

Community Infrastructure Levy

Preliminary Draft Charging Schedule for Broadland, Norwich and South Norfolk: Regulation 15 Consultation 3 October 2011 – 14 November 2011

This document provides an audit of all the responses to the 15 questions in the consultation and provides an officer comment to the issues raised. It also provides detail on what action was taken to address the issues raised in each individual response.

The Partnership asked respondents to note which District their comments applied to, however most responses raise issues that apply across the area and so all responses are valid in all areas.

Note: A number of respondents did not complete the response form and were logged under Question 15. These have been reviewed and, where it is considered they raise issues under other questions, they have been copied under those questions. These responses are shaded in grey.

Question 1:	Having considered the evidence do you agree the appropriate balance between the desirability of funding from CIL and impacts on the economic viability have been met?
Total number of response: 38	
Yes: 12 No: 20 Comment: 6	
Summary of Issues Raised:	
<ul style="list-style-type: none"> • Potential negative impact on affordable housing • Various concerns about the impact of proposed rates on the viability of development, particularly residential, and challenges to the GVA evidence reports • Potential impact on brownfield development • Concern about cross border issues with Breckland • Challenge to the 2 residential zones, including the evidence and detrimental impact • A range of concerns about the principle of CIL and/or issues that relate to the regulations • A range of concerns about how CIL receipts are to be spent 	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL001	Wilkinson Builders	<p>Comments made under Q15 that raise issues relating to this question.</p> <p>We write in response to the article on the above published in the Eastern Daily Press, dated Tuesday 4th October 2011.</p> <p>As a small property developer ourselves, we would state that in the current economic climate, it is very difficult for developers to make a profit presently.</p> <p>With the new levy proposed to be charged by councils on new developments in and around Norwich, we believe this would make it even more difficult and not make it worthwhile building. We therefore feel we would be forced to stop building new properties.</p>		<p>If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability.</p> <p>Latest published research published by Savills in December 2011 indicates signs of recovery in the Norwich housing market and forecasts price growth over the next 5 years.</p>	Review proposed residential CIL rates taking account of latest evidence.
CIL002	Mr E.A Newberry	No. The problems with another expense to the developers is that, whilst we need more affordable properties would they provide less profitable buildings if their costs were increased. I think not	Broadland	CIL is not an entirely new additional charge and will largely replace S106 on many developments. It is accepted that there is a balance to be struck to minimise upward pressure on house prices.	No change
CIL005	K J Ewing, Ewing Rentals	<p>Comments made under Q15 that raise issues relating to this question.</p> <p>I read with interest the article in the Eastern Daily Press on Tuesday 4th October.</p>		CIL is not an entirely new additional charge and will largely replace S106 on many developments. If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the	Review proposed residential CIL rates taking account of latest evidence.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>I am not personally involved with the development, but do act for various small local builders.</p> <p>The level of the levy proposed would be catastrophic for these builders. They are already struggling to sell properties in this present difficult climate and if they were having to find this additional infrastructure levy I truthfully think it would put them out of business.</p> <p>The County can ill afford to lose any new builds in the present climate.</p> <p>I would be interested to know how many new units are being completed at this moment in time compared to, say five years ago. I expect it is a downward trend. This levy would make it far worse.</p>		<p>earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability</p> <p>Latest published research published by Savills in December 2011 indicates signs of recovery in the Norwich housing market and forecasts price growth over the next 5 years.</p>	
CIL007	Stratton Strawless Parish Council	No. As our parish does not have a settlement limit and no planned expansion, the levy is nothing more than a tax on people who will not see any direct benefit	Broadland	CIL is a levy on development and will be spent on infrastructure with a range of benefits.	No change
CIL009	Stockton Parish Meeting	No. Tariff for smaller retail premises seems disproportionate to other proposed tariffs. So can't agree that there is appropriate balance overall.	South Norfolk	See response to Q8	No change
CIL012	Gary Hayes, Willow Builders	<p>Comments made under Q15 that raise issues relating to this question.</p> <p>In simple terms I comment as follows:-</p> <p>The levy rates are absolutely ridiculous which if applied to say a site which we are preparing to develop in South Norfolk will make the scheme non-viable.</p> <p>You should be introducing scheme to cultivate and assist the development market because if we don't start to seeing growth in this area soon the uk economy will undoubtedly start the decline into the second dip of recession.</p> <p>The timing of this scheme is probably the worst you could have picked with the property prices on the decline and development of new homes at an all time low are you trying to kill the building industry off completely!</p>		<p>If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability.</p> <p>Latest published research published by Savills in December 2011 indicates signs of recovery in the Norwich housing market and forecasts price growth over the next 5 years.</p>	Review proposed residential CIL rates taking account of latest evidence.
CIL014	Templemere Residents Association	No. Templemere is on the Ring Road, at the boundary of Norwich and Broadland. Given that we are adjacent to 2 major brown field sites which are not showing any signs of imminent development, the Association does not support any distinction between charging in Norwich and Broadland, particularly if that makes it less likely for those sites to be developed.	Broadland Norwich	The majority of residential development in Broadland will be subject to the same charge as in Norwich.	No change
CIL018	Norfolk Geodiversity Partnership (Jenny Gladstone)	<p>I wish to draw your attention to an area of Green Infrastructure not covered in your Topic Paper: Green Infrastructure and Recreational Open Space (GNDP, June 2011)</p> <p>Geodiversity is nowhere mentioned within this Topic Paper although CIL funding could greatly help to develop and value the geological and geomorphological landscape. As far as I am aware the Norfolk Geodiversity Partnership (NGP) has been given no opportunity to comment on the Topic Paper and the result is that again the interests of the none biotic landscape are ignored – biodiversity is referred to on 14 occasions within the Paper whereas geodiversity is not mentioned once. This despite the fact that some of the GNDP SSSIs are designated for their geology.</p> <p>There are many of the Small Strategic Projects which are listed that I consider that it is essential should have a geodiversity input:</p> <p>The NGP is currently searching for funding for a Mousehold Heath Earth Heritage Trail. The chalk bedrock and glacial sands, gravels and clays are the 'bedrock' of the area's heathland. Extraction pits which pit the heath's surface are the source of building materials for much of ancient Norwich.</p> <p>Whitlingham Broad was created by gravel extraction, and the ancient pits in the chalk ridge were created by chalk and lime workings. This is another area for which NGP is searching for funding for an interpretive trail.</p> <p>The CT5 project on churches obviously needs an input on the local building materials that the church fabrics are built out of.</p> <p>The extraction industry plays an important role in creating the area's landscape, disused pits are not only areas to fill with waste; they are also potential windows into the area's hidden landscape.</p>	All	The importance of geo-diversity is clearly recognised in the JCS. Consequently, Green Infrastructure projects would be expected to address geodiversity where deliverable, appropriate and relevant.	No change. Refer comment to Green Infrastructure Steering Group for projects information.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		NGP now has a short Norfolk Geodiversity Action Plan. I am also returning a copy with this form. I would like please a response to this comment made on behalf of NGP, along with any reasoning as to why geodiversity is not included within the Topic Paper: Green Infrastructure and Recreational Open Space.			
CIL019	IE Homes and Property	No. The GVA Final Report Dec 2010 assumes incorrectly that short term development viability challenges will be overcome as market conditions improve in their justification of the CIL tariff levels (Recommendations 7.26). This is clearly a dangerous assumption given the continuing deterioration in global economic conditions especially in Europe. There is absolutely no evidence at all to assume there will be any improvement in market conditions and therefore development viability in the short term.	All	If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability.	Review proposed residential CIL rates taking account of latest evidence.
CIL020	Postwick with Witton Parish Council	Yes. No comment	Broadland All	Noted	No change
CIL027	Horsford Parish Council	Yes. No comment	Broadland All	Noted	No change
CIL029	Orbit Homes	Yes. The introduction of CIL in such an economic climate is a difficult task, however the necessity to do so is apparent. Whether the level of CIL proposed is correct or not will only become apparent once it is introduced and the viability of prospective schemes are considered against the levels. The key important factor in the viability is the continuous review, which at 6month intervals seems a sensible balance in the current climate.	All	Noted. The regulatory process, and the need to provide certainty, makes it impractical to review as regularly as suggested. The authorities intend to review in around 2 years.	No change
CIL031	Norton Subcourse Parish Council	No, we think the level of the CIL should reflect the infrastructure cost to the community. If this isn't reflected in the CIL, over time, the value of land will continue to be distorted. We don't believe the viability of the development should be the basis of the CIL.	South Norfolk	The proposed approach is contrary to the regulations.	No change
CIL032	Salhouse Parish Council	Yes	All	Noted	No change
CIL033	Michael Sida	Yes. In the main, but see answers to questions below.	All	Noted	No change
CIL034	Newton Flotman Parish Council	Yes. Although we have concerns about the effect of a differential tariff on the resulting pattern of residential development. Yes, but time will tell.	South Norfolk	Noted	No change
CIL035	Breckland District Council	No. Breckland Council does not consider that an appropriate balance has been struck between the desirability of funding from CIL and viability. The Council notes a number of inconsistencies within the evidence base that give rise to concerns about how the rates and charging zones have been developed. For example, Wymondham has sales values that are very similar to Attleborough. Recent evidence to support the 2011 Breckland SHLAA review indicates lower sales values and higher development costs which the Council considers would not support the CIL rates as set out in the GNDPs Zone A charging zone (£135 - £160 per sqm). The Wymondham and Attleborough property and land markets operate similarly and examining the evidence in the GVA report, the expected sales values appear overly optimistic. Information to support Breckland Council's SHLAA values has been checked using the 'Hometrack' system which provides accurate information on current market conditions in particular geographical areas. Therefore, it would appear that Wymondham has been included in charging zone A for reasons other than viability which is inconsistent with the Regulations and guidance notes. As such, the high CIL rate being applied to Wymondham could inadvertently have cross boundary impacts on development in Attleborough, but also on the delivery of South Norfolk's Spatial Strategy. It appears that the GVA report appears to be artificially including areas that are identified as 'growth zones' rather than being clear as to what level of CIL development in a particularly location can actually afford. Therefore, the delineation of the charging zones does not appear to have been set solely on viability considerations. The above is further evidenced in Table 3 of the GVA report which shows that Wymondham, Costessey and Easton appear to have markedly lower residential values (around 10% in many cases), yet are still included in zone a. It is all the more surprising that many highly desirable rural areas are then included in the lower value CIL charging zone, particularly as residential sales values in these areas are significantly in excess of the amounts set out for locations such as Wymondham (Hingham and Deopham Wards being	All	The proposed rates are based only on viability evidence. The proposal to set rates at recession levels is not accepted. If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability.	Review proposed residential CIL rates taking account of latest evidence.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>specific examples with consistent sales values per m2 of over £2,000).</p> <p>A further concern is that the GVA report indicates that CIL rates should be based on their 'normal' market scenarios, and uses the argument that as CIL will take time to implement this will effectively allow the market to recover to facilitate such levels of CIL. This approach is not justified, particularly as there is no evidence as to when the UK property market will return to 'normal' market conditions. To suggest otherwise is pure speculation and is contrary to CIL guidance that the charge should not prevent the majority of development coming forward. The approach presented assumes too high a risk that market conditions will recover and there appears to be limited evidence in the GVA Grimley research that sensitivity testing has informed the GNDPs preferred approach.</p> <p>Breckland Council considers that it would be more appropriate for the GNDP to set the rate of CIL based on current recession conditions and then review the rates when there are actual signs of an upturn in the market.</p> <p>The Council considers that resolving the concerns set out in this consultation response now may reduce the risk of third-party challenge at respective authorities' CIL examinations. It should be reminded that the Localism Bill is promoting a duty to co-operate (although not a duty to agree) which has made significant parliamentary progress since the charging schedule consultation was launched.</p>			
CIL036	Hale and Heckingham Parish Council	<p>No, we think the level of the CIL should reflect the infrastructure cost to the community. If this isn't reflected in the CIL, over time, the value of land will continue to be distorted.</p> <p>We don't believe the viability of the development should be the basis of the CIL.</p>	All	The proposed approach is contrary to the regulations.	No change
CIL038	Hugh Ivins	<p>No It appears that developers will be required to fund the infrastructure that results from the 'affordable housing' element of any scheme, despite the fact that CIL is not levied on Affordable Housing.</p>	Broadland	The rates are set with regard to viability of development. The CIL income will be used to fund infrastructure required for the development of the area so this will include the needs relating to affordable dwellings.	No change
CIL040	Ptarmigan Homes	<p>No. The evidence base of the proposed CIL has serious and significant flaws, containing errors and inconsistencies which make the viability assessments prepared by GVA Grimleys (GVA) show an unrealistic number of development scenarios as being financially viable. These errors have been identified by me previously (both verbally and in writing) when I attended the CIL Developer Forum earlier in the year but they seem to have been completely ignored. The Charging Schedule is not based on robust and credible evidence and should therefore be considered unsound. Unless the evidence base is corrected the proposed CIL cannot be justified as being viable.</p> <p>I have the following comments on the document below:</p> <p><u>Viability Advice on a CIL/ Tariff for Broadland, Norwich and South Norfolk (GVA, December 2010)</u></p> <p>- The CIL calculations are based on mid 2007 data which, contrary to what GVA say, do not reflect "normal market conditions". The market at that time was hugely over-inflated and it is unlikely residential sales values in Norfolk will return to the same level for the foreseeable future. Indeed Savills have forecasted (see attached) that current house values in the East of England are at least 9.1% down from 2007 values (bear in mind Cambridgeshire is captured in this figure so Norfolk house prices are likely to be down even further) and are not likely to return to the same levels until 2016. However once inflation is accounted for, no real increase in house values is forecast for the next five years. For GVA therefore to suggest that market conditions will have recovered by the time CIL is implemented is completely unrealistic when you consider CIL is due to be adopted in 2012. Unless CIL is calculated on current market conditions the conclusions GVA come to in this document cannot be relied upon.</p> <p>- The build rates used by GVA come from the BCIS and are supposed to be all-inclusive rates which not only include the cost of the houses but also all the necessary on-site infrastructure. This is not true. Attached is an extract from the BCIS on their suggested build rates which clearly states that they exclude all External works (see first line under "Costs"). As such, an allowance for these costs needs to be made within the viability assessments.</p> <p>- Development land values of £210,000 - £250,000 per acre have been used in the viability assessment for land within the A11 corridor. This is contrary however to the advice that GVA received from local agents whom suggest values are more in the region of £350,000 - £600,000 per acre (with the A11 corridor achieving similar values to the city-centre). The original GVA assessments do not adequately explain why the appraisals have used values for the A11 corridor which are over 50% less than the advice received from local agents, particularly as the document stresses that if land values are reduced by 25% a development becomes unviable. GVA have issued an addendum on the document to try and clarify this inconsistency. However all GVA have done is to suggest previous extracts of text were incorrect and have replaced them with new wording (which does not distinguish the higher development land values of the A11). Bearing in mind the emphasis the document had previously placed on the higher sales values achievable in the A11 corridor (which in turn could justify a higher CIL) it does not seem logical to say that</p>	All	<p>1st point. The proposal to set rates at recession levels is not accepted. If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability.</p> <p>2nd point. The additional work being undertaken by the GNDP is including a separate allowance for on-site costs.</p> <p>3rd point. CIL is expected to put downward pressure on land values. The sites allocation process will need to ensure that viable land is brought forward.</p> <p>4th point. It is accepted that the benchmark site value in the tables for Scheme 5 seems to represent a significant reduction in land values on the benchmark per acre/hectare.</p> <p>The 2nd, 3rd and 4th points will all be passed to GVA. However, it should be noted that they are all being addressed through further viability evidence.</p>	Review proposed residential CIL rates taking account of latest evidence.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		land values would also not be higher. Indeed the suggested change in text could be interpreted as a way to manipulate the facts to fit their original conclusions. It should also be noted that GVA's Addendum contradicts itself by saying on page 2 that the land values used in their report are for land with planning permission while on page 3 they say the land values represent existing use values with an element of "hope value" on anticipation of planning permission. The difference in potential values for each of these descriptions is huge which further brings into question the accuracy of the document. - The viability assessment for Scheme 5 in the A11 corridor uses a benchmark land value of £13m. Assuming GVA's land value of £0.21m - £0.25m per acre is correct this would equate to this scheme having approximately 57 Net Developable Acres. Bearing in mind Scheme 5 is supposed to represent a development of 1,000 houses this would mean the development density of such a scheme would be 17.5 dwellings per acre. This is a high development density and does not reflect the character of most schemes in Norfolk (outside of the city centre) which is less than 15 dwellings per acre (as is supported by Norfolk Homes during the CIL Developer Forum – see their e-mail addressed to Sandra Eastaugh dated 6 th May 2011). If a density of 15 dpa was applied to Scheme 5 it would mean the development would have 67 Net Developable Acres. If applied to GVA's suggested land values this would mean the benchmark land value should actually be £15.4m not £13m as suggested. If this land value had been used in the viability assessments then there would be many more scenarios which would show the CIL charges being unviable or marginal. It is advised that the assessments are re-run to reflect the comments made above, and the CIL rate amended accordingly.			
CIL041	Savills on behalf of Ian Alston, Honingham and Thorpe Farms LLP	No. Whilst it is accepted that there may be a gap in the funding needed as new growth comes forward, it is important that the local planning authorities explain all quotes for funding and the consequence of applying CIL rates which are too high will be catastrophic for the GNDP area. Already within the GNDP there is disquiet and concern about growth being stifled because of land values, obligations and the market in general and the application of CIL on top of a conventional S106 mechanism is anticipated to compound existing problems. From the perspective of encouraging investment and jobs in the area, it seems perverse to further penalise developers at a time when the area needs an economic boost. In such a context it is common sense not to place an extra burden or charge on the retail and business sector which jeopardises the prospect of delivery.	Broadland South Norfolk	CIL will partly replace S106 contributions. The proposed CIL charge on business and retail use is low and not expected to have any significant impact on viability.	No change
CIL045	Morston Assets	No – the draft charging schedule seeks to apply a higher levy to new residential development within the Norwich City area, where new development will be less likely to absorb the cost of a higher CIL rate. The implications of this are that previously developed sites within the Norwich City area, which will have higher development costs than Greenfield sites within Broadland and South Norfolk, will be prejudiced from coming forward for redevelopment. We do not therefore consider that an appropriate balance has been met between the desirability of securing funding from CIL and the impacts on economic viability.	Norwich	No evidence is provided to demonstrate that this will be a significant issue. Values tend to be higher in central areas, counteracting the tendency to higher costs. Brownfield sites can also benefit from existing utilities, access and services	No change
CIL047	Beyond Green	Yes. We would add the caveat "insofar as the Regulations allow". Because CIL is a 'specific' (i.e. £ rather than %) levy on space built (rather than land value) and viability is determined on the basis of an average development, there are potentially disadvantageous effects on residential developments in areas of relative low land value (i.e. outside the city centre) that adopt a compact approach to land use, with a greater ratio of built space to private outdoor space. These potentially face a higher effective tax rate on land compared with more wasteful land uses where value is predicated on the provision of meanly proportioned homes, large gardens and low plot densities (what we understand by "average" development). The effect is not to make development per se unviable but to create a distortion against more compact forms of development in lower-land value locations. Developers that wish to pursue such an approach will, in effect, be required to subsidise the CIL costs of doing so from developers' profit, discouraging innovation. We would add a second caveat that there needs to be a backstop on the level to which the provision of affordable housing, which effectively becomes the balancing item in viability assessments under the draft proposals, can be allowed to fall in any development, otherwise the affordable housing crisis in the area will simply worsen. There is already a risk that the 20% figure used in the GVA viability assessment will become a shadow policy around which developers keen to minimise AGH provision will organise their demonstrations of viability; it is important that this is clearly seen as no worse than a minimum below which, viable or not, developments will not be allowed to sink.	All	While the concerns are noted, higher density development will also tend to maximise value from a given area of land. It is not possible to set a minimum level of affordable housing as there is a need to deal with exceptions. However, the CIL will be set at a rate where, under reasonable market conditions, the majority of sites can provide 33% affordable housing as required by policy.	Take account of these issues when reviewing evidence.
CIL050	Dickleburgh and Rushall Parish Council	I am not able to comment due to lack of technical knowledge. The above documents are also very badly written making them difficult to read, full of jargon and technical language. They are very inaccessible for the non-technical reader.	South Norfolk	Noted	No change
CIL052	Cecil Ball, Town Planning	Comments made under Q15 that raise issues relating to this question. GVA Grimley's Tariff Viability Study states the following:-	All	If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge	Review proposed residential CIL rates taking account of

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Intelligence on behalf of Zurich	<p><i>"In light of the viability difficulties facing all new development at the present time, including the stringent performance and risk reduction requirements from funders, landowners are likely to be reluctant to sell for a price that reflects a significant discount to that which would otherwise apply. If the pressures on developments costs remain as a result of policy initiatives such as improved energy efficiency and carbon reduction and there is no premium sale value to be achieved that offsets the costs, then eventually landowners should come to accept that development values have permanently and significantly been reduced. In this instance they are unlikely to benefit simply by withholding land from the development market. Such a change in attitude or acceptance of a new level of land value is likely to take some years to occur."</i></p> <p>Such a change in attitude or acceptance of a new level of land value is likely to take some years to occur. Therein lies the rub.</p> <p>GVA Grimley's recommendation is to adopt a CIL Tariff based on normal conditions given the time gap between their report of 2010 and likely implementation of the tariff, which they describe as "several years". However, the Greater Norwich Development Partnership's timetable envisages adoption of the CIL Charging Schedules by Summer 2012. We do not expect market conditions to be "normal" by then. There is still widespread uncertainty about the direction of both the national and global economies. "Normal" conditions may take a considerable time to establish and they may well be quite different from what has been regarded as "normal" in the past.</p> <p>None of the consultation or supporting documents make clear whether developers will be contributing more or less to strategic infrastructure under the proposed CIL tariffs than under the current section 106 regime. Informal enquiries with South Norfolk District Council suggest that the proposed tariffs will significantly increase total contributions.</p> <p>GRA Grimley's report notes that:- <i>"For both residential and commercial development the market remains fragile and subject to volatility as a result of the economic recession affecting demand."</i></p> <p>According to the Land Registry's House Price Index, national house prices fell during the period September 2010 to September 2011 by 2.6%. The only region to experience a rise was London. Prices in Norfolk fell by 3.1%.</p> <p>This is not a good time to be introducing a new tax. One of GVA Grimley's main recommendations is raising CIL's profile to improve confidence in the system. We view this as absolutely essential.</p> <p>We have suggested in answers to earlier questions that initial tariffs should be set quite low to finance an infrastructure programme firmly focussed on the top of the priorities list. A lower than expected rate will help boost confidence and help start a virtuous upward circle in activity and returns. Once that is in place, it will become easier to raise rates and bring projects further down the list into the programme.</p> <p>The property market is complex and perhaps undergoing fundamental shifts in the way it works and in demand for its products. Bearing this in mind, it seems essential to us that the administration, setting, monitoring and review of CIL Tariffs is carried out by people with expert knowledge and understanding of the market. GVA Grimley's report looks at a number of options for CIL tariff governance. We strongly support the report's suggestion of establishing an external delivery vehicle model, with subsidiary Special Purpose Vehicles for each of the infrastructure projects undertaken.</p>		<p>will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability.</p> <p>CIL is not an entirely new additional charge and will largely replace S106 on many developments. It is accepted that there is a balance to be struck to minimise upward pressure on house prices. Under the proposed rate of CIL some will pay less than under the existing system of obligations and others will pay more.</p> <p>Latest published research published by Savills in December 2011 indicates signs of recovery in the Norwich housing market and forecasts price growth over the next 5 years.</p> <p>We are continuing to develop our approach to governance and delivery.</p>	latest evidence.
CIL053	Diss Town Council	I am not able to comment due to lack of technical knowledge. The above documents are also very badly written making them difficult to read, full of jargon and technical language. They are very inaccessible for the non-technical reader.	South Norfolk	Noted	No change
CIL054	Aylsham Town Council	No. Evidence based on Joint Core Strategy infrastructure requirements calculated up to 2026. There could be significant changes to requirements in the meantime. When will this document next be reviewed? Given that this is such a new area there should be an opportunity to review after say 2 years when lessons have been learnt and experience gained.	Broadland	The infrastructure plan (the LIPP) is updated every six months. It is intended to review the CIL in around two years.	No change
CIL055	Stephen Heard on behalf of Stop	No	All	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Norwich Urbanisation				
CIL057	Norfolk Rural Community Council	No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted	No change
CIL058	Richard Williams on behalf of Stop Norwich Urbanisation	<p>No We do not agree that the balance has been met. Creating this 'innovative' new tax in order to fund infrastructure has a number of major flaws. Importantly, the amount and disbursement of the proceeds is not subject to adequate safeguards and is at odds with the objectives of Localism.</p> <p>The Joint Core Strategy, on which you rely and, which originally stated in unequivocal terms that the infrastructure requirements could not be funded, was changed post-EiP. The role of the Government Quango, the Homes and Communities Agency shows that this is still reflective of the continuing top-down pressure exerted centrally by unelected bodies.</p> <p>The DJD report which is quoted as viability evidence did not actually produce that conclusion. SNUB identified this in their final submission to the Planning Enquiry. Yet despite further deterioration of the housing situation, this is ignored. (see Para 7.10)</p> <p>There are items on the infrastructure list which are not the responsibility of Councils and these considerably exceed the amount stated by these documents.</p> <p>These proposals depend on a number of unsubstantiated assumptions and create an incremental charge on those items which the Government has traditionally funded but now chooses to devolve to a local level. It has not however created a system whereby this can be safely achieved. By admission it is impossible to forecast the availability of Government funds. This raises credibility issues for the whole process. Unlike S106 agreements this process extends the scope of developer contributions but at the same time removes the link to the project itself.</p>	All	<p>Many of these points relate to CIL as a principle rather than to the proposed local charging schedules.</p> <p>The evidence is considered to fulfil the requirements of the regulations and guidance. Further work is being undertaken to make sure that it is robust, particularly in the context of continuing economic uncertainty.</p> <p>CIL can be used for a wide range of infrastructure needed for the development of the area and is not limited to infrastructure that is the direct responsibility of local councils.</p>	No change
CIL062	Savills on behalf on Easton Landowners Consortium in conjunction with Norfolk Homes and Endurance Estates	<p>No. We do not agree that the balance between the desirability of funding from CIL and impacts on economic viability have been met for the following reasons:</p> <p>GVA Final Report and Charging Zones Schedule</p> <p>1. We consider the approach taken to assess viability by your advisors, GVA, to be flawed. Having spoken a number of the agents, developers and house builders mentioned in their report as having given views on values etc, many deny having spoken to them. Of those that did, we have not been able to pin point one that provided value and build cost inputs similar to those adopted by GVA in their appraisals. Whilst they might have had regard to Land Registry data, this cannot give the same level of information and background as speaking to those acting and developing in the GNDP area. Savills new homes department were agents on 7 schemes, amounting to 97 units in 2007 and 5 schemes, 51 units, in 2009 within the GNDP area. Despite this we were not asked to provide hard data in relation to sale prices, property and scheme sizes, timing of sales and incentives. Various staff did however attend meetings and open forums where the inputs adopted by GVA were challenged. At no time did Savills concur with the inputs.</p> <p>2. In order to assess viability, GVA had regard to minimum land values of £500,000 per acre in the central area, £210,000 to £250,000 per acre in the Inner Area and A11 Corridor and £200,000 per acre in the Outer Area. Their assumption of viability was benchmarked against these and they concluded that that provided the effects of introducing CIL/Tariff did not result in a reduction in land values of more than 25%, then landowners will not ultimately withhold their land from the market. We accept that these are reasonable for recessionary land prices but are well below those achieved at the height of the market. GVA have assessed viability based on height of the market house prices benchmarked against recessionary land values, so it is hardly surprising that they achieved positive results. They should have taken a consistent approach and benchmarked values at the same point in the property cycle. Landowners know that, at the height of the market, land values in the Inner Area were more than twice the value being adopted (see table attached at Appendix 1) so they are unlikely to release land at £375,000 per acre more as house prices start to rise. This unbalanced assumption by GVA could severely restrict the land coming forward for development in the medium to longer term.</p> <p>3. GVA has carried out some viability assessments having regard to the availability of grants to housing associations. Whilst these might have been available at the height of the market, they are not going forward and GVA should have carried out their assessments only on a realistic basis rather than a hypothetical one. All of the assessments on this basis are therefore irrelevant.</p> <p>4. GVA recommends that CIL/Tariff be set on "normal" market conditions. Their view of normal is the peak of the market as at 2007. We attach various property indicators at Appendix 2, which clearly show 2007 to be a significant peak. If the CIL/Tariff is to be indexed going forward based on BCIS build costs, then it has to be set at a level which reflects house prices at the date that the indexation starts, i.e. current market levels. We attach the BCIS Tender and Cost Forecast Graph, which shows that 2010 was the trough in build costs and it has been rising since. If CIL/Tariff is based on 2007 house and commercial values, then</p>	All	<p>Point 1. Noted</p> <p>Point 2. Noted. CIL is expected to put downward pressure on land values. It can be expected that this will have most impact where land prices have been particularly inflated in the past.</p> <p>Point 3. GVA's advice is based on the "without grant" assessments.</p> <p>Points 4 – 7. The proposal to set rates at recession levels is not accepted. If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability and will take account of the model and data supplied by this consultee including current costs and values.</p> <p>7e. The GVA advice is the total level of developer contributions (i.e. CIL plus any residual S106)</p> <p>7f. Brownfield land will tend to benefit from existing utilities and access. The floor area of existing buildings in use is discounted from the chargeable floorspace. Brownfield sites are often in higher value areas.</p> <p>Comments on Background and Context document: The assumptions on remaining obligations through S106 (or S278) were derived from expectations on site access and on site green infrastructure. It is an unavoidable consequence of taking account of these costs that smaller sites will be advantaged. It is accepted that greater clarification and refinement of these residual costs is required for the ongoing</p>	<p>Take account of these issues when reviewing evidence</p> <p>Pass points relating to their report to GVA for comment.</p> <p>Review the Background and Context document to make sure the explanations are clearer.</p>

