provision? [Yes/No/Unsure].

No. The Infrastructure Levy is for infrastructure funding and therefore capital investment. If it can be used for service provision, then the capital sums will be quickly eroded for no long-term benefit.

More fundamentally, if the Infrastructure Levy is used for service delivery, it moves from an infrastructure levy to a general tax on land value and development profitability, in which case to refer to it as in infrastructure levy is at best inaccurate and at worst disingenuous.

Question 5: Should local authorities be expected to prioritise infrastructure and affordable housing needs before using the Levy to pay for non-infrastructure items such as local services? [Yes/No/Unsure]. Should expectations be set through regulations or policy?

Yes. The whole purpose of the Infrastructure Levy is to pay for infrastructure and affordable housing and therefore only these should be delivered (see answer to Q.4).

Question 6: Are there other non-infrastructure items not mentioned in this document that this element of the Levy funds could be spent on? [Yes/No/Unsure].

No. The CLA is opposed to levy receipts being diverted away from infrastructure. This would lead to the Infrastructure Levy becoming just another source of non-ring-fenced funding that would support the workings and commitments of a local authority rather than a levy on development to provide much needed infrastructure.

Question 7: Do you have a favoured approach for setting the 'infrastructure in-kind' threshold? [high threshold/medium threshold/low threshold/local authority discretion/none of the above].

Local Authority Discretion. This will enable local authorities to address the scale of development that is being delivered, and to ensure the right balance can be achieved to deliver infrastructure that matches the needs of the local community but also the wider local planning authority area. Setting high threshold might be right for large scale city urban extensions but be unhelpful for market town or village development

Question 8: Is there anything else you feel the government should consider in defining the use of s106 within the three routeways, including the role of delivery agreements to secure matters that cannot be secured via a planning condition?

It is important that for every development that comes forward, S.106, Infrastructure Levy and infrastructure in kind and on-site do not jeopardise the viability of development that would otherwise have been viable. Local authorities need to monitor both the applications that do not proceed through to development and those that do not make it even to application stage. Many applicants will do a considerable amount of work on values and viability of development before submitting an application, so may not bring forward an application if there is little reward.

Chapter 2: Levy rates and minimum thresholds

Question 1: Do you agree that the Levy should capture value uplift associated with permitted development rights that create new dwellings? [Yes/No/Unsure]. Are there some types of permitted development where no Levy should be charged? [Yes/No/Unsure].

Where permitted development leads to a new house being delivered then the Infrastructure Levy should be charged. However, in all cases permitted development rights deliver small scale development and therefore a Levy should not apply. There should be no Infrastructure Levy charge for agricultural development. as this will generate no need for increased infrastructure.

Question 2: Do you have views on the proposal to bring schemes brought forward through permitted development rights within scope of the Levy? Do you have views on an appropriate value threshold for qualifying permitted development? Do you have views on an appropriate Levy rate ‘ceiling’ for such sites, and how that might be decided?

Development using permitted development rights should not be within scope as this would frustrate the ambition to bring forward small scale development as quickly and as simply as possible. Tangling this development up with a three stage Infrastructure Levy process adds complexity and delay – all of which permitted development rights were created to avoid.

Question 3: Is there is a case for additional offsets from the Levy, beyond those identified in the paragraphs above to facilitate marginal brownfield development coming forward? [Yes/No/Unsure].

Yes. The Infrastructure Levy needs to reflect the increased costs and challenges of delivering development of brownfield sites, in terms of site clearance and contamination. These additional costs need to be built into the Infrastructure Levy assessment for each site. This is an example of where a one size fits all methodology would not work.

Question 4: The government wants the Infrastructure Levy to collect more than the existing system, whilst minimising the impact on viability. How strongly do you agree that the following components of Levy design will help achieve these aims?

- Charging the Levy on final sale GDV of a scheme [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]

Agree. However, the GDV on the sale just recognises market value, it does not take into account the land and build costs – it would seem that these will be assessed based on standard figures across a local authority or smaller area depending on the model adopted by a local authority. It seems that there is scope for a potential mismatch between standard costs and cost changes in the real world, against final Gross Development Value which may again impact on viability

- The use of different Levy rates and minimum thresholds on different development uses and typologies [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]

Strongly agree, but they also need to reflect the differences between urban and rural development as the economics of these will be different. There may also be differences across the rural areas too that need to be taken account of.