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>they will be artificially high to start and this error will not be rectified due to the increasing index.</p> <p>5. It appears from the GVA report of December 2010 that their recommendations are partly based around the assumption of a quick recovery to the housing and commercial markets. We understand that they were only able to have regard to the data available to them prior to their report being published but GNDP now have the benefit of hindsight. House prices are now falling again and there has been no let up in the high availability of commercial premises. We attach a copy of the latest Savills' research into the housing market at Appendix 4, which now states that the five year forecast has changed radically with inflation adjusted growth at -11.00%. This is a very different background to that in existence when GVA were reporting.</p> <p>6. As GVA have based their recommendations on a "normal" 2007 basis, they have used the maximum sales rates. They have adopted an average rate of £2,250 per sqm for Zone A, which, in the absence of clear evidence, we have assumed relates to both houses and flats. We have analysed average sales rates across four schemes in Norwich and set out the percentage uplift in flats over housing below.</p> <p>Samson & Hercules, Tombland (City Living)</p> <p>2007 – n/a 2009 – 50%</p> <p>Old Millers Wharf (Hopkins Homes)</p> <p>2007 – 17% 2009 – 17%</p> <p>Meridian Place (Hopkins Homes)</p> <p>2007 – 14% 2009 – n/a</p> <p>Fellows Plain (Charles Church)</p> <p>2007 – 25% 2009 – n/a</p> <p>Furthermore, in 2007, developers in Norwich followed a uk wide trend of delivering city centre flats and large schemes such as Reads Mill and Paper Mill Yard came to the market and achieved record rates. This type of development does not only skew the average value but also build and sales rates. It is imperative that the charging authorities understand that this phenomenon will not be repeated as there are a) very few sites with scope for such schemes, b) a lack of funding for flats for both owner occupiers and investors and c) a lack of demand. Not only, therefore, should 2007 not be considered to be the normal market but going forward average prices should only be reviewed across houses not flats.</p> <p>7. Having regard to the inputs included by GVA in their appraisals as set out in the residual calculation attached at Appendix 2, it is clear that they have omitted many costs from their appraisal, including:</p> <p>a. The increase in costs due to the need to achieve the rising code levels for sustainable homes. At Appendix A2 of their December 2010 Report, they state that they have assumed Level 3 for private homes and Level 4 for affordable housing in their "recessionary" appraisal and Level 6 for both in their "normal" appraisal. Their build cost range is £861 to £1,076 per sq m for both scenarios. On their average unit size of 90 sq m, this equates to a build cost of between £77,490 and £96,840. Even with the lack of discernable data, it is reasonable to assume that they have adopted the lower figure for Level 3 and the higher figure for Level 6. In Appendix A2 they have compared their approach with that taken by Drivers Jonas Deloitte (DJD) who carried out an affordable housing study for GNDP. It is interesting to note that DJD's base cost is between £1,040 and £1,190 per sq m with an additional £7,000 per unit for Level 4 and £27,000 for Level 5. On a 90 sq m unit on this basis, the build cost would be a minimum of £100,600 for Level 3 and a maximum of £134,100 for Level 5. This is a differential of between 29% and 38%. We attach at Appendix 3, extracts from the CLG Cost Analysis of The Code for Sustainable Homes report, which sets out a view on the impact of the Code on build costs both now and going forward. It is clear that the cost assumptions made by GVA are incorrect and therefore make their viability appraisals unsafe.</p> <p>b. We consider the build cost adopted by GVA to be low, irrespective of their assumptions in relation to the Code. You are aware of the detailed build costs provided by Norfolk Homes and these are supported by data that we have received from various house builders in relation to the loan security valuation work that we undertake. The rates normally adopted are exclusive of many of the site/estate costs and these, too, have been explicitly set out in the Norfolk Homes appraisal, equating to about £100,000 per acre. We have also had advice from Duncan Jenkins of 4dplan, who acts on behalf of Endurance Estates in relation to the larger sites, which require adopted spine roads and other major infrastructure and this cost can rise to between £200,000 and £250,000 per acre.</p> <p>c. GVA appears to have assumed that the provision of affordable housing is cost neutral. Even with grants, this was an unreasonable assumption but going forward in a world of no grants, it is unacceptable. We have spoken to a number of house builders, both local and regional/national who state that, at best, they receive 75% of the open market value for intermediate units down to 40% for affordable/social rent whereas, due to Code Level 3, they cost more to build. A cost neutral assumption does therefore skew the</p>		<p>viability evidence.</p> <p>It is accepted that the most recent evidence on the housing market predicts a slower/longer recovery. This will need to be reflected in CIL rates and phasing policy.</p>	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>residual substantially. The GDVs for the affordable provision on the Norfolk Homes appraisal are indicative of the offers they are receiving from housing associations but we have also been given evidence of offers from another local housing association at between £66 per sq ft and £93 per sq ft for two bed units, both of which lie below the total build cost rate. A cost neutral approach is therefore unacceptable when considering the level of CIL/Tariff.</p> <p>d. GVA have omitted to include standard development appraisal costs such as stamp duty land tax and land purchase legal fees. Their work also appears to exclude the cost of EPCs, NHBC warranties etc, all of which should be included in a full viability appraisal.</p> <p>e. We were advised during a recent meeting with you that the average Section 106 cost that would remain on developments would be circa £750 per unit, including affordable housing. GVA have not included this in their appraisals.</p> <p>f. There is no clarity in relation to the issue of additional costs associated with brown field sites, in relation to demolition, remediation etc. If this is included in the low build costs as set out above, then any assumption that brownfield land can come forward for development at the proposed CIL/Tariffs is unsafe. The Government set a target of 60% of development being on brownfield land and this aspiration has been fulfilled as far as possible in the site specific policies and five year housing supply for the three charging areas. We consider that the GVA recommendations severely compromise these policy documents.</p> <p>g. GVA has not included the cost of achieving a workable planning permission. Drivers Jonas Deloitte did in their affordable housing assessment and it is a cost factored in by both developers and agents alike when carrying out residual valuations. The cost of applying for planning permission is considerable and cannot be disregarded.</p> <p>Community Infrastructure Levy: Background and Context</p> <p>1. GVA recommended CIL/Tariff of £170 per sq m for Zone A and £85 per sq m for Zone B in relation to residential development. The Background and Context document states that these levels are considered viable on the basis that they are in line with agreed Section 106 contributions from various "open book" appraisals carried out in relation to current planning applications. However it is recognised that Section 106 contributions will still be payable and these have been estimated at £750 per property. There is no reasoning provided as to why this is a suitable level and we consider that it will vary significantly from site to site, depending on the proposed scheme. In order to adjust the CIL/Tariff accordingly, £10 per sq m has been deducted from the GVA recommended level to arrive at charges of £160 and £75 per sq m. It is difficult to comment on this without any background workings but we consider it to be a very simplistic approach and whilst smaller schemes may not make any Section 106 contributions at all, larger schemes will make considerably more and it is these large schemes that will enable the charging authorities to a) fulfil their housing requirements and b) be the main contributors to the funding gap via CIL.</p> <p>2. Section 7.11 gives a very optimistic view of the recovery in the housing market in the eastern region. Whilst there was growth in house prices earlier this year, the trend has changed once more and we have seen further falls in pricing over the past two months or so. The Royal Institution of Chartered Surveyors September report indicated that property price expectations for the future remain negative, with 23 per cent more members expecting a decline in prices over the next three months. House prices will fall 10.5 per cent in real terms over the next five years, as inflation outstrips their rise, according to a NIESR forecast. This has prices to ease 4.5% in real terms in 2011 and then 'by an average of 1.5% per annum in the subsequent four years.' This pattern could see house prices post small nominal rises, but the economic forecasters see these as falling behind RPI inflation. This is in line with the Savills research, mentioned earlier in this section. GNDP's view of a 21% average house price rise to 2015 is clearly way off the mark.</p> <p>3. We note that, despite their view of house price growth, each authority within GNDP has adjusted the CIL/Tariff down by 20%. There is no explanation given for this change but in view of the above, it appears that they are trying to minimise the potential damage to the development industry in the GNDP area from a significantly flawed initial study. A total review of the data is required and more regard had to what those who are going to develop in the area going forward have to say. We do not consider that there is a general antipathy towards CIL as many builders are currently frustrated by potential development land being restrained by the need for more infrastructure and see CIL as the fairest way of delivering what is needed. They are however, rightly, concerned that at the current proposed levels, CIL/Tariff will stop land coming forward, reduce the provision of affordable housing and generally make a lot of development unviable.</p>			
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction	<p>Comments made under Q15 that raise issues relating to this question.</p> <p>We agree with the principle of CIL as a transparent method of filling the infrastructure funding gap but it has to be set at a level which will enable development going forward to fulfil the GNDP housing requirements and provide affordable housing at the required 33% where possible.</p>	All	The majority of brownfield sites that come forward in the immediate future are likely to have permission or gain permission before CIL is introduced. CIL is only payable on the net increase in floor area so redevelopment sites may not have to pay as much	Review proposed residential CIL rates taking account of latest evidence.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	<p>We have studied the five year land supply and plotted the proposed development sites on the CIL Charging Zone Map. From this exercise, we have found that all the development land over the next five years is within Zone A. Of this only two sit outside the former Inner Area as allocated by GVA. Whilst we have not assessed each one individually, from our knowledge of Norwich, we can see that the vast majority are brownfield sites, thus requiring some form of demolition and/or remediation. This puts a maximum of 63.97 hectares (3,636 units) at risk from the viability miscalculation. Assuming 33% affordable housing, this amounts, potentially, to the loss of 1,200 affordable units over the next five years.</p> <p>The viability approach by GVA is so flawed that, even where there is potential for sites to come forward at the proposed level of CIL/Tariff, it is very unlikely that there will be any "surplus" in the development to provide anywhere near the required level of affordable homes. If CIL/Tariff is set but Section 106 obligations are still subject to viability arguments, then affordable housing is the most obvious casualty.</p> <p>CIL will be used to fund infrastructure required to enable development across the GNDP area. Due to the phasing of development, this infrastructure has to be forward funded by the charging authorities. If the proposed charging schedule is adopted, there is a clear and significant risk that much of the envisaged development will simply not come forward. The charging authorities are therefore at great risk of incurring huge debt with no guaranteed way of servicing it.</p> <p>It needs to be understood that even if house prices do rise to 2007 peaks or beyond, the development world is a very different place now. The Code for Sustainable Homes, general rising build costs, reduction in labour pools, the reluctance of land owners to sell, the significantly low level of transactions, the lack of finance and the cost of finance are all factors which both commercial and residential developers have to contend with. The CIL/Tariff is a reasonable way in which to fund infrastructure but it would be inequitable for it to be set at a level which reflects an economy and development world of four years ago and then be set to rise on an index linked basis.</p> <p>We understand that this exercise is about viability in this area and, therefore, comparisons with other charging authorities are difficult. However from those CIL/Tariffs that have been set, the GNDP area appears high other than when compared with LB Wandsworth, even those which are closer to London and therefore benefit from much higher land and property values.</p>		<p>as an equivalent greenfield site.</p> <p>CIL is not an entirely new additional charge and will largely replace S106 on many developments. It is accepted that there is a balance to be struck to minimise upward pressure on house prices. Under the proposed rate of CIL some will pay less than under the existing system of obligations and others will pay more.</p> <p>Latest published research published by Savills in December 2011 indicates signs of recovery in the Norwich housing market and forecasts price growth over the next 5 years.</p> <p>This consultee provided detailed viability evidence which is being considered alongside the GVA evidence to arrive at appropriate rates of CIL.</p>	
CIL063	Leeder Family	<p>No comment at this time on the generality of the CIL mechanism.</p> <p>However, the specific proposals for Long Stratton as a major growth area in the Adopted Core Strategy are considered appropriate given the unique status of the village on a strategic corridor which will see an increase in traffic related to growth in the region that directly impacts on the environment within the village. The former A140 Trunk Road has been accepted as strategic infrastructure and has long been considered a primary focus for improvement by the Local Authorities to improve the environment within the village. It is a project that failed to secure funding as a result of the previous Government emphasis on Regional Growth Areas and funding. The A140 provides key linkage in relation to the southern extent of the Norwich Policy Area (NPA) and within the GNDP area as a whole.</p> <p>The allocation of growth in the village to directly fund part of this infrastructure was accepted as being appropriate in the adopted Core Strategy.</p> <p>The emphasis on funding also being provided through CIL is fair and reasonable given the strategic nature of the A140 and its importance in providing the connections necessary to sustain economic growth in the region and NPA. Only three major transport corridors provide such a connection, the A11 Trunk Road, A47 Trunk Road and A140. The applicability of CIL to fund this infrastructure is therefore not questioned.</p> <p>The Inspectors to the Core Strategy noted that the provision of a wholly developer funded bypass would place a burden of £11k per dwelling over the 1,800 new dwellings proposed at Long Stratton. We consider it was not the Inspectors intention that the bypass funding would have been wholly provided by development in Long Stratton.</p>		Noted	No change
CIL066	A.B. Walker	Yes	All	Noted	No change
CIL067	Redenhall with Harleston Parish Council	We do not have the expertise or knowledge within the area to make a useful and valid comment	South Norfolk	Noted	No change
CIL068	Bunwell Parish	No We do not believe that the evidence base is sufficient (missing out for example http://www.neighbourhood.statistics.gov.uk/dissemination) and in particular we do not believe the Zone B	Broadland South Norfolk	House price information is the basis for the proposed two zones. The neighbourhood statistics	Take account of the variable viability in

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Council	charging takes these factors into account - the desirability of living in a rural area as reflected in house prices - the fact that most rural developments are small and largely escape the rigours of the Section 106 obligations -the fact that most rural developments are on land which does not pass through developers' hands and so does not have the same level of costs –including borrowing costs – as large urban developments This is further developed in the answers which follow.		site has been interrogated as suggested and it confirms the GVA report and the house price basis for the two zones. It is recognised that very small sites could have the advantages outlined, however, these will also apply to small scale sites in Zone A. Very small sites will be “windfall” development as it can be expected that the vast majority of allocated sites in both Zones will be for 10 or more dwellings and therefore required to provide affordable housing and subject to other site related costs. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	the outer zone when reviewing the CIL rates.
CIL069	Broadland Community Partnership	Yes We feel it would have been useful to have included the current iteration of the LIPP as part of the consultation material.Frequent mention is made of the LIPP as a critical document, and reference made to the three priorities – but for the non-expert reader, I don't think there is reference to where they can find and read the document. Our only comment comes in relation to section 3 of the CIL background document, where you list sources of evidence.The EDAW / AECOM work is obviously included as the overarching evidence source.We felt that this section would benefit by a sentence or two on how the communities have been involved in putting together the recommendations for local infrastructure needs.You might have used Parish Plans, for example.But the sources for very local needs are not mentioned at all.I think a sense of how communities were involved in either the initial drafting or will be involved in “refreshing” of the data relevant to local needs should be included. Communities will quite clearly be invited to determine specific spend in the future – the question at this point relates to how the overall 5% of total infrastructure for local offsetting (if our guesstimate of what the 5% represents, is correct) has been arrived at.	Broadland	Noted	No change
CIL070	Cringleford Parish Council	Yes	All	Noted	No change
CIL071	Long Stratton Parish Council	No	All	Noted	No change
CIL074	Taverham Parish Council	Yes	Broadland	Noted	No change
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	No	All	Noted	No change

Question 2:	It is intended that, for non-residential development, one charging area will apply to the administrative areas of Broadland District Council, Norwich City Council and South Norfolk Council. Do you agree with this approach?
Total number of response: 35	
Yes: 26 No: 6 Comment: 3	
Summary of Issues Raised:	
<ul style="list-style-type: none"> • Most respondents support the single zone approach • Some support for introducing a zonal approach 	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr EA Newberry	No As land prices vary area to area difficult to see developers agreeing	Broadland	Noted	No change
CIL006	Thurton Parish Council	Yes		Noted	No change
CIL007	Stratton Strawless Parish Council	Yes	Broadland	Noted	No change
CIL014	V Shepherd, Managing Agent, Templemere Residents Association	Yes	Norwich	Noted	No change
CIL020	Postwick with Witton Parish Council	Yes	Broadland	Noted	No change
CIL026	Marlingford and Colton Parish Council	No comment	South Norfolk	Noted	No change
CIL027	Horsford Parish Council	Yes	Broadland	Noted	No change
CIL029	Orbit Homes	Yes As demonstrated in the evidence, there is little viability for non-residential at the present time and therefore little scope to provide for zones within the GNHP area. However, as above the need to review this needs to be considered. The consideration of creating zones for non-residential needs to be based on both economic viability and consideration of where non-residential development would be best placed against the attraction of new-build to generate CIL. e.g. supporting use of existing empty retail space in Norwich City centre rather than promoting new out-of-town retail areas to "cash-in" on CIL.	All	The regulations require that CIL charges can only be varied to take account of development viability and should not be used to influence location. The evidence suggests that viability of non-residential development is generally low but also can be highly variable – with differences too fine grained to enable a zonal approach. It is expected that development with a high degree of viability could contribute to infrastructure needs through additional S106 contributions,	No change
CIL031	Norton Subcourse Parish Council	Yes	South Norfolk	Noted	No change
CIL032	Salhouse Parish Council	Yes	All	Noted	No change
CIL033	Michael Sida	Yes	All	Noted	No change
CIL034	Newton Flotman Parish Council	Yes	All	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL035	Capita on behalf of Breckland District Council	Yes Breckland Council supports the approach of identifying one charging area for non-residential development.	All	Noted	No change
CIL036	Hale and Heckingham Parish Council	Yes	All	Noted	No change
CIL038	Hugh Ivins, Planning Consultant	The commercial and residential charging zones should be identical		The evidence suggests that there is a clearer pattern of values supporting a zonal approach for residential than for non-residential uses.	No change
CIL040	Ptarmigan Land	Yes	All	Noted	No change
CIL041	Savills (L & P) Ltd on behalf of Ian Alston, Honingham Thorpe Farms LLP	Yes The multiplicity of boundaries would have caused more problems and thus a simple solution is the best way forward. Whilst never ideal, it would be best described as the "least worst option".	All	Noted	No change
CIL047	Beyond Green Ltd	Yes	All	Noted	No change
CIL050	Dickleburgh and Rushall Parish Council	No Non-residential development can have a significant impact on local communities. We would be concerned that local communities would not be able to mitigate any effects of non-residential development if the finance raised by CIL is inaccessible to the local area.	South Norfolk	CIL must be based on the viability of development. Subject to viability of a particular development, it would be possible to seek S106 for site mitigation in addition to the CIL charge.	No change
CIL052	Cecil Elliston Ball, Town Planning Intelligence, on behalf of Zurich Assurance Limited	Yes We have no specific comments to make on this particular proposal.	All	Noted	No change
CIL053	Diss Town Council	Yes	South Norfolk	Noted	No change
CIL054	Aylsham Town Council	Yes	Broadland	Noted	No change
CIL055	Stephen Heard, Stop Norwich Urbanisation	No If you wanted Unitary status then you should have done it openly and transparently and not through the secretive activities of the GNDP.	All	Noted	No change
CIL057	Norfolk Rural Community Council	No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted	No change
CIL058	Alan Richard Williams on behalf of Stop Norwich Urbanisation	No This question seems at odds with the narrative in the supporting papers. Viability is reported highly variable and dependent on location and demand. The charge is already low but why also for areas of good location and high demand. Variations in this level could be used to influence development. If car use is an issue then out of town shopping malls which promote car use could be discouraged.	Norwich All	The regulations require that CIL charges can only be varied to take account of development viability and should not be used to influence location. The evidence suggests that viability of non-residential development is generally low but also can be highly variable – with differences too fine grained to enable a zonal approach. It is expected that development with a high degree of viability could contribute to infrastructure needs through additional S106 contributions,	No change
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P),	Yes	All	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium				
CIL066	Mr A B Walker	Yes	All	Noted	No Change
CIL067	Redenhall with Harleston Town Council	Yes	South Norfolk	Noted	No Change
CIL068	Bunwell Parish Council	Yes	All	Noted	No Change
CIL069	Kate de Vries, on behalf of the Broadland Community Partnership	Yes No Comment – the BCP is not a body with the expert knowledge to question this recommendation.	Broadland	Noted	No Change
CIL070	Cringleford Parish Council	Yes	All	Noted	No Change
CIL071	Long Stratton Parish Council	Yes	South Norfolk	Noted	No Change
CIL072	The Planning Bureau Ltd on behalf of McCarthy and Stone		All	Noted	No Change
CIL074	Taverham Parish Council	Yes	Broadland	Noted	No Change
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	No There are clear advantages for commercial operators who operate in Zone A compared with those who operate in Zone B. Zone A operators should pay considerably more than those in Zone B. Similarly Diss and Harleston should have their own Zone for non-residential development.	All	The evidence suggests that viability of non-residential development is generally low but also can be highly variable – with differences too fine grained to enable a zonal approach. It is expected that development with a high degree of viability could contribute to infrastructure needs through additional S106 contributions	No Change

Question 3: The viability evidence supports two charging zones for residential development, Zone A and Zone B. The Norwich City Council area falls entirely in Zone A. Broadland District Council and South Norfolk Council areas are within Zone A and Zone B. Do you agree with the boundaries for the charging zones?

Total number of response: 38

Yes: 16 No: 17 Comment: 5

Summary of Issues Raised:

- Concern has been raised that having a boundary with differing charging zones and rates will incentivise development to occur in the outer zone (Zone B) as the CIL rate is less in the outer zone.
- Two representations consider that the rates should reflect the costs associated with development on brownfield sites or previously developed land. One proposes a further inner city rate and the other is less clear on the remedy.
- Some respondents assumed that the charging zones boundary also applied to infrastructure spend.
- There was some support for more zones and a more graduated transition between the rates proposed in zone A and B.
- Others felt that the evidence did not support the boundary proposed and in, some instances, suggested local modifications.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr EA Newberry	No What would this be based on	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed.	No change
CIL006	Thurton Parish Council	No Thurton Parish Council wishes to challenge the rationale to having 2 zones in South Norfolk. The cost of infrastructure to support growth will be equally high, if not higher, in zone B which covers the more rural areas. Thurton Parish Council cannot see the evidence for drawing the boundary dividing zones A and B, between most of Bergh Apton, and Thurton/Ashby St Mary both of which are classified as service villages. Thurton and Ashby St Mary lay immediately outside the zone A boundary. As one of very few service villages in this position, it is likely that developers will target Thurton and Ashby St Mary as lower CIL contributions will be advantageous to them. However, our infrastructure needs are no less than villages in zone A. If zones A and B are retained, the boundary should be redrawn to include Thurton and Ashby St Mary in zone A. Failure to do so will place our villages at a double disadvantage of facing excessive pressure for development (which may be hard to resist under the proposed new national planning framework) and less CIL contributions to pay for essential infrastructure.	South Norfolk	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change
CIL006	Thurton Parish Council	Additional response by Thurton Parish Council to GNDP consultation on the proposed Community Infrastructure Levy. Boundary between zones A and B in South Norfolk. You will have received comments from Thurton Parish Council, primarily regarding the proposed boundary between residential charging zones A and B in South Norfolk. Following clarification received at the very helpful briefing by GNDP organised by NALC on 01/11/2011, we are supplying the following information to support our assertion that Thurton and Ashby should be included in zone A. We now understand that judgements about the positioning of the boundary are determined by house prices. Recommendation: We conclude that there is probably a case for extending the southern boundary for zone A to include Seething, the remaining area of Bergh Apton, and Claxton along with Thurton and Ashby St Mary. However we have only researched the position in depth from Thurton and Ashby St Mary. Thurton Parish Council requests that the following evidence be accepted and that the villages of Thurton and Ashby St Mary are included in zone A. Evidence: A thorough search of property data bases; Mouseprice (Land Registry) Zoopla and Right Move has provided consistent evidence to support our assertion that the basis of the drawing of the boundary is not	South Norfolk	See above	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>"fine tuned" and does not reflect domestic property prices in Thurton and Ashby St Mary. The very limited amount of recent estate new build in this area, has resulted in , to some extent, us having to use proxies including historical data, village average sale prices (for all types of residential property) and property prices for dwellings which are not new build .However we have tried to provide the most relevant data available. Current average property values NR14 (Mouseprice)</p> <p>The Mouseprice (Land Registry) raw data for NR14 is available but the detailed commentary / analysis is not up to date. (2006) GVA state in their presentation to the GNDP Developers Forum in May that they have used Land Registry data to assess residential house prices.</p> <p>The boundary between zones A and B cuts through NR14. The NR14 population is 21,693 occupying 9,315 homes. Over 50% of properties are detached the majority of which are owner occupied. 10.1% are socially rented.</p> <p>Average current values: Size NR14 NR National 2 bed £169,000 £139,900 £163,500 3 bed £205,600 £169,600 £190,800 4 bed £287,100 £262,800 £344,000</p> <p>This demonstrates that while the average stock in the NR area is below the national average, the stock in NR14 is above the national average.</p> <p>Properties in Thurton and Ashby (Zoopla) v NR14 Due to low numbers of dwellings and low turnover, average house price data for 2 and 3 bed dwellings has been taken for the last 5 years. Almost all the properties in the villages are 2 and 3 bed. Thurton average £221,260 (20 properties sold) Ashby St Mary average £265,661 (18 properties sold) Average Thurton and Ashby St Mary £ 243,460 Average NR14 £187,300</p>			
CIL007	Stratton Strawless Parish Council	<p>Yes</p> <p>Except the zones should only apply to areas with settlement limits.</p>	Broadland	Regulations dictate that development that is CIL liable should pay. The presence or not of a settlement boundary is not a consideration.	No change
CIL014	V Shepherd, Managing Agent, Templemere Residents Association	<p>No</p> <p>Cannot see any reason for more than one charging zone as for non-residential. It is likely to distort development across the whole area.</p>	Broadland	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development</p> <p>The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	No change.
CIL014	Templemere Residents Association	<p>Comments made under Q15 that raise issues relating to this question.</p> <p>There is no difference in the needs of local people across those areas you are considering. If development is to be encouraged in order to kick start the economy etc. then charges across the whole GNDP area should be the same and that will also be easier to administer and should not encourage developers to build further out necessitating more road building etc.</p>	All	See above	No change
CIL020	Postwick with Witton Parish Council	<p>Yes</p>	Broadland	Support noted.	No change
CIL026	Marlingford and		South Norfolk	Support noted.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Colton Parish Council				
CIL027	Horsford Parish Council	Yes	Broadland	Support noted.	No change
CIL029	Orbit Homes	Yes At present time this seems sensible, but again will need to be reviewed as the economic climate changes. Potentially residential sales values on Greenfield, Zone B, sites will be higher than those that can be achieved in the formal Central Zone which are more likely to be brownfield sites with more challenging conditions and constraints, therefore potentially the CIL values need to be reversed to reflect this. As noted at Question 1, the review policy is positive in responding if this situation arises.	All	It is recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change.
CIL031	Norton Subcourse Parish Council	No It will skew development in the boundary areas by encouraging development just over the border into Zone B. The county boundaries will also have the same effect.	South Norfolk	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change.
CIL032	Salhouse Parish Council	No 1. PC feels boundaries appear to be arbitrarily drawn. No logic in way boundaries are drawn. 2. Existence of 2 zones with large charging disparity will produce distortions in demand for development and infrastructure. 3. 3.Should be more zones in order to have a more gradation approach to the charging schedule.	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure; however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change.
CIL033	Michael Sida	The earlier concept was for 4 zones (NCC, A11 corridor, Inner & Outer). I can see that keeping the amount of the 'charge' down in relative terms to the more desirable areas, (NCC & A11 corridor) will encourage developers to those areas. However I feel that subdividing Zone B (Inner & Outer or whatever) should be considered and to then enhance the charge rate for the Inner B. This, in the same relative terms, would have the effect of increasing the overall income. For an example, instead of setting all of Area B at the recession rate of £75, set the charge for Inner B at say something like £100 with Outer B to remain at £75.	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development The scales of growth in settlements are set out in	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				<p>the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	
CIL034	Newton Flotman Parish Council	<p>Lower charging in zone B could produce an incentive for developers to bring forward development at a greater distance from the city, thus demanding earlier investment in improvement of transport links, over a greater distance, when not enough CIL funds have been collected.</p> <p>More specifically, villages just outside zone A, like Newton Flotman, will be under pressure from developers for further residential development. This may be hard to resist if there is no five year land supply, as seems to be the case at present in South Norfolk.</p> <p>Viability evidence does not appear to be a factor generating differential tariffs for other types of development, so why is housing different?</p>	South Norfolk	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development</p> <p>The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	No change.
CIL035	Capita on behalf of Breckland District Council	<p>No</p> <p>Whilst the principle of multiple zones is supported, the current boundaries as set out in the draft schedule are not. These seem to have been developed on an aspirational basis and not on an assessment of viability. Further detail to support this view is set out in the response to Question 1 above.</p>	All	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development</p> <p>The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	No change
CIL036	Hale and Heckingham Parish Council	<p>No</p> <p>It will skew development in the boundary areas by encouraging development just over the border into Zone B. The county boundaries will also have the same effect.</p>	All	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development</p> <p>The scales of growth in settlements are set out in the JCS. This will provide robust policy protection</p>	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				<p>against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	
CIL038	Hugh Ivins, Planning Consultant	<p>No</p> <p>Within Zone B there are urban areas which should require a further Zone C and the Zone B levy should be proportionally spread between these two zones, ie slightly higher in Zone C (but lower than Zone A) with a lower Zone B.</p>	Broadland	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	No change.
CIL040	Ptarmigan Land	Yes	All	Support noted.	No change
CIL045	Morston Assets Ltd	<p>No</p> <p>As stated in our answer to question 1 we do not support the imposition of a higher charging rate for Zone A, as this will result in brownfield development sites within the Norwich City area bearing the same levy as Greenfield sites outside of the City.</p> <p>We consider that consideration should be given to the application of either a single charging schedule across the GNDP area (so the cost of CIL for brownfield sites is spread across all development sites within Norwich, South Norfolk and Broadland) or an additional (lower) charging schedule rate for the Norwich City area is developed, which reflects the higher costs associated with developing previously developed land.</p>	All	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. CIL is only payable on the net increase in floor area so redevelopment sites may not have to pay as much as an equivalent greenfield site.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	No change.
CIL046	Wroxham Parish Council	<p>Comments made under Q15 that raise issues relating to this question.</p> <p>We feel unable to respond by attempting to complete your response form, which mainly asks us to agree to defined charging rates or propose alternatives. We find that the period allocated for this consultation is altogether insufficient to arrive at such a conclusion. It seems to us that viability depends on an understanding of developers' costs and margins and an appreciation of market demand and price sensitivity which only developers can report on, although we accept that their response may be much prejudiced by availability of finance and shareholder pressures.</p> <p>However, we wish to express two areas of deep concern with the proposals:</p> <ol style="list-style-type: none"> 1. We believe that the demands on local infrastructure will vary considerably according to the location, size and nature of a development in terms of local geography and viability of existing infrastructure prior to the development. Accordingly we are not satisfied that a flat rate over two broad areas and the difference between them has been justified. We believe there needs to be scope to deal with local conditions. Thus, a development in an area where local infrastructure is already adequate and not under pressure makes less demand than one where it is already inadequate and under pressure. 2. We believe that allocation of a fixed and paltry rate of 5% to local town or parish is a failure to recognise the above point or localism policy. If neighbourhoods are to be encouraged to use imagination to create constructive proposals for development with the local support, they must feel able to call on funds to support such development and not see virtually all of diverted to macro projects created by District and County. 		<p>The rates are not based on the costs of providing infrastructure but the viability of development</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL047	Beyond Green Ltd	Yes	All	Support noted.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL047	Beyond Green	<p>Comments made under Q15 that raise issues relating to this question.</p> <p>Further to the response under Q13, we are sceptical that £750 per residential unit is a realistic assumption for the value of residual S106/278 in determining a viable CIL rate, especially for larger developments. This is because larger developments will typically incur disproportionately greater need for S278 offsite highway improvements, as well as the dedication of land which would otherwise have development value for community infrastructure at potentially no cost.</p>	All	Noted	No change
CIL048	Ashby St Mary Parish Council	<p><u>Executive Summary</u></p> <ol style="list-style-type: none"> 1. The parish of Ashby St Mary has been proposed to be placed in Zone B for the Community Infrastructure Levy. 2. The GVA presentation to the GNDP Developers Forum in May 2011 stated it had used Land Registry data of residential house prices used to determine its zone boundaries. Ashby St Mary parish council (Ashby PC) has gathered its own evidence from Land Registry sources to robustly test the fairness and correctness of this proposal. 3. Ashby PC is satisfied from the weight of evidence it has found, that, based on the adopted test of residential property prices, the boundary between zone A and B should be amended to place Ashby St Mary within zone A. <p><u>Introduction</u></p> <ul style="list-style-type: none"> • Ashby St. Mary parish council is aware it's neighbouring parish council, Thurton, has made it's own case regarding amending the proposed zoning area in South Norfolk. • In respect of the boundary between zones A and B in South Norfolk, it is understood from GVA that the measures used to position that boundary is determined by actual prices achieved rather than notional house prices. Ashby PC has therefore undertaken to seek and test all evidence to determine whether Ashby St. Mary warrants inclusion in zone B as currently proposed by GVA. <p><u>The NR14 area</u></p> <ul style="list-style-type: none"> • As of the date of this submission the NR14 area contains approximately 22,000 residences and 9,500 occupiers. • The NR14 postcode district lies within or includes part of the following towns, counties, localities, electoral wards and stations: Alington, Arminghall, Ashby St Mary, Bixley, Bracon Ash, Bramerton, Brooke, Caistor St Edmund, Carleton St Peter, Chedgrave, Chedgrave and Thurton, Claxton, Dunston, East Carleton, Framingham Earl, Framingham Pigot, Gillingham, Haddiscoe, Hales, Hardley, Heckingham, Hellington, Hethel, Holverston, Kirby Bedon, Langleigh, Loddon, Markshall, Mulbarton, Mundham, Newton Flotman, Norfolk, Norton Subcourse, Norwich, Poringland, Poringland with the Framinghams, Raveningham, Rockland, Rockland St Mary, Sisland, Sprowston East, Stoke Holy Cross, Surlingham, Swainsthorpe, Swardeston, Thorpe Next Haddiscoe, Thorpe-Next-Haddiscoe, Thurlton, Thurton, Trowse, Yelverton. • Ashby St Mary is situated towards the north eastern edge of the postcode district NR14. NR14 is believed to be one of the largest, if not the largest, NR area of Norfolk in terms of land mass. It is reasonable to conclude therefore, that average property prices taken for the whole NR14 area will contain a huge imbalance of property prices having regard to the size of that area and the infinite types of property within it. The NR14 area contains domestic housing of all ages and constructions, including council-owned property, leasehold and freehold dwellings. • The NR14 areas of closely populated, developed centres include Chedgrave, Framingham Earl, Hales, Poringland, Loddon, Mulbarton, Newton Flotman, Stoke Holy Cross and Swardeston where, inevitably, a much greater turnover of property sales have taken place when compared to the rural parish of Ashby St Mary and, indeed, its neighbouring parish of Thurton. • It is noted that the zoneA/zone B boundary is currently shown as splitting the NR14 postal district. <p><u>Ashby St Mary</u></p> <ul style="list-style-type: none"> • Ashby St Mary is a large widespread parish with no 'centre' that has 123 residences and approximately 250 occupiers. • A very high proportion of properties in Ashby, estimated to be 90%, are detached. The majority are older type, freehold dwellings in private ownership. 		<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p> <p>The evidence provided is unfortunately does not provide sufficient detail on size scale location and age to justify a change in boundary.</p>	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action																
		<ul style="list-style-type: none"> The make-up of the parish is such that the majority of properties are scatter-situated and not built in 'estate' clusters. In the 1990s, 32 houses were built by Bovis on a development comprising two new roads. The most recently built properties in the parish are believed to be two bungalows on Mill Road, Ashby St Mary built approximately ten years ago. <p><u>Evidence providers</u></p> <ul style="list-style-type: none"> To examine whether zone A is correct and fair for Ashby St Mary, Ashby PC has sought evidence of actual property prices of domestic property in its parish including the following internet-based providers as reliable sources for land registry entries and other information to assist in its examination of this subject – Home, Houceladder, Nethouseprices, Ourproperty, Mouseprice, Rightmove, Upmystreet, and Zoopla. <p><u>Property sales evidence in Ashby</u></p> <ul style="list-style-type: none"> From the evidence Ashby PC has found, property sales in the parish unsurprisingly reflect either its older, established, more scattered dwellings or in the steady turnover of the more modern Bovis-built properties in the St Marys Road and Foxglove Close development. With no newly built properties, no such sales evidence exists. In the opinion of Ashby PC, the dearth of new or recently built domestic property in Ashby has resulted in low numbers of annual property sales compared to the average in the rest of the NR14 area. This is hardly surprising given that many places in NR14 contain areas of higher density buildings of proportionally lower values (than Ashby), where turnover is naturally much higher. <p>2011 Ashby sales evidence (Source: Houceladder) £235,000; 229,725; 224,975; 210,000; 212,498; 215,000 (6 properties) Year average = £221,200</p> <p>2010 Ashby sales evidence £290,000; 259,000; 226,500; 330,000; 194,995; 317,000 (6 properties) Year average = £269,582 Average 2011 to 2010 = £245,391 (12 properties)</p> <p>2009 Ashby sales evidence £140,000; 210,000; 189,950; 395,000 (4 properties) Year average = £231,237 Average 2011 to 2009 = £241,852 (16 properties)</p> <p>2008 Ashby sales evidence £290,000 Year average = £290,000 Average 2011 to 2008 = £244,684 (17 properties)</p> <p>2007 Ashby sales evidence £297,500; 345,500; 270,000; 152,500 (4 properties) Year average = £213,100 Average 2011 to 2007 = £248,816 (21 properties)</p> <p>2006 Ashby sales evidence £252,990; 360,000; 225,000; 228,000; 247,000; 285,000; 249,995 (7 properties) Year average = £263,997 Average 2011 to 2006 = £252,611 (28 properties)</p> <p>Excluding the incomplete 2011 sales evidence, which in itself reflects the continuing depressed property market conditions, the average sales figure of a property in Ashby for every year between and including 2006 to 2010 is in excess of £240,000.</p> <p><u>Other property price evidence</u></p> <ul style="list-style-type: none"> <u>Average current values – land registry figures</u> (Source: Mouseprice - updated 1st October 2011): <table border="1"> <thead> <tr> <th>Size</th> <th>NR14</th> <th>NR</th> <th>National</th> </tr> </thead> <tbody> <tr> <td>2 bed</td> <td>£169,000</td> <td>£139,900</td> <td>£163,500</td> </tr> <tr> <td>3 bed</td> <td>£205,600</td> <td>£169,600</td> <td>£190,800</td> </tr> <tr> <td>4 bed</td> <td>£287,100</td> <td>£262,800</td> <td>£344,000</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <u>National average property price</u> April – June 2011 (Source: BBC) £179,693 <u>NR average property price</u> (Source: Zoopla.co.uk) £182,148 (1 yr) 181,988 (3 yrs) 185,384 (5 yrs) 	Size	NR14	NR	National	2 bed	£169,000	£139,900	£163,500	3 bed	£205,600	£169,600	£190,800	4 bed	£287,100	£262,800	£344,000			
Size	NR14	NR	National																		
2 bed	£169,000	£139,900	£163,500																		
3 bed	£205,600	£169,600	£190,800																		
4 bed	£287,100	£262,800	£344,000																		

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>April – June 2011 (Source: BBC) £198,906</p> <ul style="list-style-type: none"> NR14 average property price (Source: Home.co.uk) January 2010 – July 2011 £221,879 All the other property price evidence found (produced above) demonstrates the 2010-2011 average value of property in Ashby St Mary of £245,391, exceeds that of the average for both NR14 and the whole NR postal district. <u>Other parishes currently in zone B warranting zone A inclusion</u> Ashby PC has seen and supports the view expressed by Thurton PC on this aspect and the following is offered as supplementary evidence. Ashby PC contends that there are other higher value areas currently outside zone A, reinforced by average house price sales for neighbouring villages, which warrant inclusion in zone B, such as - <ul style="list-style-type: none"> Claxton (NR14) £379,300 2010 – 09.2011 Seething (NR15) £247,700 2010 – 08.2011 (Source: Zoopla) Ashby PC notes Bergh Apton is shown largely within zone A but with part of its village also shown in zone B. It finds it difficult to support, and somewhat puzzling, to split a parish into different zones. In the same way, it understands the view of Thurton PC that Thurton and Ashby should be treated as joined up for the process of the zoning boundaries as the boundary between the two parishes divides its single most residentially-developed road where it joins the busy A146. <u>Conclusion</u> Ashby PC considers all its evidence to the GNDP consultation to be directly of relevance to its proposal. It is the weight attributed to that evidence which determines how compelling it is and in the view of Ashby PC the evidence is strong. Ashby PC supports the view submitted by Thurton PC that there is a case for extending the southern boundary for zone A to include Thurton, Claxton, Seething and the remaining area of Bergh Apton, along with Ashby St Mary. Ashby PC recommends this extension be adopted. The conclusion of Ashby PC is that there is ample, compelling evidence to support the view that Ashby warrants being included within zone A. Accordingly Ashby PC requests the boundary of zone A and B be changed to place the parish of Ashby St Mary in zone A. 			
CIL050	Dickleburgh and Rushall Parish Council	Yes		Support noted.	No change
CIL052	Cecil Elliston Ball, Town Planning Intelligence, on behalf of Zurich Assurance Limited	No There are advantages and disadvantages of adopting a zoning system. The proposed boundaries are based on the fact that there is a reasonably distinct difference in gross development value, and hence land value, between Norwich and its surroundings, illustrated in the current residential market by house price differentials. A finer level of analysis however will blur that distinction, and at individual site level there will always be winners and losers against a standard CIL rate. Any boundary is going to look arbitrary on a map, and it's difficult to see how that could be avoided. One of the factors that will change the pattern of property values is implementing the infrastructure financed by CIL. Given that this infrastructure is seen as strategic to the whole area we are not convinced that a broad geographical differential is justified, and a single rate should be applied across the whole Greater Norwich Area.	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change
CIL053	Diss Town Council	Yes Diss Town Council has no particular view on the boundaries for the charging zones	South Norfolk	Noted.	No change
CIL054	Aylsham Town Council	Yes	Broadland	Support noted.	No change
CIL055	Stephen Heard, Stop Norwich Urbanisation	No	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				differential charging rates and areas proposed. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	
CIL057	Norfolk Rural Community Council	No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted.	No change
CIL058	Alan Richard Williams on behalf of Stop Norwich Urbanisation	No The viability has already been queried by the response to Question 1. These boundaries seem somewhat arbitrary with some locations clearly being disadvantaged. Whilst the rationale used in Section 6 appears a perfectly reasonable extension of the market rate basis, questions remain. The A Zone extends well beyond the Areas of Major Growth. The only offset seems to be that the City centre and A11 corridor which have high market values will be paying a lower rate than they should.	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	No The justification for reducing the Zones to two appears flawed. The disparity between average house prices between the locations considered by GVA could actually have a significant effect on land value. Sensitivity analysis in an appraisal shows that small increment changes of say £5 per sq ft in value, can affect land values by 59%. We show this effect in our appraisals attached at Appendix 6 .	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. Further verification of the evidence and its underlying data has been carried out. The evidence provided shows how sensitive the assessment of viability is to sales price. This is not disputed, however a review of the GVA and others evidence shows the viability assessments are far less sensitive to the rate of CIL. It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change.
CIL063	The Leeder Family	Yes Yes, this reflects the impact of residential land values and the focus of areas included in Zone A on Norwich and the A11 corridor. The inclusion of Long Stratton in Zone B reflects its location on the edge of the NPA and relationship to a largely rural hinterland. The improvements that are part CIL funded and part Section 38 funded for Long Stratton is a fair reflection of the accepted strategic status of the A140 corridor within the Adopted Core Strategy and long term requirement for a bypass to enhance the environment locally and the role the A140 plays in supporting growth in the region and NPA. The requirement for a bypass as a pre-requisite to growth in Long Stratton of 1,800 dwellings and land that delivers a bypass will support strategic growth without further detrimental impact on conditions in the village. This is infrastructure that would otherwise not have been able to be funded through CIL or other public sector sources.		Noted.	No change
CIL066	Mr A B Walker	Yes	All	Support noted	No change
CIL067	Redenhall with Harleston Town Council	Yes	South Norfolk	Support noted	No change
CIL068	Bunwell Parish Council	No The viability evidence has not looked at the comparative house prices in the relevant areas which indicate	Broadland South Norfolk	The evidence presented by the parish council is based on an assessment of data from the ONS website. The data available is an area by area	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>that many parts of Zone B have house prices higher than in parts of Zone A.</p> <p>They have looked at these sources evidence sources such as VOA data, PROMIS, Rightmove, EGi and Focus. The work also focuses on those areas of contention i.e. the geographical areas where a charging zone boundary might fall." But have failed to look at the obvious sources such as http://www.neighbourhood.statistics.gov.uk/dissemination which give house prices at neighbourhood level. Thus Bunwell (Zone B) appears to be a desirable place to live with 1.3% 2nd Homes and a detached house price of £212K which compares with Shotesham (ZoneA) 1.5% 2nd Homes and £210K detached house price, Cringleford (Zone A) 0.9% 2nd Homes and detached price of £245K; Costessey (A) detached house price of £190K; Hethersett (A) detached house price of £213K.</p> <p>The above evidence would indicate that at least some and probably a lot of the Zone B villages are highly desirable places to build and raising the CIL to at least that of Zone B and perhaps even higher would not prove to be a deterrent to development. This is particularly so as in these areas any developments are likely to be small (under the 5 houses which trigger the 20% affordable housing obligation) and therefore unlikely to create many affordable houses in the villages and saving the 'developers' a lot of money. There are also unlikely to be any other Section 106 obligations imposed and so there is case for making the CIL higher than in Zone A in these villages (and most certainly in Bunwell) and there is absolutely no case for making it lower than in Zone A.</p>		<p>summary. In carrying out the viability work detailed data on individual transactions has been interrogated and allows other factors that affect price to be understood.</p> <p>As an example detached houses in the data can be of any age and will vary greatly in terms of plot and building size. The more detailed analysis has allowed these effects to be understood and supports the proposed structure of 2 charging zones.</p> <p>It is recognised that very small sites could have the advantages outlined, however, these will also apply to small scale sites in Zone A. Very small sites will be "windfall" development as it can be expected that the vast majority of allocated sites in both Zones will be for 10 or more dwellings and therefore required to provide affordable housing and subject to other site related costs.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	
CIL069	Kate de Vries, on behalf of the Broadland Community Partnership	<p>Yes</p> <p>No Comment – the BCP is not a body with the expert knowledge to question this recommendation</p>	Broadland	Support noted.	No change
CIL070	Cringleford Parish Council	Yes	All	Support noted.	No change
CIL071	Long Stratton Parish Council	Yes	South Norfolk	Support noted.	No change
CIL072	The Planning Bureau Ltd on behalf of McCarthy and Stone	<p>No</p> <p>The boundaries CIL Residential Charging Zones as proposed by the Greater Norwich Development Partnership are, at present, unsuitable and prejudice the development of previously developed land in the area.</p> <p>Zone A is principally based around urban areas, including most of Norwich City and its surrounding hinterland. It would appear that the Council has based its Zonal boundaries solely on the basis that areas with higher land values, which can accordingly support higher CIL contributions.</p> <p>National planning policy guidance within PPS3: Housing prioritises the re-use of previously developed land over greenfield land with Paragraph 40 stating "a key objective is that Local Planning Authorities should continue to make effective use of the land by re-using land that has been previously developed". We assert that by providing a lower CIL rate in rural areas, the Council is in effect subsidising the development of greenfield rural land over brownfield, urban areas. This is completely at odds with PPS3 and the concept of sustainable development.</p> <p>McCarthy and Stone Retirement Lifestyles Ltd develop specialist accommodation for the elderly. This requires specific locational criteria, as per the recommendations of the joint advisory Note of the National House Builder's Federation and the National Housing and Town Planning Council entitled – "Sheltered Housing for Sale" (1998).</p> <p>Crucially, specialist accommodation for the elderly should be located in areas with easy access to goods, services and public transport facilities and as such well located specialist housing schemes for the elderly are located in urban areas, preferably close to town centres. We feel that the proposed CIL rate prejudices this form of much needed development.</p>	All	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. CIL is only payable on the net increase in floor area so redevelopment sites may not have to pay as much as an equivalent greenfield site.</p> <p>It is also recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.</p>	No change.
CIL074	Taverham	Yes	Broadland	Support noted.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Parish Council				
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	No	All	Noted. It is recognised that values are quite variable throughout the area and there are parts of the outer zone with high values.	No change