- Ability for local authorities to set 'stepped' Levy rates [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]

Agree

- Separate Levy rates for thresholds for existing floorspace that is subject to change of use, and floorspace that is demolished and replaced [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]

Disagree. There should be no levy at all charged on replacement floor space, as there is no additional burden on infrastructure.

The levy should only apply to the increased capacity (new m² or an increased number of people being accommodated) not where the area is a like for like replacement as there will be no increased burden on infrastructure.

Question 5: Please provide a free text response to explain your answers above where necessary.

The Infrastructure Levy should only cover development where there is an increased infrastructure requirement. Where redevelopment occurs, the element that relates to replacement accommodation should not be subject to the Infrastructure Levy Chapter 3 – Charging and paying the Levy

Question 6: Do you agree that the process outlined in Table 3 is an effective way of calculating and paying the levy? [Yes/No/Unsure].

No. It is too complex and drawn out with too many variables. We have gone from CIL which is a one stage process to Infrastructure Levy which is a three stage process.

The flaw in the proposed Infrastructure Levy is in trying to marry up desk top modelling to arrive at the Levy on a m² basis and then re-calculate the GDV of the development at a later date in the real world – any errors in the assumptions on land value and IRR will be exacerbated over the life of the development. The Infrastructure Levy needs to be linked with Local Plan delivery and many local authorities do not have adopted and up to date local plans.

Question 7: Is there an alternative payment mechanism that would be more suitable for the Infrastructure Levy? [Yes/No/Unsure].

Yes. The Infrastructure Levy should be focused on real costs and focused on delivering infrastructure rather than capturing land value. The government should assess the total contribution, in terms of other taxes that development makes (Corporation tax, and CGT in particular). The CLA is deeply concerned that the whole premise for the Infrastructure Levy is based upon one study by Liverpool after 13 years of chequered history of CIL.

Question 8: Do you agree with the proposed application of a land charge at commencement of development and removal of a local land charge once the provisional levy payment is made? [Yes/No/Unsure].

No. This is an unnecessary complication and will put additional strain on the Land Charges Register, and could lead to delay in sales if the Charge was not quickly removed once payment has been made

Question 9: Will removal of the local land charge at the point the provisional Levy liability is paid prevent avoidance of Infrastructure Levy payments? [Strongly Agree/Agree/Neutral/Disagree/ Strongly Disagree/Unsure].

Neutral. The extent of any avoidance has not been quantified, so it is unclear whether this is unnecessary admin or there is a real threat of avoidance.

Question 10: To what extent do you agree that a local authority should be able to require that payment of the Levy (or a proportion of the Levy liability) is made prior to site completion? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]. Please explain your answer.

Disagree – it needs to be close to the point of sale as this will be when the developer is close to the sales receipts from the development. If payments are taken earlier, they may have to borrow more, for longer to fund the Infrastructure Levy. This makes the development more risky

Question 11: Are there circumstances when a local authority should be able to require an early payment of the Levy or a proportion of the Levy?

No, early payment of the levy undermines the whole principle set out in this consultation and we could return to a CIL situation where some authorities may always require earlier payment. With the Infrastructure Levy, local authorities will be able to borrow against the expectation of receiving the levy.

Question 12: Do you agree that the proposed role for valuations of GDV is proportionate and necessary in the context of creating a Levy that is responsive to market conditions [Yes/No/Unsure].

Yes, but it should include the real costs of development too, not just look at the final value. It is unclear why this assessment has to be done three times in the process.

Chapter 4 – Delivering infrastructure

Question 1: To what extent do you agree that the borrowing against Infrastructure Levy proceeds will be sufficient to ensure the timely delivery of infrastructure? [Strongly Agree/Agree/Neutral/ Disagree/Strongly Disagree/Unsure].

Agree

Question 2: To what extent do you agree that the government should look to go further, and enable specified upfront payments for items of infrastructure to be a condition for the

granting of planning permission? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure].

Disagree. Where these are necessary, they should be s.106 not Infrastructure Levy.

Question 3: Are there other mechanisms for ensuring infrastructure is delivered in a timely fashion that the government should consider for the new Infrastructure Levy? [Yes/No/Unsure].

There is a need to ensure that local plans are up to date, that they deliver development and that the Infrastructure Development Schemes are developed to demonstrate the infrastructure requirements to support that level of future development.

Question 4: To what extent do you agree that the strategic spending plan included in the Infrastructure Delivery Strategy will provide transparency and certainty on how the Levy will be spent? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree] Please provide a free text response to explain your answer where necessary.