Question 4:	4a: It is intended that the rate of charge for residential development in Zone A will be within a range of £135 to £160 per m2. What do you think the rate should be?
	4b: What is your justification for this rate?
Total number of response:	
4a: 25	
4b: 26	
Summary of Issues Raised:	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL004	County Land and Business Association Ltd	Q4b: We are concerned that this category covers all residential development with the sole exception of affordable housing. There are a number of situations where new rural dwellings are required to accommodate those employed in agriculture, horticulture and forestry. Such properties are not sold for development gain and are usually restricted by some form of occupancy condition. In such cases, a charge of £135/m ² to £160 per m ² would simply be an additional cost of construction and is likely to render many such projects unviable. As these properties are crucial to the operation of rural businesses and sustainable rural communities, we ask that they be considered separately, based on a suitable viability assessment, or classified with affordable housing for CIL purposes.	All	There is no differentiation for dwellings with a restrictive occupancy condition. No viability evidence has been provided to demonstrate the comments made on viability.	No change proposed.
CIL007	Stratton Strawless Parish Council	4a See Note 4b The rate should be appropriate to cover the cost of planned Infrastructure of the development and not a rate of one price suits all.	Broadland	Regulation dictates that the rate of CIL should be not be set beyond the level of viability. The evidence the supports the consultation clearly shows that the cost of infrastructure is greater than can be collected from a viable rate of CIL. The viability evidence supports the range of charged proposed within the inner charging area.	
CIL014	Templemere Residents Association	4a Less 4b This will put developers off building in Norwich and that is where the infrastructure is best able to support development.	Norwich	No evidence is provided to demonstrate that this will be a significant issue. Values tend to be higher in central areas, counteracting the tendency to higher costs. Brownfield sites can also benefit from existing utilities, access and services. CIL will only be payable on the net increase in floor space on site with an existing lawful use.	No change
CIL019	IE Homes and Property	See my comment in question 1 – it needs to be re assessed based on realistic land values.	All	If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. The lower of the Zone A residential CIL rates is discounted from the maximum proposed by GVA to take account of the lack of clarity around economic recovery. Further evidence is being gathered on residential viability.	Review proposed residential CIL rates taking account of latest evidence.
CIL020	Postwick with Witton Parish Council	4a 135 4b Incentive is required to build new housing	All	Noted.	View to be taken into account in setting a rate.
CIL027	Horsford Parish Council	4a As above To ensure that developments contribute to amenity and infrastructure improvements necessary to absorb the development.	Broadland	Noted.	View to be taken into account in setting a rate.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL031	Norton Subcourse Parish Council	4a Please see below Q4b: The incremental cost per capita of providing infrastructure and services for each additional person taken across the whole of Norfolk and Norwich. We believe the charge should be same across both areas and indeed all of Norfolk	South Norfolk	The rate is based on viability evidence. That evidence also supports the rationale for 2 separate charging zones that reflect variation on viability between Norwich and the more rural areas of South Norfolk and Broadland. It is outside the remit of this consultation to consider a rate of CIL beyond the administrative boundaries of Norwich City, South Norfolk and Broadland Councils.	No change.
CIL033	M Sida	4a As it is	All	Noted.	View to be taken into account in setting a rate.
CIL034	Newton Flotman Parish Council	4a As much as developers can stand Question 4b: It's a market place. This also applies to Zone B, if it is to exist.	All	The rate is based viability evidence of development and the rates proposed strike a balance between securing funding for infrastructure and not rendering contributing development unviable. Viability evidence also supports the rationale for 2 separate charging zones that reflect variation on viability between Norwich and the more rural areas of South Norfolk and Broadland.	View to be taken into account in setting a rate.
CIL035	Capita Symonds on behalf of Breckland District Council	4b: Breckland Council's response is concerned with the rate and delineation of Zone B as an adjoining authority and as such will limit comments on Zone A	All	Noted	
CIL036	Hale and Heckingham Parish Council	4a Please see below The incremental cost per capita of providing infrastructure and services for each additional property should be taken across the whole of Norfolk and Norwich. We believe the charge should be same across both zones and indeed all of Norfolk On brownfield sites where buildings have been demolished – building houses will require infrastructure, so why is no CIL applied here?	All	The rate is based on viability evidence. That evidence also supports the rationale for 2 separate charging zones that reflect variation on viability between Norwich and the more rural areas of South Norfolk and Broadland. It is outside the remit of this consultation to consider a rate of CIL beyond the administrative boundaries of Norwich City, South Norfolk and Broadland Councils.	No change
CIL040	Ptarmigan Land Ltd	Approximately £100 per m2 Question 4b: Recent developments in the GNDP area have typically been paying S106 contributions of £5,000 - £7,000 per house. If an average house is assumed to be 100m2 then this would equate to an average of £50/m2 - £70m2. At this level many development in Norfolk are marginal in their financial viability. To therefore suggest that CIL can be charged twice as much (even once you have factored in the exclusion of the affordable housing units) as the current S106 system is completely unrealistic. It is accepted that there needs to be a balance between the need to fund infrastructure and the economic viability of developments but if the CIL is charged at too high a level developments will not come forward which in turn means infrastructure cannot be delivered. As per the comments in Question 1 the evidence base prepared by GVA needs to be redone to assess how much developments can really afford in terms of CIL?	All	See GNDP response to Q1 CIL040	
CIL045	Morston Assets	4a £100 per m2 4b We consider that a rate of £100 per m2 would be more appropriate within the Norwich City area (a higher rate could be applied to development land outside of the City Council's administrative area but within the Norwich Policy Area), and would more fairly reflect the higher costs associated with bringing forward development on brownfield sites. Similar rates have been proposed by other charging authorities for urban development sites such as Redbridge (rate of £70 per m2 for residential development) and Croydon (rate of £120 per m2 for	All	It is accepted that the costs associated with bringing forward brownfield sites are different from greenfield. However these do not necessarily lead to the conclusion that the rate of CIL should be varied. Regulations state that CIL is only payable on the net increase in floor area so redevelopment sites may not have to pay as much as an equivalent greenfield site. Brownfield sites also enjoy existing service and highway connections that would not	No change proposed.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		residential development) and we consider that a rate set at this level for sites within the Norwich City area would be more appropriate.		exist for greenfield sites.	
CIL047	Beyond Green Ltd	4a 135 4b Question 4b: We accept the the logic set out in paragraphs 7.7 to 7.15 of the “Background and Context” paper, with one important exception (see response to Q15 below). This exception does not, however, alter the general acceptability of the lower rate of CIL of £135 proposed for the immediate future, as it would a higher rate of £160. We consider that £135 represents a cautious rate at which to introduce CIL and a sensible basis on which to conduct a review within two years based on empirical evidence.	All	Noted	No change
CIL050	Dickleburgh and Rushell Parish Council	We have insufficient knowledge on the economics of house building to comment on the rate.	South Norfolk	Noted	No change
CIL051	Spixworth Parish Council	Comments made under Q15 that raise issues relating to this question This Parish Council (in the Broadland District Council area) considered this consultation at a recent meeting and concluded that “any charge on developers would eventually be passed on to buyers, and this would drive up the price of housing. It was AGREED to respond that the rate proposed (£135-160 per m ²) was too high.” It had no other comments to offer on the consultation.		CIL is not a wholly new charge. The impact is likely to be largely on land values rather than house prices. It should be noted that the vast majority of transactions are previously owned properties and these are likely to be more significant in establishing market prices.	No Change
CIL052	Town Planning Intelligence on behalf of Zurich Assurance	4a £99.00 4b As stated in our answer to question 3, we do not agree with the division of the area into Zones A and B, and that a single rate should be applied across the whole of the Greater Norwich Area. Our instinct is that a rate that works out at £15,000 for an average size dwelling is too high, especially in current market conditions. Whether such a figure would look more comfortable during a period of buoyant growth is another question. However, conditions for the foreseeable future look sluggish at best, and introducing rates at the level suggested feels to us like a disincentive. The government is looking to the development industry as an important economic motor to get the national economy out of stagnation. Without looking at our own land holdings in more detail, it's difficult to say what would feel comfortable, but our suggestion is a rate that is psychologically the right side of £100 per square metre. As a result, the planned infrastructure programme would have to be heavily focussed on priorities at the top of the list. Assuming that a lower than expected tariff helps kick start growth, it could establish a virtuous circle that will allow an upward review at a relatively early date and a consequent expansion of the infrastructure programme.	All	The rate is based on viability evidence. That evidence also supports the rationale for 2 separate charging zones that reflect variation on viability between Norwich and the more rural areas of South Norfolk and Broadland. Our evidence indicates that a CIL rate of £160/m ² for residential development in zone A would be viable. The range gives the opportunity for the balance to be struck between not slowing the market and maximising funding to deliver infrastructure. Whilst £99 may be appealing psychologically, it is not founded on evidence to challenge the work carried out in preparing the draft charging schedule.	View to be taken into account in setting a rate.
CIL054	Aylsham Town Council	4a No comment	Broadland	Noted	No change
CIL055	Stephen Heard on behalf of Stop Norwich Urbanisation	4a £0 4b This CIL is a tax that along with the new Homes Bonus should not be applied. All it is designed to do is backfill the reserves of local authorities that have used taxpayers monies and their existing reserves to cap council tax for 2 years. If this tax is set at zero and no new homes are built then the local councils will be bankrupt in 3 years time.	All	CIL income is to provide infrastructure to support the development of the area. The evidence base includes work on infrastructure requirements and viability. Evidence clearly shows a CIL is viable and will provide a stream of funding for infrastructure required to support planned growth.	No change
CIL057	Norfolk Rural Community Council	4b: No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted	No change
CIL058	Richard Williams on behalf of Stop Norwich Urbanisation	4a There is too much uncertainty to say 4b: It must be higher than the figure quoted because there is already provision for the rate to be increased(Para 7.15) So there is already an inherent defect in the proposals since these rates were set at a level which covered	All	The CIL rate is based on viability evidence and needs to strike the right balance between funding infrastructure and not being a disincentive to development.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>the shortfall in public funding. By this argument it would appear that this is not a finite process and that the Government could seek to divest itself of all the obligations that it can foist onto local communities.</p> <p>Such an open ended commitment should surely be resisted by the local representatives.</p> <p>The higher the rate the greater the disincentive to development.</p>			
CIL062	Savills (L&P) Ltd on behalf of Easton Landowners Consortium in conjunction with Norfolk Homes and Endurance Estates	<p>4a 63.50</p> <p>4b: In the absence of clear and transparent information from GVA on their appraisals, we have undertaken our own appraisal on the basis of a hypothetical scheme of 250 dwellings (as per their Scheme 4 Development Typology). We have used the following assumptions:</p> <ol style="list-style-type: none"> 1. For the purposes of the appraisal, we have used the average floor area per unit of 90m², in accordance with the Charging Schedule background evidence. 2. 33% affordable housing, of which 70% is social rent and 30% is intermediate tenure. 3. The value of the affordable housing is equivalent to an average of 65% of Market Value across intermediate and social rent, reflecting the averaging of social rent being valued at 75% of Market Value and intermediate tenure being valued at 40% of Market Value. 4. We have used GVA's assumed build costs of £860 per m², even though we believe these to be too low (they should be more like £85 per m²). 5. We have assumed values equivalent to £1,991 per m² (185 per ft²). 6. Given the scale of the development, there will be site servicing costs in the order of £100,000 per acre. 7. NHBC warranties are included at £140 per dwelling. 8. £750 per market dwelling has been incorporated, although we understand that the GNDP believe this figure will apply to both market and affordable homes. <p>A copy of the appraisal summary is included in Appendix 6.</p> <p>To calculate the amount available for CIL payments, we have used the following methodology:</p> <ol style="list-style-type: none"> 1. We have taken the benchmark land value for a Zone A development to be as high as £500,000 per acre (as per GVA's recommendations), based upon a relatively high density scheme of 55 dwellings per hectare. 2. This is therefore roughly equivalent to £23,000 per plot. 3. We have then applied this to the hypothetical scheme at an assumed density of 35 dwelling per hectare, which we believe to be a more realistic density given market conditions and demand profiles. 4. This therefore equates to around £322,000 per acre. 5. Taking the assumption that a landowner would be prepared to sell at a value up to 25% less than Market Value (as per GVA's assumptions), this reduces the land value to £241,500. 6. We have incorporated a fixed land cost of £241,500 per acre for an 18 acre scheme (based on 35 dwellings per hectare). 7. The residual in the appraisal is therefore profit. Assuming a base developer's profit of 20% on cost (which we also believe to be very low), we can then calculate the amount of 'super' profit that could be available to pay for CIL contributions. <p>Given the above, the appraisal shows a profit of £7,124,400 on a cost of £30,869,773, equivalent to 23.8% profit on cost. Assuming a 'super' profit of 3.08%, therefore, this equates to £950,789. The total floorspace of market dwellings is 15,030m². This therefore equates to a potential CIL contribution of £63.26 per m².</p>	All	This evidence is very useful in assessing the proposed CIL rates.	Review proposed residential CIL rates taking account of this evidence.
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	<p>Comments made under Q15 that raise issues relating to this question</p> <p>We agree with the principle of CIL as a transparent method of filling the infrastructure funding gap but it has to be set at a level which will enable development going forward to fulfil the GNDP housing requirements and provide affordable housing at the required 33% where possible.</p> <p>We have studied the five year land supply and plotted the proposed development sites on the CIL Charging Zone Map. From this exercise, we have found that all the development land over the next five years is within Zone A. Of this only two sit outside the former Inner Area as allocated by GVA. Whilst we have not assessed each one individually, from our knowledge of Norwich, we can see that the vast majority are brownfield sites, thus requiring some form of demolition and/or remediation. This puts a maximum of 63.97 hectares (3,636 units) at risk from the viability miscalculation. Assuming 33% affordable housing, this amounts, potentially, to the loss of 1,200 affordable units over the next five years.</p>	All	<p>The majority of brownfield sites that come forward in the immediate future are likely to have permission or gain permission before CIL is introduced. CIL is only payable on the net increase in floor area so redevelopment sites may not have to pay as much as an equivalent greenfield site.</p> <p>CIL is not an entirely new additional charge and will largely replace S106 on many developments. It is accepted that there is a balance to be struck to minimise upward pressure on house prices. Under the proposed rate of CIL some will pay less than under the existing system of obligations and</p>	Review proposed residential CIL rates taking account of latest evidence.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>The viability approach by GVA is so flawed that, even where there is potential for sites to come forward at the proposed level of CIL/Tariff, it is very unlikely that there will be any "surplus" in the development to provide anywhere near the required level of affordable homes. If CIL/Tariff is set but Section 106 obligations are still subject to viability arguments, then affordable housing is the most obvious casualty.</p> <p>CIL will be used to fund infrastructure required to enable development across the GNDP area. Due to the phasing of development, this infrastructure has to be forward funded by the charging authorities. If the proposed charging schedule is adopted, there is a clear and significant risk that much of the envisaged development will simply not come forward. The charging authorities are therefore at great risk of incurring huge debt with no guaranteed way of servicing it.</p> <p>It needs to be understood that even if house prices do rise to 2007 peaks or beyond, the development world is a very different place now. The Code for Sustainable Homes, general rising build costs, reduction in labour pools, the reluctance of land owners to sell, the significantly low level of transactions, the lack of finance and the cost of finance are all factors which both commercial and residential developers have to contend with. The CIL/Tariff is a reasonable way in which to fund infrastructure but it would be inequitable for it to be set at a level which reflects an economy and development world of four years ago and then be set to rise on an index linked basis.</p> <p>We understand that this exercise is about viability in this area and, therefore, comparisons with other charging authorities are difficult. However from those CIL/Tariffs that have been set, the GNDP area appears high other than when compared with LB Wandsworth, even those which are closer to London and therefore benefit from much higher land and property values.</p>		<p>others will pay more.</p> <p>Latest published research published by Savills in December 2011 indicates signs of recovery in the Norwich housing market and forecasts price growth over the next 5 years.</p> <p>This consultee provided detailed viability evidence which is being considered alongside the GVA evidence to arrive at appropriate rates of CIL.</p>	
CIL065	Old Catton Parish Council	4a It should be adequate		Comments noted. The CIL rate is based on viability evidence and needs to strike the right balance between funding infrastructure and not being a disincentive to development. Evidenc	No Change
CIL066	Mr A.B Walker	4a Agree	All	Noted	No change
CIL067	Redenhall with Harleston Parish Council	4b: Not applicable to us we are in zone B	South Norfolk	Noted	No change
CIL068	Bunwell Parish Council	<p>4a £160</p> <p>4b. The difference between the two rates on a 90Sq M house is just £2,250 and is insignificant in comparison with the yo-yo of house prices amounting to little over 1% of the average detached house price. However it amounts to more than £83 million more for infrastructure which is badly needed.</p>	All	Noted	View to be taken into account in setting a rate.
CIL069	Broadland Community Partnership	4a No Comment – the BCP is not a body with the expert knowledge to question this recommendation	All	Noted	No change
CIL070	Cringleford Parish Council	<p>4a £160</p> <p>4b The rising cost of providing the infrastructure</p>	All	Noted	View to be taken into account in setting a rate
CIL072	McCarthy and Stone	<p>Question 4b: The adopted Greater Norwich Core Strategy acknowledges that, in line with the rest of the Country, the population in the area is ageing. In light of the demographic issues detailed in the LDF's evidence base, the Council should include policies which encourage the development of specialist accommodation for the elderly in order meet the increasing demand. Private sheltered accommodation schemes specifically for the elderly, such as those developed by McCarthy and Stone, have a key role in addressing the District's future housing needs.</p> <p>Many forms of specialist housing accommodation, such as retirement living and extra care housing for the elderly, provide communal areas for residents at an additional cost to the developer. Specialist housing providers will also have to pay additional CIL monies for communal areas as opposed to other forms of residential development that will only pay on 100% saleable floorspace. This does not provide a level playing field for these types of specialised accommodation and means that a disproportionate charge in relation to saleable area and infrastructure need is levied</p> <p>We therefore propose that to ensure sufficient levels of specialist accommodation for the elderly are</p>		<p>The issue of communal areas is no different in specialist housing accommodation, such as retirement living from other flatted development. The management and upkeep of communal areas should be reflected in management charges and sales prices.</p>	No Change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		provided within the Greater Norwich area the CIL rate should be limited to the net saleable area for these types of development.			
CIL074	Taverham Parish Council	<p>The rising cost of providing the infrastructure</p> <p>Current Proposals are too high.</p> <p>If 106 agreements & affordable housing was applied to each development, developers would be less likely to build.</p> <p>The proposed levels impede development rather than encourage it.</p>	Broadland	CIL legislation has been introduced along with a scaling back of the scope of planning obligations that can be secured via S106 agreements. The CIL rate is based on viability evidence and needs to strikes the right balance between funding infrastructure and not being a disincentive to development. That evidence (available to consultees) show that a CIL within the range proposed is viable.	View to be taken into account in setting a rate
CIL076	United Business & Leisure Ltd & Landowners Group	<p>Not greater than £75/m2</p> <p>Any rate in excess of the sum referred to above will see a reduction in affordable housing or an un increase in house prices resulting in more people falling into the ever increasing pit of those requiring affordable houses.</p> <p>Greater income can be derived by bringing further areas or more development into Zone A, therefore re zone to bring Long Stratton into Zone A and define Zone A as the JCS defines the NPA.</p>	All	<p>The CIL rate is based on viability evidence and needs to strikes the right balance between funding infrastructure and not being a disincentive to development. That evidence shows that setting a CIL within the range proposed will not undermine viability of development that meets policy targets of 33% affordable housing.</p> <p>Evidence has demonstrates that it is reasonable to set 2 charging zones. There is no evidence to suggest Long Stratton should be in Zone A</p>	View to be taken into account in setting a rate

Question 5:	5a: It is intended that the rate of charge for residential development in the Zone B will be £75 per m2. Do you agree with this approach?
	5b: What should the charge be?
Total number of response: 35	
Yes: 11 No: 20 Comment: 4	
Summary of Issues Raised:	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr EA Newberry	5a No As per 4a	Broadland	See comment for 4a	No change
CIL003	CPRE	Comments made under Q15 that raise issues relating to this question Thank you for your letter of 28 th September 2011 inviting CPRE to comment on the Community Infrastructure Draft Charging Schedule. CPRE Norfolk has consistently opposed what it considers to be excessive housing targets in the GNDP Joint Core Strategy. It is our view that the 33,000 new houses planned for the Norwich Policy Area, many of which will be built on Greenfield sites, will have a severe adverse impact on the countryside surrounding Norwich. Attractive landscapes will be lost, light pollution will increase, rural tranquillity will diminish and traffic congestion will reach Home Counties levels. Of course it is right as a matter of principle for developers to pay for the infrastructure necessary for their estates to be built. But if housing numbers are too high the amount of new infrastructure required becomes excessive and will itself contribute to the suburbanisation of the countryside. We have not filled in the detailed response form but note that it is proposed that the Zone A Levy on residential development, at £135 per square metre, is almost double the Zone B rate (£75). This price differential is likely to encourage developers to build on the more rural Zone B sites first. CPRE would prefer to see incentives put in place that encouraged Brownfield sites that are located within existing development boundaries to be the first to be developed.		The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.	No change
CIL004	Country Land & Business Associations Ltd	5a No 5b We are concerned that this category covers all residential development with the sole exception of affordable housing. There are a number of situations where new rural dwellings are required to accommodate those employed in agriculture, horticulture and forestry. Such properties are not sold for development gain and are usually restricted by some form of occupancy condition. In such cases, a charge of £75/m ² would simply be an additional cost of construction and is likely to render many such projects unviable. As these properties are crucial to the operation of rural businesses and sustainable rural communities, we ask that they be considered separately, based on a suitable viability assessment, or classified with affordable housing for CIL	All		
CIL006	Thurton Parish Council	5a No The charge should be higher to reduce the difference between zones A and B. This would reduce the pressure for excessive development in zone B, which would be against the objectives of the Joint Core Strategy and would be less sustainable. 5b: £135-£160 per m2 Please see response to question 3	South Norfolk	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure; however it should be noted that as the boundary is set on	View to be taken into account in setting a rate.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				viability of development there should not be a significant differential in the attractiveness to develop between the two areas.	
CIL007	Stratton Strawless PC	5a: SEE PREVIOUS COMMENT FOR ZONE A.	Broadland	Regulation dictates that the rate of CIL should be not be set beyond the level of viability. The evidence the supports the consultation clearly shows that the cost of infrastructure is greater than can be collected from a viable rate of CIL. The viability evidence supports the range of charged proposed within the outer charging area. Action	No change
CIL009	Stockton Parish Council	5a Yes	South Norfolk	Support noted	No change
CIL014	Val Shepherd on behalf of Templemere Residents Association	5a No Should not be any different to zone A. 5b More Needs to be the same as the zone A rate.	All	Regulation dictates that the rate of CIL should be not be set beyond the level of viability. The evidence the supports the consultation clearly shows that the cost of infrastructure is greater than can be collected from a viable rate of CIL. The viability evidence supports the range of charged proposed within the outer charging area.	
CIL019	IE Homes & Property	5a No See as above comment in question 4.	All	If the CIL is adopted later in 2012 it will be unlikely to be payable on development until later in 2013 at the earliest and on larger permissions the charge will be payable over 2 years. The rates need to be suitable for market conditions likely to prevail at this time. Zone B residential CIL rates reflect the variation between Norwich and the more rural areas. .	Review proposed residential CIL rates taking account of latest evidence.
CIL020	Postwick with Witton Parish Council	Yes	Broadland	Support noted	No change
CIL026	Marlingford & Colton Parish Council		South Norfolk		
CIL032	Salhouse Parish Council	5a No Too large a differential in the charging schedules between zones A and B See response to question 3. 5b: The Parish Council does not feel qualified to answer 5(a) and 5(b) but feel there should be more parity between rates. See response to question 3.	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The rates are not based on the costs of providing infrastructure but the viability of development The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.	No change proposed
CIL033	Michael Sida	5a No Please see my answer to question 3 above. That is to establish an Inner & Outer B 5b Inner say around £100 & Outer £75 Increase in charge income because as it is closer to the 'smoke'	All	The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed. The	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				<p>rates are not based on the costs of providing infrastructure but the viability of development</p> <p>The scales of growth in settlements are set out in the JCS. This will provide robust policy protection against excessive development pressure, however it should be noted that as the boundary is set on viability of development there should not be a significant differential in the attractiveness to develop between the two areas.</p>	
CIL034	Newton Flotman Parish Council	<p>5a No</p> <p>5b Same as zone A</p>	All	<p>The rate is based viability evidence of development and the rates proposed strike a balance between securing funding for infrastructure and not rendering contributing development unviable.</p> <p>Viability evidence also supports the rationale for 2 separate charging zones that reflect variation on viability between Norwich and the more rural areas of South Norfolk and Broadland.</p>	Noted. View to be taken into account in setting a rate.
CIL035	Capita Symonds on behalf of Breckland DC	<p>5a No Breckland Council does not consider that the current figures for Zone B represents the most appropriate rate in light of available evidence.</p> <p>5b £100m2</p> <p>Evidence from Breckland Council's recent SHLAA update (2011) and initial CIL evidence base report suggests that sales values in rural areas and lower order market towns are of a sufficient level to accommodate a higher rate of CIL than is currently proposed by the GNDP. Using relatively conservative build costs (£815m2) and sales values (£1,700m2) Breckland calculates that a CIL rate of £100m2 could be charged whilst leaving a residual land value at a point at which a landowner would reasonably sell for.</p> <p>Breckland has evidence from its 'HomeTrack' system to indicate that locations in proximity to the district boundary are also achieving sales values in excess of the levels indicated above (such as Reepham, Hingham and Foulsham). This is further evidence that the GNDP's viability report underestimates development values and consequently arrives at a lower rate for CIL in these areas than would be expected.</p> <p>Therefore, schemes in areas such as Market Towns and Local Service Centre villages should not be assumed to be less viable without clear evidence, which has currently not been provided. It is recommended that further refinement of the evidence base takes place prior to the next iteration of the CIL report.</p> <p>Whilst it is recognised that setting a CIL rate is a balance between the desirability of securing funding and development viability, it is apparent that a more rigorous approach to assessing the delineation of boundaries between charging zones and values is now necessary in order to avoid unintentional cross-boundary effects.</p>	All	<p>A meeting has been with the respondent. Additional evidence is being provided to support the comments made.</p>	Noted. View and additional evidence to be taken into account in setting a rate.
CIL036	Hale and Heckingham Parish Council	<p>5a No</p> <p>5b See response to Q4</p>	All	<p>The rate is based on viability evidence. That evidence also supports the rationale for 2 separate charging zones that reflect variation on viability between Norwich and the more rural areas of South Norfolk and Broadland. It is outside the remit of this consultation to consider a rate of CIL beyond the administrative boundaries of Norwich City, South Norfolk and Broadland Councils.</p>	No change.
CIL038	Hugh Ivins	<p>5a No</p> <p>See Q3 above</p>	Broadland	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA,</p>	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>5b: £80 - £50</p> <p>The suggested levy reflects the fact that in Zone B the vast majority of development takes place within existing settlements with extremely limited development within the designated countryside.</p>		<p>commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed.</p>	
CIL040	Ptarmigan Land Ltd	<p>5a No</p> <p>5b: £85/m2 - £90/m2</p> <p>It is accepted that the housing sales values in Zone A are higher than Zone B but not by such a margin which would justify the CIL charge being twice as much.</p> <p>It's worth bearing in mind that development land values for Zone A will be considerably more than Zone B thereby reducing their over-all profitability. This is supported by the evidence GVA gathered as part of their "Viability Advice on CIL/Tariff (December 2010)" which quoted local agents saying that development land values (with planning consent) were typically £350,000 - £600,000 per acre.</p> <p>The difference in CIL rates should therefore reflect the difference in sale values which is approximately 10-15%. An increase in Zone B charges may help compensate the suggested decrease in the Zone A charge.</p>	All	<p>The rationale for two charging zones for residential development is based on a report prepared by GVA, commissioned to give an understanding of viability across the area. That evidence supports the differential charging rates and areas proposed.</p> <p>Further assessment of site viability carried out by the GNDDP, based on evidence provided shows that there is a relationship between house sales values and CIL but the relationship is not directly proportional as suggested.</p>	Response to be taken into account in setting rate for Zone B
CIL045	Morton Assets Ltd	<p>5a No</p> <p>No, we consider that the principle of a single higher charging rate for Zone A is inappropriate for the reasons given above. A lower charging rate within Zone B would only be appropriate if an additional charging area were introduced for the Norwich City area, to reflect the higher development costs associated with brownfield sites.</p> <p>Under the arrangements currently proposed, sites and locations that are less able to absorb additional development costs will be saddled with a higher rate of CIL.</p>	All	<p>It is accepted that the costs associated with bringing forward brownfield sites are different from greenfield. However these do not necessarily lead to the conclusion that the rate of CIL should be varied. Regulations state that CIL is only payable on the net increase in floor area so redevelopment sites may not have to pay as much as an equivalent greenfield site. Brownfield sites also enjoy existing service and highway connections that would not exist for greenfield sites.</p> <p>There is no evidence to support the introduction of a Norwich City charging area.</p> <p>The rate for Zone B is based on viability evidence of that area.</p>	No change proposed.
CIL047	Beyond Green ltd	<p>5a Yes</p>	All	Support noted	No change
CIL052		<p>5a No</p> <p>Please see answer to question 4b</p> <p>5b£99.00</p> <p>Please see answer to Question 4b</p>	All	<p>The rate is based on viability evidence. That evidence also supports the rationale for 2 separate charging zones that reflect variation on viability between Norwich and the more rural areas of South Norfolk and Broadland. Our evidence indicates that a CIL rate of £75/m2 for residential development in zone B would be viable.</p> <p>Whilst £99 may be appealing psychologically, it is not founded on evidence to challenge the work carried out in preparing the draft charging schedule.</p>	View to be taken into account in setting a rate.
CIL053	Diss Town Council	<p>5a Yes</p> <p>It is understood that striking the balance between the need for infrastructure investment and encouraging development is difficult, however if the CIL levy agreed at this time is to be relevant for the LDF period to 2026, then this amount is unlikely to keep pace with inflation and rising costs of delivering infrastructure over that period. Is there an intention to review the CIL rate in say five years time to ensure that it is relevant to the economic situation of the time?</p>	All	<p>The three councils intend to commit to an early review of CIL within two years of the adoption of the charging schedule, with a view to reviewing the rates to take account of market conditions.</p>	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL054	Aylsham Town Council	5a Yes	Broadland	Noted	No change
CIL055	Stephen Heard on behalf of SNUB	5a No 5b Zero. See above	All	CIL income is to provide infrastructure to support the development of the area. The evidence base includes work on infrastructure requirements and viability. Evidence clearly shows a CIL is viable and will provide a stream of funding for infrastructure required to support planned growth.	No change
CIL057	Jon Clemo on behalf of Norfolk Rural Community Council	5a: No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted	No Change
CIL058	Alan Richard Williams on behalf of SNUB	5a No 5b 1. See the comments to the previous question. 2. The rate discrepancy between these two zones is unsustainable	All	The CIL rate is based on viability evidence and needs to strike the right balance between funding infrastructure and not being a disincentive to development. The rationale for 2 zones is supported by evidence as is the proposed rate for zone B.	No Change
CIL062	Ciara Arundel & Melys Pritchett (Savills) In conjunction with Norfolk Homes and Endurance Estates on behalf of Easton Land Owners Consortium	5a No To be advised – due to the 5 year land supply policy, we have focussed on the Zone A rate, but we will provide feedback on this in due course.	All	Noted	No Change
CIL066	Mr A B Walker	5a Yes	All	Noted	No change
CIL067	Redenhall with Harleston Town Council	5a Yes	South Norfolk	Noted	No change
CIL068	Bunwell Parish Council	5a No Absolutely NO – see the answer to questions above with particular emphasis on the Section 106 obligations and the high value people place on living in a rural Norfolk village. 5b: At least equal to Zone A Rural villages are highly desirable places to live – if you have the money – and most residential development is ‘minor infill’; mostly done by the person that already owns the land and as such the costs provided by the consultants have no bearing on the most likely type of development; i.e. the land cost will be at agricultural value or ‘part of garden’ value and there will be no 20% interest charge on the development costs. The land owner will make a huge planning gain which at most attracts 18% capital gains tax. Such developments also escape all the section 106 obligations. The evidence base should be updated to take into account these facts and if that is brought into the equation it may well be that the evidence points to a higher charge in Zone B than in Zone A.	Broadland South Norfolk	It is recognised that very small sites could have the advantages outlined, however, these will also apply to small scale sites in Zone A. Very small sites will be “windfall” development as it can be expected that the vast majority of allocated sites in both Zones will be for 10 or more dwellings and therefore required to provide affordable housing and subject to other site related costs.	No change proposed
CIL069	Kate de Vries, on behalf of	5a Yes	All	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	the Broadland Community Partnership	No Comment – the BCP is not a body with the expert knowledge to question this recommendation			
CIL070	Cringleford Parish Council	5a Yes	All	Noted	No change
CIL071	Long Stratton Parish Council	5a Yes	South Norfolk	Noted	No change
CIL072	The Planning Bureau Ltd on behalf of McCarthy & Stone	5a No 5b No comment	All	Noted	No change
CIL074	Taverham Parish Council	5a Yes 5b No comment	Broadland	Noted	No change
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	5a No 5b £50/m2 The rate reflects the issues that lead to creation of the Norwich Policy Area Zone A = NPA + Greater benefits to those who reside in Zone A compared with those whom reside in Zone B.	Broadland South Norfolk	Comments noted. The CIL rate is based on viability evidence and needs to strikes the right balance between funding infrastructure and not being a disincentive to development. The rationale for 2 zones is supported by evidence as is the proposed rate for zone B.	No change

Question 6:	6a: It is intended that the rate of charge for domestic garages (excluding shared-user garages) in Zones A and B will be within a range of £25 to £35 per m2. What do you think the rate should be?
	6b: What is your justification for this rate?

Total number of responses:

4a: 24

4b: 25

Summary of Issues Raised:

- Some support for the proposed rates
- Concerns that CIL should not prejudice the provision of garages and exacerbate parking problems
- The charge is not supported by viability evidence which indicates that garages do not add to viability.
- Some suggestions that the same rate should apply for residential and garages

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	6a No As per 4a 6b	Broadland	Noted	Re-assess charge for residential garages
CIL004	Country Land and Business Association	6a: Please see comments below 6b: We are concerned that this category covers all domestic garages with the sole exception of shared-user garages. There are a number of situations where new rural dwellings are required to accommodate those employed in agriculture, horticulture and forestry. Such properties are not sold for development gain and are usually restricted by some form of occupancy condition. These properties are likely to include a domestic garage. In such cases, a charge of £25/m ² to £35/m ² would simply be an additional cost of construction. As these properties are crucial to the operation of rural businesses and sustainable rural communities, we ask that they be considered separately, based on a suitable viability assessment.	All	Noted	Re-assess charge for residential garages
CIL007	Stratton Strawless Parish Council	6a: Nil 6b: THE BUILDING OF A GARAGE DOES NOT ADD ANY BURDEN TO INFRASTRUCTURE, IN FACT THE OPPOSITE IS LIKELY TO BE THE EFFECT IE: REMOVING VEHICLES OFF HIGHWAYS WHEN NOT IN USE.	Broadland	Noted	Re-assess charge for residential garages
CIL009	Stockton Parish Council	6a: As above 6b: Not many garages built in comparison to new dwellings and retails developments.		Noted	Re-assess charge for residential garages
CIL014	Val Shepard on behalf of Temlemere Residents Association	6a: Less 6b A token payment should be charged but people should not be put off building garages if they can on their land. Parking is dreadful in Norwich in particular.	All	Noted	Re-assess charge for residential garages
CIL019	IE Homes & Property	6b: See comment as above. It needs to be re assessed.	All	Noted	Re-assess charge for residential

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
					garages
CIL020	Marlingford & Colton Parish Council	6a: No comment	South Norfolk	Noted	No change
CIL027	Horsford Parish Council	6a: As above 6b: To ensure that developments contribute to amenity and infrastructure improvements necessary to absorb the development.	Broadland	Noted	Re-assess charge for residential garages
CIL029	Orbit Homes	6b: Although CIL is required to be charged on garages, This needs to be balanced against ensuring adequate parking and storage provisions are provided within each new residential dwelling via the planning process.	All	Noted	Re-assess charge for residential garages
CIL031	Norton Subcourse Parish Council	It should be a flat rate. We hope that this does not have the effect of reducing the number of garages built with new homes	South Norfolk	Noted	Re-assess charge for residential garages
CIL032	Salhouse Parish Council	6a: £30 6b: This rate reflects the alternative uses to which a garage can be put.	All	Noted	Re-assess charge for residential garages
CIL033	Michael Sida	6a: No change	All	Noted	
CIL034	Newton Flotman Parish Council	6a: £30 6b: Around £400 (total) does not seem excessive (if our sums are right).	All	Noted	Re-assess charge for residential garages
CIL035	Capita Symonds on behalf of Breckland DC	6a: £0 6b: It is not clear from the submitted evidence why a separate rate for domestic garages is strictly necessary? Although it is recognised that garages form part of the definition of buildings 'that people normally go into' as guidance requires, the necessary floorspace should be 'smoothed' into the assessment of residential value as these will be costed as part of a residential build scheme (particularly where the dwelling type includes an integral garage). It is entirely likely that many new build schemes will therefore include integral/ adjoining garages which will then be converted to other domestic rooms with no need for Planning Permission (where these are not forward of the principal elevation of the dwelling). Therefore, to avoid such a scenario, GNDP authorities would need to serve Article 4 Directions to remove Permitted Development Rights to stop this potential loophole occurring. Therefore, the approach adopted by the GNDP seems unnecessarily complex. Furthermore, there does not appear to be any supporting viability evidence to underpin the proposed rate for domestic garages within the GVA assessment. Therefore, if this is the case a separate rate has not been justified by appropriate evidence.	All	Noted	Re-assess charge for residential garages
CIL036	Hale and Heckingham Parish Council	6b: We agree that it should be a flat rate across zones A and B. We hope this does not have the effect of reducing the number of garages built with new homes. Is it anticipated that all new properties will have integral garages?	All	Noted. It is anticipated that garages will be developed in the range of formats broadly as current practice	Re-assess charge for residential garages

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL038	Hugh Ivins	6a: £10 6b: Domestic garages have no quantifiable residential use other than for storage of a vehicle or household goods. This is particularly the case for detached garages which are 'ancillary' buildings	Broadland	Noted	Re-assess charge for residential garages
CIL040	Ptarmigan Land Ltd	6a: There should not be a charge for garages in either Zone A or Zone B. 6b: Having an additional CIL charge for this will inevitably mean developments will be less likely to include garages in their design, as the additional house value derived from including a garage, is not equivalent to the value derived by additional living space and not sufficient to justify the additional CIL charge that would be payable.	All	Noted	Re-assess charge for residential garages
CIL047	Beyond Green Ltd	6a: £135 6b: We do not understand the logic behind a substantially reduced rate for arages. The critical quality a private garage has which a shared garage or eternal parking space does not is that it can and often will be used for things other than garaging; i.e. as an extra room. They may add less value to homes than a comparable area of habitable space but they also cost less to build. A very substantially reduced rate of CIL for garages represents, in effect, a distortive bias in favour of developers who regard a private garage as a fndament of their product at the expense of those who do not. Moreover, the CIL savings of a double garage relative to the CIL cost of the same space provided as habitable space could be as much as £5,000, potentially opening up a route of CIL 'avoidance' as unscrupulous developers provide ready-to-convert garage spaces to arbitrage between the two rates. Private garages should attract the full CIL rate.	All	Noted	Re-assess charge for residential garages
CIL052	Town Planning Intelligence on behalf of Zurich Assurance Limited	6b: An average single garage has an area of 18 square metres, and a double 36 square metres. This works out at a total CIL payment of £450 to £630 per car space. A possible consequence is the substitution of car ports for garages, unless they are included in the definition of "garage"; or even hardstandings, especially at the low end of the market. Otherwise, in the absence of a detailed consideration of our own landholdings on which to base a judgement, we are not suggesting an alternative rate at this stage.	All	Noted	Re-assess charge for residential garages
CIL053	Diss Town Council	6b: It is difficult to comment on whether the rate is appropriate but there is concern that a CIL levy on domestic garages could have an impact on the number of garages that are built, especially as part of larger developments.	All	Noted	Re-assess charge for residential garages
CIL054	Aylsham Town Council	6a: No comment	Broadland	Noted	Re-assess charge for residential garages
CIL055	Stephen Heard, on behalf of Stop Norwich Urbanisation	Comments made under Q15 that raise issues relating to this question The JCS is not sound. Housing viability continues to deteriorate and therefore assumptions for growth and rising house prices are flawed. This paper changes the basis on which the Councils justified the viability to the Planning Inspectors. The levels of charging cannot therefore be justified. There is inadequate accountability for the disbursement of these sums of money. The paltry level of 5% to local councils is a travesty of any ideas of Localism. The introduction of a Garage Tax is unjustified. The proposals for future changes to the CIL regulations in the future to fund affordable housing is disgraceful.	All	The inspectors considered the viability of affordable housing at the JCS Public Examination. The GVA report compares the assumptions used in both studies. Meaningful is likely to be defined by Government Regulations following consultation. Garages are part of development as covered by CIL Regulation. The possibility of using CIL to fund affordable	No Change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		That is not infrastructure.		housing is the subject of Government consultation.	
CIL055	Stephen Heard on behalf of SNUB	6a: Zero	All	Noted	Re-assess charge for residential garages
CIL057	Jon Clemo on behalf of Norfolk Rural Community Council	6b: No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted	
CIL058	Alan Richard Williams on behalf of SNUB	6a: Zero 6b: There is no justification for assessing garages separately from the rest of a residential unit except as a means to raise more money. Once this principle is accepted what will stop the Councils raising money on the energy efficiency, the size of the garden or anything else that takes their fancy. It will also encourage on street parking, or is that just seen as another way to raise money. This is a deplorable suggestion..	All	In accordance with the CIL regulations it will be necessary to include garage floorspace in any charge where it is provided as part of a residential development (or if it is a separate development of 100m2 or more). CIL is only chargeable on buildings and is not levied on gardens or energy efficiency.	Re-assess charge for residential garages
CIL062	Ciara Arundel & Melys Pritchett (Savills) In conjunction with Norfolk Homes and Endurance Estates on behalf of Easton Land Owners Consortium	6a: £0 6b: The study carried out for GNDP by Mott McDonald dated 14 September 2011 concludes that having carried out primary and secondary research, it would appear that under most scenarios the cost associated with constructing a detached garage actually surpasses the increased value which having a garage adds to the sale price.	All	Noted	Re-assess charge for residential garages
CIL063	Andrew Leeder on behalf of the Leeder Family	6b: No comment at this stage		Noted	Re-assess charge for residential garages
CIL063	Mr A B Walker	6a: Agree GNDP response Noted	All	Noted	Re-assess charge for residential garages
CIL067	Redenhall with Harleston Town Council	6b: Please see covering letter	South Norfolk	Noted	Re-assess charge for residential garages
CIL068	Bunwell Parish Council	6a: £35 per sq metre 6b: It seems to strike the right balance of 'none at all' which could lead to abuse of the system and a high one which would put off the seeking of planning permission for garages as they can always be applied for later and would attract zero CIL. For clarity we would like to see 'car ports' added to this	All	Noted	Re-assess charge for residential garages
CIL069	Kate de Vries, on behalf of the Broadland Community Partnership	6a: No Comment – the BCP is not a body with the expert knowledge to question this recommendation	Broadland	Noted	Re-assess charge for residential garages
CIL070	Cringleford Parish Council	6a: £35	All	Noted	Re-assess charge for residential

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		6b: The rising cost of providing the infrastructure			garages
CIL071	Long Stratton Parish Council	6b: The rising cost of providing the infrastructure	All	Noted	Re-assess charge for residential garages
CIL072	The Planning Bureau Ltd on behalf of McCarthy & Stone	6a: No Comment	All	Noted	Re-assess charge for residential garages
CIL074	Taverham Parish Council	6a: 0 6b: People should be encouraged to use garages. A zero rate would encourage them to be built at a size that would accommodate modern cars.	Broadland	Noted	Re-assess charge for residential garages
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	6a: £5/m2 6b: It reflects the value that a garage adds to a property based on £75m2 CIL for the residential element of the property.	All	Noted	Re-assess charge for residential garages

Question 7:	<p>Large convenience goods based supermarkets and supermarkets</p> <p>7a: It is intended that the rate of charge for large convenience goods based supermarkets and superstores of 2,000m2 gross or more will be £135 per m2. Do you agree with this approach?</p> <p>7b: What should the charge be? What is your justification for this rate?</p>
<p>Total number of response: 31</p> <p>Yes: 17 No: 9 Comment: 5</p> <p>Summary of Issues Raised:</p> <ul style="list-style-type: none"> The majority of respondents agree with the rate proposed or suggest it should be higher. A few (mainly parish councils) did not feel qualified to comment. The general consensus from non supermarket operators/ developers (including residential developers) is that the rate proposed is too low. Supermarket operators/ developers consider the rate is too high. There is no new evidence provided to justify an increase or decrease in rates although notional information about land values and the cost of s.106 requirements are mentioned. There is some confusion about the method of calculating the rate of CIL- representations suggest it should be based on the impact of the development or the cost of infrastructure rather than viability of particular types of development, as required by the regulations. 	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	7a: No As these conglomerate's make obscene profits and cause local business to close and job losses. They are not conducive to sustainability 7b: As much as possible i.e. 19 Tesco stores in Norwich is by any standards a monopoly whats being done about it although they have reported lower sales their profits are up who's being ripped off.	Broadland	Noted - but without any evidence to substantiate an increase in the rate	No change
CIL007	Stratton Strawless PC	7a: No 7b: THIS RATE COULD BE JUSTIFIABLY INCREASED OR BETTER STILL THE ACTUAL COST OF CHANGES TO INFRASTRUCTURE BE CHARGED.	Broadland	Noted - The rate cannot be linked to the cost of infrastructure works associated with the development. Any site specific works would be picked up through s.106	No change
CIL009	Stockton Parish Council	7a: Yes Although seems generous compared to other proposed rates	South Norfolk	Noted	No change
CIL014	Val Shepherd on behalf of Templemere Residents Association	7a: Yes Seems irrelevant if very few are likely to be built locally.	All	Noted - There will only likely to be a few cases where this will be applied	No change
CIL020	Postwick with Witton Parish Council	7a: Yes	Broadland	Noted	No change
CIL022	Peacock & Smith Ltd	7a: No OBJECTION TO THE PROPOSED CIL CHARGES FOR FOR LARGE CONVEINCE GOODS BASED SUPERMARKETS OF 2,000 SQ.M GROSS OR MORE On behalf of our clients, Wm Morrison Supermarkets plc, we OBJECT to the proposed CIL rate charge for large convenience goods based supermarkets and superstores of 2,000 sq.m gross or more identified in the Table at Section 4 of the Preliminary Draft Charging Schedule. In particular, we OBJECT to the following matters:	All	No further viability evidence has been provided. The GVA evidence suggests that the viability of larger stores would not be adversely affected by the level of CIL proposed. CIL can only be based on viability and not other policy grounds. A direct comparison with other districts' charging schedules is not possible due to the split between CIL and s.106 proposed in the regulation 123 list. The proposed	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<ul style="list-style-type: none"> The significantly lower CIL rate of £25 per sq.m for retail developments < 2,000 sq.m gross will unreasonably favour smaller scale retail developments over larger and appears to support a decision by the charging authority (Council) to support smaller units which goes beyond viability considerations alone and conflicts with national guidance. It is therefore considered that separate rates for new retail development of different sizes is not reasonable or properly justified, and has the effect of conferring selective advantage within the retail development sector. It is suggested that the rates are amended to provide one, reduced flat rate for new retail development providing over 100 sq.m gross internal floor area. The proposed CIL rate of £135 per sq.m for new retail developments of 2,000 sq.m gross or more is very high, and for a large foodstore (of around 7,400 sq.m GIA) will result in a CIL charge of £0.999m which is excessive. A levy of this level is likely to render future large-scale retail developments unviable, particularly when taking in to account other costs for local infrastructure works and other contributions required as part of typical s106 Agreements (such as highway works which can typically be very expensive to ensure large scale retail developments function well). This CIL level is also significantly higher than a figure recently approved in a similar document for Newark and Sherwood District Council, which adopted a figure of £125 per sq.m in Newark Growth Point and £100 per sq.m elsewhere in the District. <p>Suggested Change to the CIL rate for Retail Development</p> <p>It is suggested that the Council should adopt one CIL rate for all retail development providing more than 100 sq.m additional (new) gross internal floorspace, and that the charging level should be amended and full justification for the new figure should be given to ensure that all relevant factors have been taken in to consideration.</p> <p>We reserve the right to comment further at later stages of preparation of this document.</p>		GNDP approach is that the remaining s.106 contributions will be limited to site mitigation.	
CIL026	Maringford and Colton Parish Council	7a: No comment	South Norfolk	Noted	No change
CIL027	Horsford Parish Council	7a: Yes	Broadland	Noted	No change
CIL031	Norton Subcourse Parish Council	7a: Cannot comment on actual amount 7b: We cannot comment on the actual amount, We believe it should be a much higher rate than residential, at least four times.	South Norfolk	Noted- the rate proposed is based on viability evince. Without any new evidence this rate could not be increased so significantly.	No change
CIL032	Salhouse Parish Council	7a: Yes	All	Noted	No change
CIL033	Michael Sida	7a: Yes	All	Noted	No change
CIL034	Newton Flotman Parish Council	7a: Yes	All	Noted	No change
CIL036	Hale and Heckingham Parish Council	7a: Yes We cannot comment on the actual amount	All	Noted	No change
CIL040	Ptarmigan Land Ltd	7a: No 7b: £300/m2 + It is difficult to say how much exactly supermarkets should pay in CIL as a proper viability assessment for this has yet to be undertaken. It is worth bearing in mind however that development land values for supermarkets are in the region of £1.5m - £2m per acre compared to GVA's suggested residential values of £0.21m - £0.25m per acre for Zone A residential. This does raise the question of why residential development is expected to pay a higher CIL when supermarkets clearly have much more capacity to accommodate this cost?		The rate of CIL proposed for larger supermarkets is based on viability evidence which takes account of the likely development land values.	No change
CIL041	Garth Hanlon (Savills) Honingham Thorpe Farms	7a: No In objecting to this rate, we would confirm our view that the retail sector is a vital component part of the rural economy and thus a high CIL rate figure in the manner suggested is totally inappropriate. Current economic circumstances are such that any increased burden on an already suffering sector provides little assistance to	All	The rate proposed is based on viability evidence. No new evidence has been provided here. CIL cannot be set at a particular level just to meet policy objectives.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	LLP	<p>developers who are aiming to inject growth into the market. GNDP must listen to those commentators who remain concerned about the high CIL rates that are being applied. A simple assumption that convenience retail can make a significant CIL contribution is ill-advised at a time when authorities are looking to deliver the clear growth agenda within the Adopted Core Strategy.</p> <p>7b: £50 per square meter The justification is a simple matter of reducing the costs to a developer who is seeking to deliver an agenda of delivery set out within the Core Strategy.</p>			
CIL047	Beyond Green Ltd	7a: Yes	All	Noted	No change
CIL052	Cecil Elliston Ball (Town Planning Intelligence) on behalf of Zurich Assurance Limited	7a: We have no comments on this proposal.	All	Noted	No change
CIL053	Diss Town Council	<p>7a: No This type of development is almost always undertaken by large organisations (such as Tesco and the like), which have huge resources, make large profits and are usually built in towns around the County in complete opposition to local people and resulting in local traders going out of business. These types of stores should attract a much higher rate of CIL levy to offset the damage these large stores do to the local economy.</p> <p>7b: As Diss Town Council is not in a position to provide any 'evidence' regarding CIL levy it is very difficult to comment on this. But from a 'layman's' perspective, perhaps double?</p>	All	Noted. No change can be made without further viability evidence.	No change
CIL054	Aylsham Town Council	7a: Yes	Broadland	Noted	No change
CIL055	Stephen Heard on behalf of SNUB	7a: No The existing rules around Section 106 should be applied.		Noted - Any site specific costs would still be picked up as part of any s.106 agreement related to the development.	No change
CIL056	Thomas Egger LLP, on behalf of Asda Stores Limited	<p>Comments made under Q15 that raise issues relating to this question</p> <p>We act for Asda Stores Limited, who have asked us to make representations on their behalf in respect of the draft Charging Schedules prepared by the Greater Norwich Development Partnership on behalf of Norwich City Council, Broadland District Council and South Norfolk Council.</p> <p>As the Charging Schedules proposed are the same for all three councils (albeit with some variations between areas within the combined districts of the three councils) we will confine representations to a single set of comments on the collective effect of the three Charging Schedules. This is consistent with the approach of the councils, which has been to achieve a universal charging schedule amongst the three districts.</p> <p>We wish to object fundamentally to the approach taken to assessing the Charging Schedules, and to the disproportionate loading of the Community Infrastructure Levy upon two limited classes of development: retail uses, especially large convenience goods based supermarkets and superstores of 2000 square metres gross or more, and additionally (although of less direct concern to our client) residential development.</p> <p>The stated purpose of the Community Infrastructure Levy is to raise revenue for infrastructure necessary to serve development. The rationalisation for the imposition of the Community Infrastructure Levy was that insufficient monies were being raised through the planning process to fund the infrastructure necessary to provide for the needs of development authorised by planning permissions. While revenue has historically been raised by Section 106 Agreements (and Section 52 Agreements before those) the revenue collected, it was argued, has been raised disproportionately from a limited number and class of developments, and the majority of (minor) developments that escaped the requirements to enter into a Section 106 Agreement were either effectively subsidised by larger developments, or were allowed to proceed, and individually and</p>		<p>No further viability evidence has been provided. The GVA evidence suggests that the viability of larger stores would not be adversely affected by the level of CIL proposed. CIL can only be based on viability and not other policy grounds. The proposed GNDP approach is that the remaining s.106 contributions will be limited to site mitigation.</p> <p>Evidence provided by other respondents on residential rates will be taken into account when considering appropriate residential rates of CIL.</p>	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>cumulatively contributed to infrastructure requirements, without being required to pay for them. The Community Infrastructure Levy was intended to remedy that imbalance.</p> <p>Against that background, we do not think it an unreasonable approach to seek a Community Infrastructure Schedule calculated on a district-wide (or, as here, three districts-wide), assessment of infrastructure needs, with the estimated total cost being divided between the total estimated or planned development anticipated for a district (or three districts). That would at least have been a fair and potentially proportionate approach to the issue of raising the Community Infrastructure Levy and fixing the Charging Schedules. It is noteworthy that this is the approach that has already been adopted by some of the authorities who have already had their Charging Schedules approved.</p> <p>Instead, the Charging Schedules proposed for the three districts exhibit a fundamental disconnect between the Community Infrastructure Levy charges proposed: many of these prepared by your consultants, GVA. However the principle work undertaken by GVA appears to be simply to assess each segment of the development as a potential 'cash cow' and source of revenue, without carrying out any, or any meaningful, exercise to assess the infrastructure likely to arise from any particular class of development.</p> <p>In this connection, it is worth taking a moment to consider the contribution made by the retail sector as a whole to the economy of the UK. The retail sector is one of the most dynamic and innovative sectors within the UK economy. It is also one of the largest employers and largest creator of new jobs at the present time. Asda Stores Limited have a proven track record of investing in and on the edge of town centres and other existing centres, and of creating jobs within these. Their stores regularly rejuvenate and regenerate existing centres, and of creating jobs within these. Their stores regularly draw new shoppers to them, which benefits the existing retailers, and those who open stores in Asda-anchored centres in their wake. Across the UK, while some superstores individually necessitate the provision of specific local infrastructure, the proliferation of large modern supermarkets can be argued to have reduced infrastructure requirements by lessening the travel distances necessary for people to undertake their bulk food shopping. Put shortly, it is frequently the case that journey times fall as new supermarkets are opened.</p> <p>Nowhere in the GVA supporting papers is there any acknowledgement of this phenomenon, nor indeed any meaningful assessment of the role of large supermarkets within the national economy, beyond a very crude assessment that they have the capacity to pay potentially very large sums of Community Infrastructure Levy.</p> <p>In this connection, we are extremely concerned by the suggestion put forward by GVA as part of the background papers and justification to the three local authorities preparing these Charging Schedules that a generic superstore developed by an operator would be capable of paying CIL upto £1,500.00 per square metre. This would be a total of nearly £9,750,000.00 for the 6,500 square metre typical superstore which they consider. This level of contribution is wholly unrealistic and would threaten the ability of operators to make the investment the economy needs.</p> <p>Even at the Community Infrastructure Levy figure proposed in the Charging Schedules of £135.00 per square metre, the proposed Charging Schedules would add £877,500.00 to the cost of GVA's generic supermarket development. Nowhere in the GVA paper is there any suggestion that this is necessarily the appropriate figure in terms of the related costs that a supermarket development is expected to carry. They have concerned themselves only with their (superficial – as they themselves acknowledge) calculations of assumed ability to pay.</p> <p>Given that there is a risk that, at least for an interim period, local authorities will still seek site-specific commitments also under the Section 106 regime this represents an un-reasonable double whammy of loading costs onto a very limited category of development.</p> <p>Although these representations are not made on behalf of any house builder in particular, or the housing industry in general, we note that a similar approach had been adopted to commercial house building. While our clients are mainly concerned with the impact on retail developments, this is still a matter of legitimate concern to our clients, who are involved in many mixed use town and district centre schemes. The viability of many of these will be prejudiced. Again, very high rates of Community Infrastructure Levy are proposed, and these, if adopted will have the effect of reducing the supply of housing within the three districts involved. All other things being equal, if you increase the cost of providing a product, either the supply of it will fall, or the price will rise, reducing demand.</p>			