Strongly agree. It is important to show the requirement for infrastructure and how those costs are to be met through charging an Infrastructure Levy at a certain rate. Without this, the Infrastructure Levy becomes a tax on development, and as such will discourage development.

Question 5: In the context of a streamlined document, what information do you consider is required for a local authority to identify infrastructure needs?

They need to quantify the amount of development that is identified within the Local Plan - so there is a need for these to be up to date (which just under a half are not) and then cost and quantify the aspiration for delivery of infrastructure. .

Question 6: Do you agree that views of the local community should be integrated into the drafting of an Infrastructure Delivery Strategy? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary.

Yes, to enable local infrastructure requirements to be built into the delivery strategies. It will however be up to the Local Authority to make a judgement on what is appropriate to include rather than just collating a shopping list of local requests.

Question 7: Do you agree that a spending plan in the Infrastructure Delivery Strategy should include:

- Identification of general integral infrastructure requirements

Yes, but only where it meets the needs of the new developments, rather than accommodating general infrastructure requirements

**- Identification of infrastructure/types of infrastructure that are to be funded by the Levy-
Prioritisation of infrastructure and how the Levy will be spent**

Yes

- Approach to affordable housing including right to require proportion and tenure mix

Yes, some of this will be driven by assessments in the local plan

- Approach to any discretionary elements for the neighbourhood share

Yes

- Proportion for administration

Yes, Administration should be kept to a minimum, otherwise this will erode the amounts available for infrastructure delivery. A sizable proportion should be funded as part of a local authorities' normal administration budgets. It should be borne in mind that the Infrastructure Levy is for the delivery of the public benefits aspects of development and therefore administration costs should part of the Levy.

- The anticipated borrowing that will be required to deliver infrastructure

Yes, together with timelines as to when the investment needs to be made, and when the receipts will be made to the council. There will need to be a budget, which will be publicly accessible, to show the borrowing, the allocated infrastructure and expected dates when the Infrastructure Levy will be received.

Question 8: How can we make sure that infrastructure providers such as county councils can effectively influence the identification of Levy priorities?

They will be part of the process for building up the strategies. It will be up to County Councils to identify their needs. It will not be very much different from Council Tax where it is collected by the second tier authority but most of the expenditure included is from first tier and others

- Guidance to local authorities on which infrastructure providers need to be consulted, how to engage and when

Education, healthcare, water companies, highways, Fibre Broadband. They need to be consulted at the outset, of both the planning system and the Infrastructure Development Schemes to ensure that the financial contributions are based on true costings

- Support to county councils on working collaboratively with the local authority as to what can be funded through the Levy

This should be set out in a national framework, but with the local authority pulling together the Strategy and deciding what infrastructure is in scope. The whole strategy should be tested at inquiry thus allowing anyone to challenge the spending or the priority.

- Use of other evidence documents when preparing the Infrastructure Delivery Strategy, such as Local Transport Plans and Local Education Strategies

Yes

- Guidance to local authorities on prioritisation of funding

This should be provided nationally

- Implementation of statutory timescales for infrastructure providers to respond to local authority requests

This should be provided nationally

Question 9: To what extent do you agree that it is possible to identify infrastructure requirements at the local plan stage? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Strongly agree. The Local Plan should be the key to identify Infrastructure needs as it will identify the quantity and location of development, from which the infrastructure delivery strategies can be built up. That is why having up to date adopted local plans is so important.

Chapter 5 – Delivering affordable housing

Question 1: To what extent do you agree that the ‘right to require’ will reduce the risk that affordable housing contributions are negotiated down on viability grounds? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Neutral, if the Infrastructure Levy proposals are robust. There will still be a debate about the split between onsite and offsite delivery.

Question 2: To what extent do you agree that local authorities should charge a highly discounted/zero-rated Infrastructure Levy rate on high percentage/100% affordable

**housing schemes? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]
Please provide a free text response to explain your answer where necessary.**

Strongly agree that there should be a discounted rate on purely affordable sites, however these affordable dwellings will still have a requirement and should contribute to Infrastructure provision.

Question 3: How much infrastructure is normally delivered alongside registered provider-led schemes in the existing system? Please provide examples.

N/A

Question 4: As per paragraph 5.13, do you think that an upper limit of where the 'right to require' could be set should be introduced by the government? [Yes/No/unsure]

No. Nationally set upper limits may not help as each site/development will be able to deliver a different onsite requirement either because of the character of the site, location, or viability

Alternatively, do you think where the 'right to require' is set should be left to the discretion of the local authority? [Yes/No/unsure]. Please provide a free text response to explain your answer where necessary.