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>Adding up to £16,000 to the cost of a 100 square metre house at a time when the Government is seeking to improve the affordability and supply of housing seems perverse to say the least.</p> <p>Similarly, providing a major disincentive and additional cost to investment major supermarkets at a time when government policy (as to which see the ministerial statement 'Planning for Growth' and the draft National Planning Policy Framework issued on 25 July 2011) is to achieve greater investment in the economy and greater job creation is completely inappropriate.</p> <p>The charges proposed to be levied on large supermarkets (£135 per square metre) and on house building (£135 - £160 per square metre) appear even more disproportionate when one looks at the remainder of the Charging Schedule where all other forms of development save smaller retail units (£25.00 per square metre) are to be charged at a blanket rate of a relatively nominal £5.00 per square metre.</p> <p>If these Charging Schedules are adopted, there will inevitably be two consequences across the three districts adopting them: firstly, all other forms of development will receive a massive subsidy at the expense of commercial house building and the construction of large supermarkets; and secondly, there will be a corresponding disincentive (and market distortion accordingly) to investment in those two sectors of the economy.</p> <p>It is trite economics that ideally taxes should distort the market as little as possible, and allow consumer and market preferences to be expressed in the most natural way as possible to optimum market solutions. This is every bit as true as in the market for land and the use of land as in all other aspects of the economy. The proposed Charging Schedules being promoted by the Greater Norwich Development Partnership fly in the face of the fundamental principle of taxation. If these Charging Schedules are implemented, they will distort the local market across the three districts; and they will provide a huge disincentive to house building at a time when the Government is trying to encourage this; and to investment in large retailing, a significant job creator, at a time when the Government is trying to encourage the creation of additional employment across the economy.</p> <p>Additionally, it should be noted that within the three district economy, over the planned period, there is likely to be a very limited number of large format retail stores built. Consequently, reducing the levy proposed per square metre on this floorspace would not result in a proportionate increase in the levy required on other forms of commercial or other development. However, applying this levy would run the risk of diminishing substantially the number of such stores built, with a consequential loss of employment opportunities, regeneration, and investment in town and district centres.</p> <p>A much fairer solution, accepting for the purpose of this argument that the Community Infrastructure Levy is necessary for funding district-wide infrastructure, would be to divide the council's estimate of total infrastructure costs over the charging period (and in this connection, it is important to remember the Government's guidance as recorded in the National Planning Policy Framework is that deliverable infrastructure should be included) by the total expected development floorspace and apply a flat rate levy across the district and across all forms of development. That will have the least possible adverse effect upon the market for land and for development, and yet the greatest possible opportunity for the economy to prosper and thrive, and for jobs to be created.</p> <p>For all these reasons, we would ask that the Greater Norwich Development Partnership and its constituent local authorities undertake a fundamental rethink of their position, and substantially alter their charging schedules in so far as they relate to retail development in general, and large format retailing in particular.</p>			
CIL057	Jon Clemo on behalf of Norfolk Rural Community Council	<p>7a: No Comment – Norfolk RCC does not have specialist expertise in this area</p>	All	Noted	No change
CIL058	Alan Richard Williams on behalf of SNUB	<p>7a: No</p> <p>The infrastructure requirements created by the building of these stores extends widely beyond their immediate confines. They also make poor neighbours with extended hours and car park lighting. It would not be unreasonable to make a charge which reflects the damage they do to those who live in their proximity. It would enable the infrastructure to be created around them which would alleviate that damage</p>	All	Noted - CIL cannot be based on the impact of a particular development on its immediate vicinity, unlike s.106. It must be based on viability.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		To invite an alternative suggestion is disingenuous, you are all well versed in producing environmental assessments and establishing the value of such nebulous concepts. It would probably be near double that value because present construction does not adequately meet the environmental needs of their environs.			
CIL061	Indigo Planning on behalf of Sainsbury's Supermarkets	<p>Comments made under Q15 that raise issues relating to this question</p> <p>We write on behalf of our client, Sainsbury's Supermarkets Ltd, in respect of the draft CIL Charging Schedules for Broadland, Norwich and South Norfolk.</p> <p>Sainsbury's currently operates three stores in the Joint Core Strategy Area at:</p> <ul style="list-style-type: none"> • Pound Lane, Norwich (Broadland District Council); • Longwater Retail Park, Costessey (South Norfolk District Council); and • Queens Road, Norwich (Norwich City Council). <p>Sainsbury's are also interested in pursuing future opportunities to enhance their retail offer in the Joint Core Strategy area.</p> <p>The implementation of CIL in the Joint Core Strategy Area and its impact on retail proposals is therefore of great interest to Sainsbury's and they are keen to ensure that the CIL levy is implemented appropriately.</p> <p>Having reviewed each of the draft Charging Schedules, we are of the firm view that the proposed levy of £135 per m² on convenience stores over 2,000m² is both unreasonable and unjustifiable. It will simply be too onerous to developers and operators to pay this levy in respect of foodstore development in addition to having to pay considerable Section 106 contributions. The levy means that these types of development will need to contribute at least £270,000, but more than likely, a minimum fee of £500,000 will be required for a standard new foodstore.</p> <p>From a review of the evidence base, it is clear that the figure of £135 per m² has not been robustly assessed in any way, particularly in terms of the potential impacts on the economic viability of development. This is a requirement of Section 14 of the CIL Regulations and, therefore, the levy as proposed is not appropriate or reasonable. It is completely unreasonable to base the figure on the general assumption that retail development can afford to make a bigger contribution than other types of development in terms of viability.</p> <p>Furthermore, in light of the Government's clear promotion of sustainable economic development, the imposition of this levy will conflict with key national policy aims. One of the key messages from 'Planning for Growth' is that LPA's should "ensure that they do not impose unnecessary burdens on development".</p> <p>The imposition of the proposed levy rate will be a clear burden on retail development and it will be harmful to investment and job creation. PPS4 identifies retail as economic development and development that generates employment. In the current economic climate, retail development is an important contributor to economic growth and obstacles such as the proposed levy should not be imposed. It will be in clear conflict with current national policy and should not be carried forward, as proposed.</p> <p>If a levy must be brought forward, we consider that a cap needs to be set for the total amount of money that can be contributed by developments through CIL. This cap should be based on a robust assessment of viability, taking into account that developers will still also be contributing significant funds towards Section 106 Agreements. It is unreasonable that the proposed CIL Levy effectively acts as restriction on the size of development that is allowed by being such a fundamental factor in the overall viability of the development. This is too restrictive and unjustified, especially in the current economic climate.</p> <p>Finally, we would highlight the need for the next draft version of the document to include a list of specific infrastructure requirements which CIL will contribute towards. This list is fundamental to understanding the need for CIL contributions and the impact of any individual scheme on these infrastructure requirements. The document cannot come forward without this list.</p> <p>We trust that the above comments will be taken into consideration in the preparation of the next draft of the Charging Schedules. Sainsbury's are keen to invest further within the Joint Core Strategy area, but do not wish to see potential development opportunities adversely impacted upon by the imposition of an unreasonable CIL Levy.</p> <p>Please contact my colleague Helen McManus or myself if you wish to discuss further and please keep us</p>		Noted- relates to Q7	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		informed of the LDF process going forward.			
CIL062	Ciara Arundel & Melys Pritchett (Savills) In conjunction with Norfolk Homes and Endurance Estates on behalf of Easton Land Owners Consortium	7a: No The retail sector is a complex one and there is a significant difference between the world of superstores and supermarkets. We understand that over the period of the Joint Core Strategy there are unlikely to be many superstores being delivered in the GNDP area but, where there are, the operators have the capability to pay significantly more in CIL/Tariff than those trading from smaller stores. Land values for stores in neighbour centres tend to be in the region of £500,000 per acre whereas the operators will base their land bid on demographics for the superstores and have been known to pay well over £1,000,000 per acre. In view of this we consider that there should be a higher tariff for superstores. 7b: £270 for superstores We have not carried out specific appraisals for this but have based it purely on a land value basis.	All	Noted. There is no new evidence provided to justify an increase in the rates.	No change
CIL063	Andrew Leeder on behalf of the Leeder Family	7a: No comment at this stage		Noted	No change
CIL066	Mr A B Walker (Resident)	7a: Yes	All	Noted	No change
CIL067	Redenhall with Harleston Town Council	7a: Yes Please see covering letter	South Norfolk	Noted	No change
CIL068	Bunwell Parish Council	7a: Yes	All	Noted	No change
CIL069	Kate de Vries, on behalf of the Broadland Community Partnership	7a: Yes No Comment – the BCP is not a body with the expert knowledge to question this recommendation	Broadland	Noted	No change
CIL070	Cringleford Parish Council	7a: Yes	All	Noted	No change
CIL071	Long Stratton Parish Council	7a: Yes	South Norfolk	Noted	No change
CIL072	The Planning Bureau Ltd on behalf of McCarthy & Stone	7a: No Comment	All	Noted	No change
CIL074	Taverham Parish Council	7a: Yes	Broadland	Noted	No change
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	7a: Yes / No However a further band rate of £60/m2 should be introduced for developments of 500 to 1999 m2 There is no free lunch. 7b: See comment above relating to inclusion of an additional band rate There is not such a thing as a free lunch	All	Noted. There is no new evidence to justify a new charging rate for an intermediate size of store	No change

Question 8:	8a: It is intended that the rate of charge for all other retail and assembly and leisure developments will be £25 per m2 (including shared user garages). Do you agree with this approach?
	8b: If you answered no to the above question, What should the charge be?

Total number of respondents: 33
Yes: 18 No: 12 No comment: 3

Summary of Issues Raised:

- A wide range of issues were received with rates suggested from nil to the same rate as residential development.
- Some respondents felt a varied rate should be applied to different uses for example, some respondents thought the rate should be nil in rural areas to encourage rural retail.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	8a: No. To be as low as possible 8b: Does assembly mean manufacturing and retail small shops (not supermarkets or offshoots of such businesses)	Broadland	No evidence submitted to support a lower charge. 'Assembly' refers to leisure and not manufacturing or retail.	No change
CIL004	Country Land & Business Associations Ltd	8a: No. We are concerned that this charge could have an adverse impact on the provision of rural shops and services, be it a village store or farm shop. Such businesses are usually relatively small enterprises generating marginal returns, but they do provide essential facilities for rural communities. Without such shops, residents from rural settlements are forced to travel to the nearest market town and usually by private car which puts more pressure on the local infrastructure. By encouraging the provision of rural retail, the impact on infrastructure could actually be reduced. The current level of charge proposed for "all other retail" is likely to make most new rural shops uneconomic. We therefore ask that rural shops be given separate consideration, based on a suitable viability assessment. 8b: £0 per m ² for rural shops and services		The CIL Regulations 2010 (amended) do not allow for CIL to be used to support policy. No viability evidence has been submitted to support a nil rate for rural shops and services.	No change
CIL007	Stratton Strawless PC	8a: Yes	Broadland	Support noted	No change
CIL009	Stockton Parish Council	8a: No. Seems disproportionate to private householders fees 8b: Same as private householders or greater. Can't see justification for this discount rate	South Norfolk	No evidence submitted to support a higher charge.	No change
CIL014	Val Shepherd on behalf of Templerere Residents Association	8a: No. This is much less than proposed for residential development. As our site is adjacent to 2 sites which could be developed residents would support any development over none because they are both eyesores detrimental to the area and have been for years. Therefore it would be wrong to favour non-residential development of this sort by charging far less. The local development framework can already be used to suggest favoured uses for a site; it should not be down to the CIL to direct developers one way or the other. 8b: More. Needs to be more if sufficient monies are not going to be collected from residential development, there seem very few signs of house building locally.	All	No evidence submitted to support a higher charge. The Local Development Framework will allocate particular uses for land and not the CIL. The CIL alone will not dictate the viability of a site for residential or any other use.	No change
CIL020	Postwick with Witton Parish Council	8a: Yes	Broadland	Support noted	No change
CIL022	Peacock & Smith Ltd	8a: No. Objection to the proposed cil charges for retail uses. On behalf of our clients, Wm Morrison Supermarkets plc, we object to the proposed CIL rate charge for retail uses identified in the Table at Section 4 of the Preliminary Draft Charging Schedule.	All	No evidence submitted to support changing the CIL rate or for adopting one CIL rate for all development.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>In particular, we OBJECT to the following matters:</p> <ul style="list-style-type: none"> The significantly lower CIL rate of £25 per sq.m for retail developments < 2,000 sq.m gross will unreasonably favour smaller scale retail developments over larger and appears to support a decision by the charging authority (Council) to support smaller units which goes beyond viability considerations alone and conflicts with national guidance. It is therefore considered that separate rates for new retail development of different sizes is not reasonable or properly justified, and has the effect of conferring selective advantage within the retail development sector. It is suggested that the rates are amended to provide one, reduced flat rate for new retail development providing over 100 sq.m gross internal floor area. The proposed CIL rate of £135 per sq.m for new retail developments of 2,000 sq.m gross or more is very high, and for a large foodstore (of around 7,400 sq.m GIA) will result in a CIL charge of £0.999m which is excessive. A levy of this level is likely to render future large-scale retail developments unviable, particularly when taking in to account other costs for local infrastructure works and other contributions required as part of typical s106 Agreements (such as highway works which can typically be very expensive to ensure large scale retail developments function well). This CIL level is also significantly higher than a figure recently approved in a similar document for Newark and Sherwood District Council, which adopted a figure of £125 per sq.m in Newark Growth Point and £100 per sq.m elsewhere in the District. <p>Suggested Change to the CIL rate for Retail Development It is suggested that the Council should adopt one CIL rate for all retail development providing more than 100 sq.m additional (new) gross internal floorspace, and that the charging level should be amended and full justification for the new figure should be given to ensure that all relevant factors have been taken in to consideration</p> <p>We reserve the right to comment further at later stages of preparation of this document.</p>			
CIL026	Marlingford & Colton Parish Council	South Norfolk		Noted	No change
CIL027	Horsford Parish Council	8a: Yes	Broadland	Support Noted	No change
CIL031	Norton Subcourse Parish Council	<p>8a: No Community leisure facilities should be exempt, otherwise the CIL is being used to pay for itself</p> <p>We think the rate for commercial retail and assembly and leisure developments should be the same as residential</p> <p>8b: See below</p> <p>Community leisure facilities should be exempt, otherwise the CIL is being used to pay for itself</p> <p>We think the rate for commercial retail and assembly and leisure developments should be the same as residential</p>	South Norfolk	Community leisure uses (D1) such as Community Halls will be exempt	No change
CIL032	Salhouse Parish Council	8a: Yes	All	Support noted	No change
CIL033	Michael Sida	8a: Yes	All	Support noted	No change
CIL034	Newton Flotman Parish Council	8a: Yes	All	Support noted	No change
CIL036	Hales and Heckingham Parish Council	<p>8a: No Community leisure facilities should be exempt, otherwise the CIL is being used to pay for itself</p> <p>We think the rate for commercial retail and assembly and leisure developments should be the same as residential</p> <p>8b: See below</p> <p>Community leisure facilities should be exempt, otherwise the CIL is being used to pay for itself</p> <p>We think the rate for commercial retail and assembly and leisure developments should be the same as</p>	All	Community leisure uses (D1) such as Community Halls will be exempt	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		residential			
CIL040	Ptarmigan Land Ltd	8a: Yes		Support noted	No change
CIL041	Garth Hanlon (Savills) on behalf of Honingham Thorpe Farms LLP	8a: No. Having regard to Question 7a, this matter relates to a sliding scale of CIL on the basis that the smaller the development the less likely it is able to bear a CIL rate. Whilst we support such logic we remain concerned that applying the £25 per square meter rate remains inappropriate in a context when we know delivery of growth is under great strain. Use Classes A1 – A5 and D2 are those sectors which are key to any new development scheme and especially those large urban extensions referred to in the plan. Imposing a CIL rate on top of the conventional S106 mechanism is only anticipated to increase costs – we cannot support an approach which places extra burden on development sectors and thereby threatens delivery. 8b: Nil rate On the basis that this sector is a vital component part of the economy it is imperative that fundamental obstacles are not placed in the way of delivering a strategy which is set out in the Core Strategy. A central government agenda encouraging the planning system to deliver growth is vitally important and even more in the Norwich area. Such sectors are the backbone of local investment and consequently a nil rate should apply.	Broadland South Norfolk	No evidence submitted to support nil rate	No change
CIL047	Beyond Green Ltd	8a: Yes	All	Support noted	No change
CIL052	Cecil Elliston Ball (Town Planning Intelligence) on behalf of Zurich Assurance Limited	8a: Yes	All	Support noted	No change
CIL053	Diss Town Council	8a: Yes. We would respectfully suggest that where a 'leisure' development, such as a new community or leisure centre commissioned by local authorities or community enterprises which will be run as a not for profit venture should be exempt from CIL. S106 could still be used to provide the necessary on-site infrastructure needed to support the development.	All	Community leisure use classes (use class D1) such as community halls will be exempt	No change
CIL054	Aylsham Town Council	8a: Yes	Broadland	Support noted	No change
CIL055	Stephen Heard on behalf of SNUB	8a: No		Noted	No change
CIL057	Jon Clemo on behalf of Norfolk Rural Community Council	8a: No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted	No change
CIL058	Alan Richard Williams on behalf of SNUB	8a: No. It seems curious that these three items are linked in this way. The inclusion of small retail is understandable but this assumes every supermarket or store of less than 2000m2. Many of these emporia demonstrate characteristics similar to superstores and this level of charge seems very low. There must also be a case for exempting some community assembly developments. 8b: See Question 7	All	No evidence submitted to justify and alternative rate. Community leisure use classes (use class D1) such as community halls will be exempt	No change
CIL062	Ciara Arundel & Melys Pritchett (Savills) In conjunction with Norfolk Homes and Endurance Estates on behalf of	8a: No. This covers a wide variety of actual uses and the market for them varies. It is noted that where this exists in other areas, the lowest necessary charge is levied to encourage employment development. 8b: £0 There has been no speculative development of this nature in the GNDP area for many years, even at the height of the market.	All	No evidence submitted to justify an alternative rate	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Easton Land Owners Consortium				
CIL063	Andrew Leeder on behalf of the Leeder Family	8a: No comment at this stage		Noted	No change
CIL063	Mr A B Walker (Resident)	8a: Yes	All	Support noted	No change
CIL067	Redenhall with Harleston Town Council	8a: Yes	South Norfolk	Support noted	No change
CIL068	Bunwell Parish Council	8a: No. Shared use garages should be charged at exactly the same rate as other garages. Charges for leisure developments needs clarification – for example Bingo halls should be chargeable but gyms and spas need a lower rate 8b: Variable	All	Charges will apply to all developments classified as use class D2.	No change
CIL069	Kate de Vries, on behalf of the Broadland Community Partnership	8a: Yes. No Comment – the BCP is not a body with the expert knowledge to question this recommendation	Broadland	Support noted	No change
CIL070	Cringleford Parish Council	8a: Yes	All	Support noted	No change
CIL071	Long Stratton Parish Council	8a: Yes	South Norfolk	Support noted	No change
CIL072	The Planning Bureau Ltd on behalf of McCarthy & Stone	8a: No Comment	All	Noted	No change
CIL074	Taverham Parish Council	8a: Yes	Broadland	Support noted	No change
CIL075	Graham Tuddenham	8a: Yes		Support noted	No change

Question 9:	9a: It is intended that the rates of charge for all other Community Uses will be £0 per m2. Do you agree with this approach?
	9b: If you answered no to the above question, What should the charge be?
Total number of respondents: 35 Yes: 31 No: 4	
Summary of Issues Raised:	
<ul style="list-style-type: none"> • There was a lot of support for a NIL rate • Some respondents supported a nominal rate • There was some concern that commercial uses in this use class should be charged more 	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	9a: Yes	Broadland	Support noted	No change
CIL004	Country Land & Business Associations Ltd	9a: Yes	All	Support noted	No change
CIL007	Stratton Strawless Parish Council	9a: No 9b: Frequently planning is allowed for settlement expansion because of the 'community gain'. We would suggest that all infrastructure costs associated with such permissions are met by the applicants.	Broadland	The CIL Regulations 2010 (amended) do not allow for CIL to be used to support policy. Infrastructure projects will be financed according to the published Regulation 123 list.	No change
CIL009	Stockton Parish Council	9a: Yes Difficult enough as it is to get funding for community projects		Support noted	No change
CIL014	Val Shepherd on behalf of Temlemere Residents Association	9a: No. All development gives rise to some cost in terms of the local area, transport, impact on the environment etc. so there should always be some token charge. 9b: A token amount.	All	The authorities consider that not-for-profit community development under this category cannot demonstrate viability in the same way as commercial development and so therefore a nil rate is applicable	No change
CIL020	Postwick with Witton Parish Council	9a: Yes	Broadland	Support noted	No change
CIL025	Norfolk Fire & Rescue Service	9a: Yes. We agree with the principle of this approach, and would strongly advocate that the Levy should not be applicable to Fire and Rescue Service building developments as 1) they have no commercial intent, and 2) they are a community asset protecting the community. We would also suggest the same would apply to other emergency service use. Our longer term aspiration is to achieve multi-emergency service use. In context to CIL bids, we believe this approach should be outside the Levy. We see the potential for a financial contradiction under the current proposal i.e. on one hand we would have to pay the levy for the development of a new station, and then receive money from the GNDP to pay for the build. We would reiterate the point that fire stations are a community asset and should not be liable for payment of the Levy.	All	It is accepted that some fire and rescue service buildings and ambulance stations could be viewed as community assets with no commercial intent and so therefore could be included under this category.	This response needs further consideration. It is suggested that Fire Stations, Ambulance stations and Police Stations (which fall within the sui generis use class) should be subject to a £0 per square metre charge.
CIL026	Marlingford and Colton Parish Council		South Norfolk	Noted	No change
CIL027	Horsford Parish Council	9a: Yes	Broadland	Support noted	No change
CIL029	Orbit Homes	9a: Yes. A clear definition needs to be provided for what constitutes community uses, but otherwise the recognition that this use should be CIL exempt is positive.	All	Support noted. Charging schedule clearly specifies applicable use classes	No change
CIL031	Norton	9a: Yes	South Norfolk	Support noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Subcourse Parish Council				
CIL032	Salhouse Parish Council	9a: Yes	All	Support noted	No change
CIL033	Michael Sida	9a: No. Not for commercially run care homes 9b: £25/m2 If run as a commercial enterprise a charge should be levied.	All	Viability evidence suggests that care homes could support a rate of £5 per square metre however residential care homes are often provided by the local authority on a not for profit basis. The authorities consider that not-for-profit community development cannot demonstrate viability in the same way as commercial development. In practice it is difficult to differentiate commercial and non-commercial development of the same type so it is proposed to apply a zero rate to all use classes C2, C2A and D1.	No change
CIL034	Newton Flotman Parish Council	9a: Yes	All	Support noted	No change
CIL036	Hales and Heckingham Parish Council	9a: Yes	All	Support noted	No change
CIL038	Hugh Ivins	9a: No 9b: £25	Broadland	No evidence submitted to justify an alternative rate.	No change
CIL040	Ptarmigan Land Ltd	9a: Yes		Support noted	No change
CIL041	Garth Hanlon (Savills) on behalf of Honingham Thorpe Farms LLP	9a: Yes		Support noted	No change
CIL047	Beyond Green Ltd	9a: Yes	All	Support noted	No change
CIL050	Dickleburgh and Rushall Parish Council	9a: Yes		Support noted	No change
CIL052	Cecil Elliston Ball (Town Planning Intelligence) on behalf of Zurich Assurance Limited	9a: Yes	All	Support noted	No change
CIL053	Diss Town Council	9a: Yes	All	Support noted	No change
CIL054	Aylsham Town Council	9a: Yes	Broadland	Support noted	No change
CIL055	Stephen Heard on behalf of SNUB	9a: Yes	All	Support noted	No change
CIL057	Jon Clemo on behalf of Norfolk Rural Community Council	9a: Yes. We do agree this approach. The effects of the recession in terms of percentage cuts to budgets have tended to hit community and third sector groups far harder than the public sector. The needs of communities are likely to grow during recession and we applaud a consistent approach to promoting and supporting community resources.	All	Support noted	No change
CIL058	Alan Richard Williams on behalf of SNUB	9a: Yes	All	Support noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL062	Savills (L&P) Ltd In conjunction with Norfolk Homes and Endurance Estates on behalf of Easton Land Owners Consortium	9a: Yes	All	Support noted	No change
CIL063	Andrew Leeder on behalf of the Leeder Family	9a: No comment at this stage		Noted	No change
CIL063	Mr A B Walker	9a: Yes	All	Support noted	No change
CIL067	Redenhall with Harleston Town Council	9a: Yes	South Norfolk	Support noted	No change
CIL068	Bunwell Parish Council	9a: Yes	All	Support noted	No change
CIL069	Kate de Vries, on behalf of the Broadland Community Partnership	9a: Yes. We do agree this approach. Third sector partners have commented that the effects of the recession in terms of percentage cuts to budgets may hit community and third sector groups harder than the public sector. The needs of communities are likely to grow during recession and we applaud a consistent approach to promoting and supporting community resources.	Broadland	Support noted	No change
CIL070	Cringleford Parish Council	9a: Yes	All	Support noted	No change
CIL071	Long Stratton Parish Council	9a: Yes	South Norfolk	Support noted	No change
CIL072	The Planning Bureau Ltd on behalf of McCarthy & Stone	9a: Yes. My Client would like to express their support for the CIL rate of £0 per m ² for all C2, C2A and D1 land uses. McCarthy and Stone provide an (Assisted Living) Extra Care Housing product aimed at enabling independent living for the 'frail elderly', typically persons aged 80 and over. These are considered as a C2 use. The extra care concept provides day to day care in the form of assistance and domiciliary care tailored to owners' individual needs, enabling the frail elderly to buy in care packages to suit their needs as they change. It provides further choice for the frail elderly allowing them to stay in their own home and maintain a better sense of independence, enhancing their personal welfare over time rather than through the fixed costs of a nursing or residential care with it's one for all approach. Accordingly, Extra Care housing possesses a number of 'enhanced facilities' in terms of the communal facilities available and provides a higher level of care when compared to private retirement housing. It is therefore a different form of specialised housing for the elderly than retirement housing and provides the increasingly elderly population with more choice and with an alternative type of accommodation to meet their needs as frailty increases. The provision of suitable accommodation for the frail elderly will be of critical importance to the Greater Norwich area and the UK on the whole, as the Office of National Statistics projects this age group will see the fastest rate of population growth. We therefore commend the Council for the £0 per m ² CIL rate for C2 and suggest that this rate be extended to all developments which will provide specialised accommodation for the elderly.		Support noted	No change
CIL074	Taverham Parish Council	9a: Yes	Broadland	Support noted	No change
CIL076	United Business and Leisure Ltd and Landowners Group Ltd	9a: Yes	All	Support noted	No change

Question 10:	10a: It is intended that the rates of charge for all other types of development (including shared-user garages) covered by the CIL regulations will be £5 per m2. Do you agree with this approach?
	10b: If you answered no to the above question, What should the charge be?

Total number of respondents: 33
Yes: 19 No: 9 No comment: 5

Summary of issues raised:

- Is there a need for exceptional circumstances
- Some respondents thought the CIL rate on new investment covering the business and industrial sectors cannot be supported at a time when growth and investment is a priority.
- Some thought the rate should vary depending on the use
- There was some concern that the admin of this charge would be high compared to the potential income

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	10a: No Could there possibly be a need for exceptional circumstances	Broadland	The Charging Schedule should cover all types of development. The only exemptions from CIL are set out in the CIL Regulations 2010 (as amended)	No change
CIL004	Country Land & Business Associations Ltd	10a: No We are concerned to note that there is no reference to "agricultural, horticultural and forestry development" in the charging schedule. By not being expressly stated, there is a risk that its inclusion or otherwise will be left open to interpretation. As the charging schedule stands, "agricultural, horticultural and forestry development", because it is not specifically listed, could fall within the "all other types of development" category and this cannot have been intentional. If it was, then we would fundamentally object. A charge of £5 per sq m would add a disproportionate burden to all "agricultural, horticultural and forestry development". There is no viability assessment to justify such a charge. Many buildings required by rural businesses are replacing obsolescent ones with no consequential impact on infrastructure at all. Any increase in the value of the property is directly related to the costs of the new building and there is little or no enhancement in the overall land value. They are generally not buildings into which people normally go. We propose that "agricultural, horticultural and forestry development" is clearly added to the uses already set at a zero charge to avoid any confusion over the matter. This is the approach already taken by other local authorities, including Newark and Sherwood District Council and therefore would be more consistent. 10b: see comments above	All	It is intended that £5 psqm applies to all buildings in these uses. Where new build is replacing an obsolete building in use, only net new floor space will be cillable	No change
CIL007	Stratton Strawless PC	10a: No 10b: NIL See previous response for garages.	Broadland	Noted. No evidence submitted to justify an alternative rate	No change
CIL009	Stockton Parish Council	10a: Not sure how many developments this would involve so hard to judge appropriate tariff.		Response: Noted	No change
CIL014	Val Shepherd on behalf of Templemere Residents Association	10a: No. This would be open to abuse because it is so low compared with the rates for other types of development. It would be better to have the previous charges and to allow exemptions in some cases like these if that can be justified by the developer. The admin in collecting all these charges seems to have been underestimated. 10b: Exemptions only where justified.	All	No evidence submitted to justify changing the CIL rate. The only exemptions from CIL are set out in the CIL Regulations 2010 (as amended)	No change
CIL020	Postwick with Witton Parish	10a: Yes	Broadland	Support noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Council				
CIL025	Norfolk Fire & Rescue Service	10a: No. The current proposal would see the application of the Levy to Fire and Rescue Service property developments. We would refer you to our response in 9a above, and further highlight our view that the Fire and Rescue Service should not be subject to the Levy as we are a community function and are not a commercial entity.	All	It is accepted that some fire and rescue service buildings and ambulance stations could be viewed as community assets with no commercial intent and so therefore could be included under this category.	This response needs further consideration. It is suggested that Fire Stations, Ambulance stations and Police Stations (which fall within the sui generis use class) should be subject to a £0 per square metre charge.
CIL026	Marlingford & Colton Parish Council		South Norfolk	Noted	No change
CIL027	Horsford Parish Council	10a: Yes	Broadland	Support noted	No change
CIL029	Orbit Homes	10a: As per Q6a, planning policy needs to ensure that adequate parking is provided.	All	Parking is a policy issue outside of the scope of CIL	No change
CIL031	Norton Subcourse Parish Council	10a: No. We don't know what a shared user garage is. 10b: This includes a wide range of uses including, for instance, hotels, industrial and agricultural and these should be at least the same or a multiple of the residential charge, as they have a large impact upon the local community.	South Norfolk	The charges have been set based on viability evidence. No evidence submitted to justify an alternative charge for these types of development Shared user garages include both decked parking serving apartments/flats and also multi-storey car parks for public use. This definition will be added to the glossary in the Background and Context Paper.	No change
CIL032	Salhouse Parish Council	10a: Yes	All	Support noted	No change
CIL033	Michael Sida	10a: Yes		Support noted	No change
CIL034	Newton Flotman Parish Council	10a: Yes	All	Support noted	No change
CIL036	Hales and Heckingham Parish Council	10a: Yes. We have no idea what a shared user garage is	All	Support noted Shared user garages include both decked parking serving apartments/flats and also multi-storey car parks for public use. This definition will be added to the glossary in the Background and Context Paper.	No change
CIL040	Ptarmigan Land Ltd	10a: Yes		Support noted	No change
CIL041	Garth Hanlon (Savills) on behalf of Honingham Thorpe Farms LLP	10a: No. The Savills Planning Team act on behalf of Honingham Thorpe Farms LLP who support the concept of the Norfolk Food Hub at Easton and made the necessary representations and appearances at the Core Strategy stage of the Local Development Framework. The application of a CIL rate on new investment covering the business and industrial sectors cannot be supported at a time when growth and investment is priority. Any burden on the delivery of jobs and investments runs contrary to the government's agenda for growth and any issue that has the potential to drive away growth cannot be supported. A CIL rate being applied to those sectors sends the wrong message out from GNDP and we would fully support a review of the rate to a nil figure consistent with recent work carried out by other local planning authorities i.e. Huntingdonshire. 10b: Nil rate. The justification for the nil rate is based on the threat that any rate has upon these vulnerable sectors. Placing such a burden simply imposes further costs on sectors which are vital to delivering the GNDP agenda.	Broadland, South Norfolk	Change was set based on viability evidence. No evidence submitted to justify an alternative rate.	No change
CIL047	Beyond Green Ltd	10a: Yes	All	Support noted	No change
CIL052	Cecil Elliston	10a: Yes	All	Support noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Ball (Town Planning Intelligence) on behalf of Zurich Assurance Limited				
CIL053	Diss Town Council	Yes	All	Support noted	No change
CIL054	Aylsham Town Council	10a: Yes	Broadland	Support noted	No change
CIL055	Stephen Heard on behalf of SNUB	10a: No		Noted. No evidence submitted to justify an alternative rate	No change
CIL057	Jon Clemo on behalf of Norfolk Rural Community Council	10a: No Comment – Norfolk RCC does not have specialist expertise in this area	All	Noted	No change
CIL058	Alan Richard Williams on behalf of SNUB	10a: It is not clear what other types of development is envisaged. It is therefore impossible to comment	All	Noted	No change
CIL062	Ciara Arundel & Melys Pritchett (Savills) In conjunction with Norfolk Homes and Endurance Estates on behalf of Easton Land Owners Consortium	<p>10a: No Industrial and office development in the GNDP area is barely viable even at the height of the market and to add another layer of cost will fetter the commercial market. The level of speculative development has always been very limited in this area due to viability and the majority of new build industrials and offices have been built as a result of pre-lets or design and build contracts.</p> <p>Furthermore, since late 2007 there has been increasing difficulty in obtaining bank finance for the development of commercial premises, even if pre-let contracts are in place. It cannot be said that this is an abnormality in the market as it has been ongoing for three years and there is no sign that the banking sector will stabilise in the short to medium term. If GNDP want to encourage employment in their area, it is imperative that developers and owner occupiers are given every encouragement to develop buildings. Without this, the overall stock will continue to age and this will make it more difficult to attract larger companies who are seeking quality of accommodation.</p> <p>10b: £0 From 2007, i.e. the height of the market, Promis Data stated that only 23% of office development was speculative with the remainder being either pre-let or on a design and build basis. The total office stock in Norwich sits at 31% below the national average and only 6.1% has been completed since 2004.</p> <p>The Promis data on the industrial sector in Norwich states that only 2.00% of the stock is new. There was no new build over 2010 and take up in the six months to Q4 2010 stood at 53.38% down on the previous six months and significantly below the peak in 2006/2007.</p> <p>This data shows that even at the height of the market, Norwich failed to make any great advances in developing Grade A stock and that it remains a very fragile market. Whilst there were peaks in 2007 based around a viable development, the underlying trend is very static.</p>	All	The rates in the Preliminary Draft Charging Schedule are based on viability evidence. No real evidence submitted to justify an alternative rate.	No change
CIL063	Andrew Leeder on behalf of the Leeder Family	10a: No comment at this stage		Noted	No change
CIL063	Mr A B Walker (Resident)	10a: Yes	All	Support noted	No change
CIL067	Redenhall with Harleston Town Council	10a: Yes	South Norfolk	Support noted	No change
CIL068	Bunwell Parish Council	<p>10a: Yes. The use of the phrase 'Shared-user garages' throughout this document is confusing. Do you mean 'all other developments including the part devoted to 'Shared-User Garages' ? Does this include multi storey car parks?</p>	All	Shared user garages include both decked parking serving apartments/flats and also multi-storey car parks for public use. This definition will be added to the glossary in the Background and Context Paper.	No change
CIL069	Kate de Vries,	10a: Yes.	Broadland	Support noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	on behalf of the Broadland Community Partnership	No Comment – the BCP is not a body with the expert knowledge to question this recommendation			
CIL070	Cringleford Parish Council	10a: Yes	All	Support noted	No change
CIL071	Long Stratton Parish Council	10a: Yes	South Norfolk	Support noted	No change
CIL074	Taverham Parish Council	10a: Yes	Broadland	Support noted	No change
CIL075	United Business and Leisure Ltd and Landowners Group Ltd	10a: Yes	All	Support noted	No change

Question 11: Do you agree with the approach to Discretionary Relief?

Summary of issues raised:

Total number of respondents: 33

Yes: 26 No: 4 Comment : 3

Broadland issues:

Issues relevant to Broadland District

Norwich issues:

Issues relevant to Norwich City

South Norfolk issues:

Issues relevant to South Norfolk

Area wide issues:

- The need to be flexible in reviewing the potential need to introduce discretionary relief
- The need to be flexible in the approach to section 106, and a willingness to review regulation 123 lists to take account of the inclusion within some strategic developments of strategic green infrastructure (beyond that required for the development in question), and the requirement for land transfers for community infrastructure such as schools similar points were made by two development interests This may also raise the question of payment in kind in such instances
- The suggestion that there should be a minimum commitment to an annual review
- Opposition to the use of CIL to support affordable housing, on the grounds it would represent double charging

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	No. Must be properly and honestly policed	Broadland	The current proposal is not to offer discretionary relief, and it is hard to interpret comments on how it should be policed, unless the respondent is suggesting that discretionary relief should be offered, subject to that caveat.	No change
CIL007	Stratton Strawless Parish Council	Yes	Broadland	Support noted	No change
CIL009	Stockton Parish Meeting	Yes	South Norfolk	Support noted	No change
CIL014	Templemere Residents Association	Yes	All	Support noted	No change
CIL020	Postwick with Witton Parish Council	Yes	Broadland	Support noted	No change
CIL025	Norfolk Fire & Rescue Service	Please see our comment at question 15		Most of the comment relates to the spending of CIL, rather than its gathering, and none relates to discretionary relief, other than the comment that building of "new fire stations and equipment" should be exempt from CIL. Fire stations are sui generis, but akin to community uses, and it would therefore face a £0 charge. It is not clear what is meant by equipment, in the context of built development on which CIL might be charged.	No change
CIL026	Marlingford and Colton Parish Council	Yes. We fully agree with 100% relief from CIL for affordable homes	South Norfolk	Support noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL027	Horsford Parish Meeting	Yes	Broadland	Support noted	No change
CIL029	Orbit Homes	Yes. Once again, the key point is to review the position on discretionary relief and individual projects, including large-scale regeneration schemes, may well benefit from the relief if in the specific circumstances is beneficial.	All	Noted The point made in the representation is fair. There may conceivably be specific schemes which will benefit and in which case it would be necessary for the individual charging authority to introduce a discretionary relief policy. This can be introduced subsequent to adoption of the charging schedules, but it appears that European state aid rules will limit the amount of relief which can be offered in individual cases.	No change
CIL031	Norton Subcourse Parish Council	No. We do not agree to discretionary relief being applied on the grounds of viability.	South Norfolk	Noted – the current proposal is not to introduce discretionary relief, and therefore the Parish Council's comments appear to align with current intentions. It would appear that they would go further, however, and close off the option of introducing discretionary relief in future. Given that there may be specific schemes, for example regeneration schemes, where such relief could tip the balance of viability, this does seem an extreme stance.	No change
CIL032	Salhouse Parish Council	Yes	All	Support noted	No change
CIL033	Michael Sida	Yes		Support noted	No change
CIL034	Newton Flotman Parish Council	Yes	All	Support noted	No change
CIL035	Capita Symonds on behalf of Breckland Council	Yes. Breckland Council supports the approach to Discretionary Relief.	All	Support noted	No change
CIL040	Ptarmigan Land	Yes	All	Support noted	No change
CIL047	Beyond Green	Yes. In agreeing with this approach, we place significant weight on the statement in paragraph 12.6 of the "Background and Context" paper that "[t]here will continue to be some flexibility in the negotiation of the terms of any S106 contributions" and on the regular review and updating of the Regulation 123 Schedule. As the promoter of a large site in the area, we are sceptical that the assumed 'discount' of £750 per residential unit for residual Section 106/278 payments is realistic. This is because for large-scale developments what constitute "site specific mitigation measures" (para 10.2) could be much more widely drawn and may well encompass infrastructure that, were development in the same location to be delivered by a series of much smaller and more fragmented schemes, would be expected to be left to CIL – for example strategic green infrastructure, primary roads and land for higher-order community facilities such as primary schools. However, we accept that offering discretionary relief under Regulation 55 would complicate and could undermine the integrity of CIL, and look to the sensible use of the Regulation 123 Schedule to ensure that CIL delivers the infrastructure necessary for development without distortion in respect of its scale or boundaries.	All	Noted: Because CIL is a mandatory charge, the principal remaining flexibility will be in negotiation around section 106 obligations. It is where these exceed the cost of the CIL charge for a given development that the question of discretionary relief becomes relevant. However any such relief would need to be independently assessed, and the scope is limited by European state aid legislation. The regulation 123 indicative policy included in the consultation documents is, as its title states indicative only. Formal regulation 123 statements will need to be developed, and possibly varied in the light of experience once CIL is in place. However the indicative policy does show school buildings, for example, being funded through CIL with the section 106 burden being limited to the conveyance of sites in appropriate developments. In the case of the provision of land, where strategic green infrastructure with a much wider applicability is in question, A more case by case approach will be needed because of the difficulty of defining through "standards" what strategic green infrastructure serves a particular development.	No change
CIL050	Dickleburgh and Rushall Parish Council	Yes	All	Support noted	No change
CIL052	Cecil Ball, Town	We note that section 12 of the "Community and Infrastructure Levy: Background and Context" states that:	All	Noted. Because CIL is a mandatory charge, the	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Planning Intelligence on behalf of Zurich Assurance	<ul style="list-style-type: none"> the current CIL Regulations allow statutory exemptions for charities and social housing at the moment the three Councils think the disadvantages of discretionary relief outweigh the advantages the scope of relief that could be offered is severely limited by European state aid regulations <p>We are currently promoting a site that includes contributions to strategic green infrastructure. It's possible that this, together with the proposed rate of CIL, will be enough to put the project's viability into jeopardy. It seems to us that, given the scheme's direct contribution to strategic infrastructure there is a possibility of "paying twice". We note that Regulation 73 of The Community Infrastructure Levy Regulations 2010 allows transfer of land as a CIL payment in some circumstances. This may resolve the issue although we cannot be sure without a detailed scheme financial assessment.</p>		principal remaining flexibility will be in negotiation around section 106 obligations. It is where these exceed the cost of the CIL charge for a given development that the question of discretionary relief becomes relevant. However any such relief would need to be independently assessed, and the scope is limited by European state aid legislation. The regulation 123 indicative policy included in the consultation documents is, as its title states indicative only. Formal regulation 123 statements will need to be developed, and possibly varied in the light of experience once CIL is in place. However the indicative policy does show school buildings, for example, being funded through CIL with the section 106 burden being limited to the conveyance of sites in appropriate developments. In the case of the provision of land, where strategic green infrastructure with a much wider applicability is in question, A more case by case approach will be needed because of the difficulty of defining through "standards" what strategic green infrastructure serves a particular development.	
CIL053	Diss Town Council	Yes	All	Support noted	No change
CIL054	Aylsham Town Council	Yes	-	Support noted	No change
CIL055	Stephen Heard, on behalf of Stop Norwich Urbanisation	No	All	Noted	No change
CIL057	Norfolk Rural Community Council	Yes. We agree the process. We would wish to see a minimum commitment to an annual review. We would also wish to see a commitment to a transparent review and decision making process, publicly available.	All	Noted. The only review procedure is the same as the initial adoption procedure, and the timescale involved makes an annual review impractical. Nevertheless, it is agreed that, particularly in the prevailing economic circumstances, an early review would be appropriate.	No change
CIL058	Alan Richard Williams, on behalf of Stop Norwich Urbanisation	Yes. There is one reservation and that arises out of the suggestion that CIL can be used for the provision of affordable houses. It does not seem reasonable to expect private builders or private buyers who have already paid a premium for their property to be also paying for the construction of affordable houses.	All	Support noted. The potential for CIL to be used to support affordable housing is part of a wider consultation currently being undertaken by the Central Government.	No change
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	Yes	All	Support noted	No change
CIL063	Andrew Leeder, on behalf of The Leeder Family	No comment at this stage		Noted	No change
CIL066	Mr A B Walker	Yes	All	Support noted	No change
CIL068	Bunwell Parish Council	Yes	All	Support noted	No change
CIL069	Broadland Community Partnership	Yes. We agree the process. We would wish to see a minimum commitment to an annual review. We would also wish to see a commitment to a transparent review and decision making process, publicly available.	Broadland	Note. The only review procedure is the same as the initial adoption procedure, and the timescale involved makes an annual review impractical.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				Nevertheless, it is agreed that, particularly in the prevailing economic circumstances, an early review would be appropriate.	
CIL070	Cringleford Parish Council	Yes	All	Support noted	No change
CIL072	The Planning Bureau, on behalf of McCarthy & Stone	Yes		Support noted	No change

Question 12: Do you have any comments about the draft policy 'staging of payments'?

Total number of respondents: 37

Yes: 18 No: 18 Comment: 1

Summary of Issues raised:

- Parish Councils in both Broadland and South Norfolk expressed concern that staging will result in the share to be passed to the community been delayed, though without objecting to the principle of staging.
- Conversely, a number of respondents refer to the possibility of relating stages to the progress of development, and differentiating between types of development.
- A number of representations, principally, but not exclusively, from development interests express the view that the percentage of payments due at each stage is too "frontloaded" or that the stages should be elongated. They argue this would assist viability, because in larger developments, early stages are characterized by investment, while revenue starts to predominate later in a scheme.