Yes

Chapter 6 – Other areas

Question 1: Are you content that the Neighbourhood Share should be retained under the Infrastructure Levy? [Yes/No/Unsure?]

Yes. The ability to demonstrate local community benefit from development is very important – and something which has been missing of late - which is why engagement is required early on. It is also important for developers to see local spending, rather than money being squirreled away by local authorities for spending away from the development.

Question 2: In calculating the value of the Neighbourhood Share, do you think this should A) reflect the amount secured under CIL in parished areas (noting this will be a smaller proportion of total revenues), B) be higher than this equivalent amount C) be lower than this equivalent amount D) Other (please specify) or E) unsure. Please provide a free text response to explain your answer where necessary

D. The Neighbourhood share should not necessarily depend on the development within the parish area, but more widely with neighbouring parishes. They key should not be which parishes but that the benefit of the levy spend is local.

Question 3: The government is interested in views on arrangements for spending the neighbourhood share in unparished areas. What other bodies do you think could be in receipt of a Neighbourhood Share such areas?

Where an area is unparished there is often a community group or parish meeting out of which a more formal structure could be developed, in partnership with the local authority. There is no reason by areas without a Parish Council should be proportionately any different from those with.

Question 4: Should the administrative portion for the new Levy A) reflect the 5% level which exists under CIL B) be higher than this equivalent amount, C) be lower than this equivalent amount, D) Other, (please specify), or E) unsure. Please provide a free text response to explain your answer where necessary.

A. The amount of the administrative proportion should be kept within the current CIL limit, otherwise too much of the Ley will be spend on administration, this eroding the infrastructure that is so needed

Question 5: Applicants can apply for mandatory or discretionary relief for social housing under CIL. Question 31 seeks views on exempting affordable housing from the Levy. This question seeks views on retaining other countryside exemptions. How strongly do you agree the following should be retained:

- residential annexes and extensions; [Strongly Agree/Agree/Disagree/Strongly Disagree]

Agree. As in the main this will not lead to an increased demand for infrastructure, although if more bedspace is to be provided than Infrastructure Levy should be charged

- self-build housing; [Strongly Agree/Agree/Disagree/Strongly Disagree]

Disagree. There is no reason why self-build housing should not be included within the levy. They are another method of building houses and collectively they will all have an infrastructure requirement and so should contribute as all development to the levy.

If you strongly agree/agree, should there be any further criteria that are applied to these exemptions, for example in relation to the size of the development?

No

Question 6: Do you consider there are other circumstances where relief from the Levy or reduced Levy rates should apply, such as for the provision of sustainable technologies? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.

No

Question 7: To what extent do you agree with our proposed approach to small sites? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Disagree, the levy should not be charged on small rural sites which deliver some affordable housing on site. Often the development of these sites is marginal and therefore development will not be forthcoming if additional costs are added.

Question 8: What risks will this approach pose, if any, to SME housebuilders, or to the delivery of affordable housing in rural areas? Please provide a free text response using case study examples where appropriate.

The CLA welcomes this specific question. Many rural sites are small scale, have a higher design costs so that they blend in, and are often more expensive to service. There are also fewer houses being built in rural areas. Some settlements have had no new affordable dwelling built for the last decade or two. This means that, as we have explained in other answers, the policy details must ensure that the Infrastructure Levy is streamlined in its process and proportionate in its quantum.

Question 9: Are there any other forms of infrastructure that should be exempted from the Levy through regulations?

No

Question 10: Do you agree that these enforcement mechanisms will be sufficient to secure Levy payments? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Neutral. The CLA is concerned that a local land charge is too cumbersome a way to ensure enforcement, and would the charge be lifted in time for the pre-purchase enquiries. The use of Stop Notices is not acceptable – these are supposed to be used to stop harmful, unauthorised development, not as a debt control mechanism. If further enforcement is required, then the risk of non-payment needs to be better qualified and quantified

Chapter 7 – Introducing the Levy

Question 1: Do you agree that the proposed ‘test and learn’ approach to transitioning to the new Infrastructure Levy will help deliver an effective system?

Yes, however far more work needs to be done on developing the concept before it is trialled. There is too much concern across the industry, as a whole, as to how this will be implemented. This consultation should be seen as the start of the process.



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