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	No	Broadland	Noted	No change
CIL007	Stratton Strawless Parish Council	No	Broadland	Noted	No change
CIL009	Stockton Parish Meeting	No	South Norfolk	Noted	No change
CIL014	Templemere Residents Association	No	All	Noted	No change
CIL020	Postwick with Witton Parish Council	Yes	Broadland	Noted, though no specific comments appended.	No change
CIL025	Norfolk Fire & Rescue Service	Yes Should the Fire and Rescue Service seek CIL funding and be successful, how would the GNDP assure payment to the Fire and Rescue Service and manage inflationary costs should they arise.	All	Noted. This does not specifically relate to the staging of payments	No change
CIL026	Marlingford and Colton Parish Council	No Comment	South Norfolk	Noted	No change
CIL027	Horsford Parish Meeting	No	Broadland	Noted	No change
CIL029	Orbit Homes	Yes The principle of paying CIL in instalments is positive, although it may be better linked to completion of dwellings/commercial space rather than days after commencement, in line with "trigger points" as used in S106 agreements. In longer-term developments, market conditions are the driver for delivery and CIL should work in pace with this, rather than the commencement date. Delivery of infrastructure should be linked to the delivery of the residential/commercial.	All	Noted. An earlier draft of a staging policy attempted to relate payments to development progress, and differentiate between commercial and residential developments, but advice from CLG was that this would be unacceptable under the terms of the regulations governing CIL. The CIL amendment regulations introduced in 2011 require that a staging policy should include only: a) <i>the date on which it takes effect, which must be no earlier than the day after the instalment policy is published on the website;</i> b) <i>the number of instalment payments;</i> c) <i>the amount or proportion of CIL payable in any instalment;</i> d) <i>the time (to be calculated from the date the development is commenced) that the first instalment payment is due, and the time that any subsequent instalment payments are due; and</i> e) <i>any minimum amount of CIL below which CIL may not be paid by instalment.</i> This explicitly relates stages to time in relation to the	Amend the policy by varying the percentage contribution at different stages, with a degree of "back loading" to assist viability

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				date the development commences. Similarly, it cannot differentiate between different types of development	
CIL031	Norton Subcourse Parish Council	<p>No</p> <p>We agree with staging, but the timescales are too long. We suggest for £2m+ a quarter at:</p> <p>60 days before commencement 60 days after commencement 180 days after commencement 360 days after commencement</p> <p>For £1-2m in 3 phases 60 days before commencement 60 days after commencement 180 days after commencement</p> <p>For £60k-1m in 2 phases On commencement 180 days after commencement</p> <p>Under £60k On commencement</p>	South Norfolk	Noted. The default position, when no staging policy is in place is for payment to be made at the end of 60 days following the intended commencement date (amended regulation 70). The requirement for staging policies does not set an "earliest date" where payment could be collected, but it would appear unreasonable to use the staging policy to seek an earlier payment. Payment before commencement is not practical, as it would not be a possible to determine the commencement date before the receipt of the commencement notice. Regulation 67 requires this to be submitted no later than the day before development is due to commence.	No change In response to this representation, but see also response to representation CIL O29
CIL032	Salhouse Parish Council	No	All	Noted	No change
CIL033	Michael Sida	No		Noted	No change
CIL034	Newton Flotman Parish Council	Yes	All	Noted, though no specific comments appended.	No change
CIL035	Capita Symonds on behalf of Breckland Council	No		Noted	No change
CIL038	Hugh Ivins	<p>Yes</p> <p>While the 'staging' is accepted the payment of 'equal instalments' is not (apart from 4 instalments) and should be phased as :-</p> <p>2 instalments 25/75 3 instalments 25/25/50 4 instalments 25/25/25/25</p>	Broadland	<p>Noted. In understanding the way the published indicative policy might work, it is helpful to keep in mind that, for residential development within the inner charging zone, 4 instalments would apply to developments of around 165 dwellings upward, three instalments would apply to developments of around 83 -165 and dwellings, while 2 instalments would apply to developments of around 5 -83 dwellings upward, based on average dwelling sizes. It is important to recognize that a development of around 83 dwellings might take one and a half to two years, while a development of around 165 dwellings might take three and a half to four years. Other developers have made the point that in the case of a larger development the early stages are characterised by investment in servicing and preparing the site, while income, in the form of sales tends to predominate later in the development period. There may therefore be a case for looking back loading the percentages payable rather than equal instalments. The range covered by two instalments is large, and, in the inner area would apply for developments upward of about five dwellings. In some ways, the threshold is therefore pitched extremely low, but this may be an acceptable price to pay for enabling staging of payments for commercial development which is generally less viable than residential. It is also important to keep in mind that, because stages are related to time rather than development</p>	Amend the policy by varying the percentage contribution at different stages, with a degree of "back loading" to assist viability

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				progress, the risk of a developer avoiding payments by failing to complete a development should not arise. The main risk with an instalment policy is that the developer becomes insolvent (which could equally apply to instalments related to development progress, or to the section 106 regime).	
CIL040	Ptarmigan Land	Yes We would very much encourage the authorities to produce an Instalment Policy. We would caution against speeding up the staging of the CIL payments compared to the current S106 contribution system as this will ultimately put more pressure on the financial viability of developments.	All	Noted. An earlier draft of a staging policy attempted to relate payments to development progress and more akin to the section 106 system, and differentiate between commercial and residential developments, but advice from CLG was that this would be unacceptable under the terms of the regulations governing CIL. The CIL amendment regulations introduced in 2011 require that a staging policy should include only: a) <i>the date on which it takes effect, which must be no earlier than the day after the instalment policy is published on the website;</i> b) <i>the number of instalment payments;</i> c) <i>the amount or proportion of CIL payable in any instalment;</i> d) <i>the time (to be calculated from the date the development is commenced) that the first instalment payment is due, and the time that any subsequent instalment payments are due; and</i> e) <i>any minimum amount of CIL below which CIL may not be paid by instalment.</i> This explicitly relates stages to time in relation to the date the development commences. Similarly, it cannot differentiate between different types of development	Amend the policy by varying the percentage contribution at different stages, with a degree of "back loading" to assist viability
CIL041	Savills on behalf of Ian Alston, Honingham Thorpe Farms	Yes The staging of payments is a key issue for the CIL system and the need for flexibility and phasing is an absolute crucial issue for larger developments within the Core Strategy. Within appendix 4 of the document the Schedule sets out a sliding scale of instalments dependant upon the amount of CIL payable. Whilst we support the logic of the approach we remain concerned about the onus placed upon the developer to pay significant amounts of money at those trigger points. We consider that at least one further instalment period should be added to each of the four scenarios and extended by a further 60 days to allow for easier payment.	-	Noted. In understanding the way the published indicative policy might work, it is helpful to keep in mind that, for residential development within the inner charging zone, 4 instalments would apply to developments of around 165 dwellings upward, three instalments would apply to developments of around 83 -165 and dwellings, while 2 instalments would apply to developments of around 5 -83 dwellings upward, based on average dwelling sizes. It is important to recognize that a development of around 83 dwellings might take one and a half to two years, while a development of around 165 dwellings might take three and a half to four years. Other developers have made the point that in the case of a larger development the early stages are characterized by investment in servicing and preparing the site, while income, in the form of sales tends to predominate later in the development period. There may therefore be a case for looking back loading the percentages payable rather than equal instalments. The range covered by two instalments is large, and, in the inner area would apply for developments upward of about five dwellings. In some ways, the threshold is therefore pitched extremely low, but this may be an acceptable price to pay for enabling staging of payments for commercial development which is generally less viable than residential.	Amend the policy by varying the percentage contribution at different stages, with a degree of "back loading" to assist viability

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
				<p>The inability to differentiate between land uses makes it difficult to come up with sensible thresholds which apply to both residential and commercial development. The threshold suggested in the indicative policy would imply that comparison or small convenience retail and leisure and assembly development (£25 per square metre) would be staged from about 2,400 square metres upward, while class B uses (£5) would not be staged until about 12,000 square metres. Large-scale convenience retail (£135) would be staged because of the 2000 square metre threshold in the indicative policy</p> <p>It is also important to keep in mind that, because stages are related to time rather than development progress, the risk of a developer avoiding payments by failing to complete a development should not arise. The main risk with an instalment policy is that the developer becomes insolvent (which could equally apply to instalments related to development progress, or to the section 106 regime)</p>	
CIL045	Morston Assets Ltd	<p>Yes</p> <p>We support the proposed introduction of an instalment policy so that a CIL amount above £59,999 can be paid in stages.</p>	All	Support noted	No change
CIL047	Beyond Green	<p>Yes</p> <p>We understand the policy to take “commencement” to refer to a full planning consent. Therefore, for instance, an outline approval for 1,000 homes to be brought forward in five two-year phases of 200 units, each with its own reserved matters application, would have five commencement dates and in effect pay its liability over a ten-year period.</p> <p>We consider this approach to be sensible with regard to realistic approaches to phasing and very substantial time-value-of-money which could render development unviable if the liability had to be met in full upfront (or over the first two years of a ten year development)</p>	All	Support noted. The representation is correct that liability will be calculated on the grant of full planning permission, or reserved matters, and it will be payable on commencement of the development authorised by the relevant permissions/ reserved matters. Regulation 9 is clear that when outline planning permission is granted for a development to be constructed in phases, each phase is a separate chargeable development This will lead to some complication in that section 106 obligations will need to be negotiated on the outline.	No change
CIL050	Dickleburgh and Rushall Parish Council	No		Noted	No change
CIL052	Cecil Ball, Town Planning Intelligence on behalf of Zurich Assurance	<p>Yes</p> <p>We agree with the general policy of phased payments linking payment liability to actual development rather than granting of planning permission. Indeed we would strongly oppose any proposal that required payment at the time of permission. Payment should, as is common with section 106 contributions, be at completion.</p>	All	Support noted – however the regulations are clear that in the absence of a staging policy, payment is due no later than 60 days after commencement. The introduction of a payment staging policy along the lines of the indicative one in the consultation documents would be an attempt to ease the viability of concern simplicity in this comment. However, it is clear from the limitations on the content of a staging policy outlined in response to representation CIL 029 that such a policy must relate to dates rather than development progress.	Amend the policy by varying the percentage contribution at different stages, with a degree of “back loading” to assist viability
CIL053	Diss Town Council	<p>Yes</p> <p>Staged payments of CIL spread across a time period seems a sensible approach especially to make it more affordable for developers, however there may be a number of factors that affect a developers ability to complete a development, or stages of a development within the time period set out in the proposals. Could it not be, as now with s106 payments that staged payments are made once a percentage of the total number of dwellings approved have been completed?</p> <p>For developments incurring CIL liability of £60,000 to £999,999 with two equal instalments, the first to be 60 days after commencement would be a significant financial outlay if, for example, it was at the higher end of this range, so early on in the development. Does this approach not risk the development becoming unviable as a result of the CIL levy?</p>	All	Noted. As explained in the response to the previous comment, it is not possible to relate stages to development progress. However, others have made the point that the initial stages of development are characterised by heavy investment, and a more graduated approach to the percentage of contribution, with some “back loading” might be appropriate	Amend the policy by varying the percentage contribution at different stages, with a degree of “back loading” to assist viability

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL054	Aylsham Town Council	No	Broadland	Noted	No change
CIL057	Norfolk Rural Community Council	No	All	Noted	No change
CIL058	Alan Richard Williams, on behalf of Stop Norwich Urbanisation	Yes There seems to be greater latitude for non residential sites than for residential. Why is that?	All	Initially the indicative policy as originally drafted did differentiate because of the difficulty of establishing appropriate thresholds for different levels of charge, and because it sought to relate the charge to the progress of development as many have advocated. This is relatively easy in terms of individual houses, but more difficult in terms of commercial buildings, hence the difference in approach. However advice from CLG was that such refinements would not comply with the CIL regulations. A single policy covering all uses and related to time rather than development progress will need to be used, if a staging policy is introduced	Amend the policy by varying the percentage contribution at different stages, with a degree of "back loading" to assist viability
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	Appendix 4 of the CIL: Background and Context (draft?) states that for residential development, payment will be phased according to the progress of the development, measured by commencement of a proportion of the units permitted. It also sets out a notional assumed build rate if the development does not progress as intended. The notional build rate states that the first commencement will take place six calendar months after the commencement of the development and thereafter, commencements will progress at a rate of one unit per week unless it can clearly be shown that this would not be achievable. The published CIL: Background and Context is not as explicit and merely sets out the proportion and timing of instalments depending on the size of the scheme. If these have been based on the initial approach, this seems inequitable for two reasons. Firstly, if a scheme is not progressing it is usually down to sale or funding issues, not because a house builder merely decides to stop building for a while. If the developer is struggling to find finance for the next phase or there are simply no buyers in the market place, then it is very unlikely they will have the facility to pay the next phase of CIL. Secondly, I know of no circumstances where house builders build and sell one unit per week. The norm is circa 20 to 30 units per annum.	All	Initially the indicative policy as originally drafted did differentiate because of the difficulty of establishing appropriate thresholds for different levels of charge, and because it sought to relate the charge to the progress of development as many have advocated. This is relatively easy in terms of individual houses, but more difficult in terms of commercial buildings, hence the difference in approach. However advice from CLG was that such refinements would not comply with the CIL regulations. A single policy covering all uses and related to time rather than development progress will need to be used, if a staging policy is introduced This is reflected in the published CIL: Background and Context. While this policy has the merits of simplicity, many have commented that the equal percentage contributions required at each stage represents an unreasonable front loading of payment, and it may be appropriate to consider a more graduated approach with "back loading" of percentages.	Amend the policy by varying the percentage contribution at different stages, with a degree of "back loading" to assist viability
CIL063	Andrew Leeder, on behalf of The Leeder Family	Yes The Leeder Family would note that the Long Stratton Bypass to be funded and delivered through a combination of CIL/S38 will require phasing of development to release funding to carry out the appropriate advance works necessary to commence construction. This will need to be considered in the overall programme of development and infrastructure to be set out in the LIPP. The mechanism must allow for continuity of funding key infrastructure projects once commenced.		Support noted. The phasing of development will need to be agreed at the outline planning permission stage, which will establish a sequence of "chargeable developments". The purpose of the LIPP is indeed to coordinate investment of resources drawn from a number of sources.	No change
CIL065	Old Catton Parish Council	Yes If the Parish Council is to provide play and recreation facilities for the occupants of the new homes it is essential that it receives its 'share' at the beginning of construction	Broadland	Support noted. The timing of payments to local communities of the "meaningful proportion" is likely to be governed by changes to the regulations to take into account the provisions of the Localism Act. The draft proposal on which the Government is consulting provides for payment to communities twice a year, though this could be varied by agreement. This will be a matter for agreement between individual charging authorities and their communities in the light of the finalised regulations.	No change
CIL066	Mr A B Walker	Yes	All	Noted, though no specific comments appended.	No change
CIL068	Bunwell Parish Council	No		Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL069	Broadland Community Partnership	No No Comment – the BCP is not a body with the expert knowledge to question this recommendation	Broadland	Noted	No change
CIL070	Cringleford Parish Council	No	All	Noted	No change
CIL071	Long Stratton Parish Council	No	South Norfolk	Noted	No change
CIL072	The Planning Bureau, on behalf of McCarthy & Stone	No	All	Noted	No change

Question 13:	Do you agree with the approach to payment in kind?
Total number of respondents: 33	
Yes: 28 No: 5	
Summary of Issues Raised:	
<ul style="list-style-type: none"> The majority of responses (75%) to the question on “payment in kind” (question 13) support the approach set out in the Preliminary Draft Charging Schedule; Several respondents would like to see further clarification expressed on the “payment in kind” issue in the Charging Schedule; Several respondents feel that the approach in the emerging Charging Schedule is unfair and effectively penalises larger developments over smaller scale development by making the larger scale development give over land “free of charge” (e.g. where there is a need for a new school) and pay CIL. Whereas smaller developments can potentially provide land as a payment in kind; A further issue is raised in respect of Green Infrastructure and the potential for this to undermine viability of a development. 	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	No Not convinced	Broadland	Comments noted	No change
CIL007	Stratton Strawless Parish Council	No. If land is required as suggested then that land and its value should be totally covered by the developer.	Broadland	Noted. It would be unfair to expect all development, particularly smaller scale development, to provide land free of charge where it is not needed as a consequence of that development.	No change
CIL009	Stockton Parish Meeting	No. Developers already struggling → payment in kind should be more readily accepted with less restrictions.	South Norfolk	Noted. It is considered reasonable that larger scale developments should provide where necessary land free of charge if it directly related to the development i.e. required to mitigate the impact of the development.	No change
CIL014	Templemere Residents Association	Yes	All	Support noted	No change
CIL020	Postwick with Witton Parish Council	Yes	Broadland	Support noted	No change
CIL025	Norfolk Fire & Rescue Service	We have no comment to make on this point		Noted	No change
CIL026	Marlingford and Colton Parish Council	No Comment	South Norfolk	Noted	No change
CIL027	Horsford Parish Meeting	Yes		Support noted	No
CIL029	Orbit Homes	Yes. The principle of the payment in kind policy is positive, although it needs to be linked in with the site specific allocations. This will ensure that where land is required within a development to provide built infrastructure, it is clearly stated in the planning policy for, ensuring the appropriate land value is attributed and avoiding CIL negotiations at a later date. However, it should be considered by the Authority whether the developer of the site is better placed than the Authority itself to lead on the build of the necessary on-site infrastructure, albeit that the land would be transferred to the Authority at nil value.	All	Officer response – Comments are noted. The issues raised in the representation may be best dealt with through the respective district council’s Site Specific Allocations Development Plan Document or through specific Area Action Plans (AAPs) covering a particular site. These LDF documents could provide clarification on those infrastructure items the development will have to provide through the S106 process, such as the free provision of land on larger scale development for schools etc.	No change in respect of arrangements for in kind contribution, but the background context document could be amended in the section dealing with section 106/CIL to clarify that procurement using the developer as a contractor may be appropriate in some instances. - see paragraph 10. 5 of proposed

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
					background and context document
CIL031	Norton Subcourse Parish Council	Yes	South Norfolk	Support noted	No change
CIL032	Salhouse Parish Council	Yes	All	Support noted	No change
CIL033	Michael Sida	Yes – at the current market price		Support noted	No change
CIL034	Newton Flotman Parish Council	Yes	All	Support noted	No change
CIL035	Capita Symonds on behalf of Breckland Council	Yes. The approach to payments in kind appears reasonable.	All	Support noted	No change
CIL040	Ptarmigan Land	Yes	All	Support noted	No change
CIL045	Morston Assets Ltd	Yes	All	Support noted	No change
CIL047	Beyond Green	<p>The policy requires some clarification to remove potential unfairness to larger schemes. Whereas every development needs accesses, local green infrastructure, etc, only the largest developments will give rise to the outright need for whole new facilities such as primary schools (based on the 2009 GNDP Infrastructure Needs Study a requirement for one new two-form entry primary school arises from every 1,650 homes), community centres, primary care centres, or contribute directly to 'strategic' provision of items such as public art, business incubation, or area-wide green infrastructure. The way the policy is currently construed it appears that, for instance, if 1,700 homes were to be delivered in a single development then land for a school would be required for free under S106 as "built infrastructure to support that development" (para 12.7 of the Background and Context paper) whereas if the same number of homes in the same location were delivered through 17 applications for 100 homes each, such land would be "over and above that needed for the specific development" and purchased via CIL monies or in-kind.</p> <p>This, in effect, implies a higher effective CIL rate on a given development delivered as part of a large scheme than identical development delivered as part of a small one (and thus in effect a cross-subsidy from strategic to piecemeal development). It could encourage developers to 'value shift' by submitting many small rather than one large application, thus enabling the dedication of land in kind rather than for free. Critically, it introduces uncertainty into planning for infrastructure delivery by making the cost of delivering key pieces of infrastructure partly contingent on the scale at which development comes forward. We think the policy should be clarified to make it clear that the 'in-kind' policy applies to land for <i>types</i> of infrastructure, not to the size of the scheme. The types of infrastructure to which it should apply are those which <i>do or could have</i> a catchment wider than the immediate development. This would mainly affect land for education and community buildings such as primary care centres.</p> <p>If this is considered by the Authorities unaffordable then the solution would be to increase modestly the CIL rate, recapturing from all developers the cost of removing a distortion in favour of smaller piecemeal schemes.</p>		<p>Noted. The response suggests that the approach to payments in kind as set out in the draft Charging Schedule (paragraph 8.1) is unfair as larger scale development will be expected to provide necessary land for community infrastructure free of charge, whereas smaller scale development will not and could potentially offer up land as payment in kind (i.e. where the facility, such as a school, is needed to serve more than one development). The respondent suggests that this could result in developers putting forward smaller sites thereby being able to provide land and claim it as "payment in kind".</p> <p>It is unclear whether the respondents suggested approach is significantly different to that set out in the Charging Schedule (paragraph 8.1). However, it is suggested that the text in the Charging Schedule be amended to clarify how land transfer and "in kind payments" could be made in practice, particularly in relation to larger sites (see also officer response made in relation to Rep no: CIL 062).</p> <p>While this argument is understandable, it is generally already the case that such transfers are free, where the land is transferred under section 106. Specifically there is already a difference between the costs for additional pupils generated through the present formula for assessing contributions to expand existing schools, and those instances where it is necessary for a developer to provide a complete school including a site. Under the present CIL proposals CIL would be used to fund the school building with the "free of charge" contribution being limited to the site, without which the development would in any case be unacceptable.</p>	
CIL050	Dickleburgh and Rushall Parish Council	Yes	All	Support noted	No change
CIL052	Cecil Ball, Town Planning	Yes. Please see answer to Question 11. (copied below) We note that section 12 of the "Community and Infrastructure Levy: Background and Context" states that:-	All	Support noted. It would be inappropriate to comment on the merits of a particular development.	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Intelligence on behalf of Zurich Assurance	<p>- the current CIL Regulations allow statutory exemptions for charities and social housing</p> <p>- at the moment the three Councils think the disadvantages of discretionary relief outweigh the advantages</p> <p>- the scope of relief that could be offered is severely limited by European state aid regulations</p> <p>We are currently promoting a site that includes contributions to strategic green infrastructure. It's possible that this, together with the proposed rate of CIL, will be enough to put the project's viability into jeopardy. It seems to us that, given the scheme's direct contribution to strategic infrastructure there is a possibility of "paying twice". We note that Regulation 73 of The Community Infrastructure Levy Regulations 2010 allows transfer of land as a CIL payment in some circumstances. This may resolve the issue although we cannot be sure without a detailed scheme financial assessment.</p>		While in theory it may be possible to treat land transfer associated with Green Infrastructure (GI) in the same way as land transferred for a new school i.e. for it to be treated as payment in kind where it is needed to serve more than one development, there are practical difficulties where there are no readily defined standards which can indicate what level of provision serves a particular development. There are certain priority projects identified in the local investment plan and programme, but delivery in any particular scheme could cover a vast spectrum from unrestricted public access with a wide range of facilities, to limited access by way of some permissive rights of way. Much of this will only become apparent at a more detailed stage, and while payment in kind cannot be ruled out, and it is likely some CIL will be spent on key schemes, it is impossible to be prescriptive at this stage. As projects are firmed up, regulation 123 lists may need to be updated.	
CIL053	Diss Town Council	Yes	All	Support noted	No change
CIL054	Aylsham Town Council	Yes	Broadland	Support noted	No change
CIL055	Stephen Heard, on behalf of Stop Norwich Urbanisation	No	All	Noted	No change
CIL057	Norfolk Rural Community Council	Yes. Any CIL in-kind should be tested on whether it will meet the needs of the local community, and result from active consultation with the community, rather than being for developer convenience. Location of facilities plays a key role in their effectiveness and in the development of social cohesion.	All	Support and comments noted	No change
CIL058	Alan Richard Williams, on behalf of Stop Norwich Urbanisation	Yes	All	Support noted	No change
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	<p>No.</p> <p>We consider that the payment in kind issue needs to be considered very carefully and that the charging schedule needs to be worded accordingly. There are a number of large development areas that should come forward in the GNDP area as a result of road and other improvements. These will undoubtedly necessitate the provision of new schools, neighbourhood centres etc. These sites may well be "kicked off" with a single permission but be owned by a consortium of land owners and be developed by a number of house builders. In such cases it would be inequitable for the land transfer to be considered on a single permission basis.</p>		Noted On large sites where there may be a need for a new school it is anticipated that there would be some pre-application discussion between the applicant (consortium) and the local planning authority. As part of this exercise the need for a new school and transfer of land should be raised. If land is needed for a new school then this should be dealt with at the outline stage and a S106 entered into with the developer/consortium (i.e. as is undertaken at present). In this scenario it is expected that there would be a separate land-owners agreement to ensure no single landowner is disadvantaged. Therefore when the reserved matters applications are submitted/ agreed then CIL would not have to address land transfer issues.	No change
CIL063	Andrew Leeder, on behalf of The Leeder Family	Yes. The Leeder Family are concerned about the legality of some developers inevitably providing free land on top of CIL (where necessary infrastructure happens to be on site) and others providing only CIL but no land (where necessary infrastructure happens to be off-site or on another developers site).		Support and comments noted.	No change
CIL066	Mr A B Walker	Yes	All	Support and comments noted	No change
CIL068	Bunwell Parish Council	Yes	All	Support and comments noted	No change
CIL069	Broadland	Yes. Partners have commented that any CIL in-kind offer (which is intended to benefit local communities)	Broadland	Support and comments noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Community Partnership	should be tested on whether it will meet the needs of the local community, and follow active consultation with the community. It was noted that land transfers have occasionally led to community spaces being sited at inappropriate locations within (or on the edge of) a community.			
CIL070	Cringleford Parish Council	Yes	All	Support and comments noted	No change
CIL071	Long Stratton Parish Council	Yes	South Norfolk	Support and comments noted	No change
CIL072	The Planning Bureau, on behalf of McCarthy & Stone	Yes	All	Support noted	No change

Question 14:	<p>14a: Subject to any updated Regulations it is proposed that 5% of the net CIL receipts be passed to local communities (e.g. the Parish Council or Town Council in the two rural districts) who express an interest in receiving it. Do you agree with this approach?</p> <p>14b: Do you have any views about how the CIL which will be made available for the local community in Norwich, where there are no Parish or Town Councils, should be administered?</p>
<p>14a: Total number of respondents: 36 Yes: 18 No: 16 No comment: 2</p> <p>Summary of Issues Raised:</p> <p>14a</p> <ul style="list-style-type: none"> • concern that parish councillors are not representative of the local community and may not be resourced or have the expertise to deal with the sums of money involved • Concern about which parish receives the funding as the impact of development may be felt more widely • The rate should be higher than 5% to encourage local people to accept growth; 7.5%, 10%, 15% and 25% has been suggested as well as the suggestion that parishes should potentially be administering funds relating to all development in their patch. Lack of understanding re whether funds will need to be requested or will be automatically passed to parish councils • Concern that the % is too high in some areas and may mean that vital infrastructure does not get provided <p>14b</p> <ul style="list-style-type: none"> • The City Council is best placed to decide how funding gets used • Urban areas should be parished- some CIL income could be used to cover the costs associated with this • Ward members should assist officers in deciding which local groups should receive funds • Concern that some local groups are not set up to administer funds or deliver infrastructure • Cross boundary issues raised where a development in the City may impact on neighbouring parishes and vice versa. 	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL002	Mr E A Newberry	14a: No Parish or town councils are prone to pet projects of councillors. Then breaking their own regulations. Separate panel no councillors 14b: Panel of willing locals. No councillors	Broadland	Noted	No change
CIL007	Stratton Strawless Parish Council	14a: No The very least that a parish gets should be 5% gross – but which parish?	Broadland	Noted	No change
CIL009	Stockton Parish Meeting	14a: Yes	South Norfolk	Noted	No change
CIL014	Templemere Residents Association	14a: No 5% is a pitiful proportion. If the government wants local people/councils to have more input to the process and/or there is a move towards a presumption in favour of development then local people should expect a greater proportion of these collected charges as some sort of reward. Question 14b It is nonsense to suggest that any sums can be made available to local groups as that would not be consistent across Norwich. If sites were developed locally to us the Association would expect any monies	All	Noted Meaningful is likely to be defined by Government Regulations following consultation.	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		collected to be used by Norwich City council to upgrade roads/junctions, provide children's play areas (currently non-existent), improve green spaces (few and far between), improve public transport (currently Sprowston Road is not included in bus route improvements) etc. There is also a need to improve rain-water drainage in the immediate vicinity and to provide some community facilities (currently sparse). All of these things were the original aim of the s106 expenditure and need to be continued in some shape or form; otherwise any development will not be sustainable and will have a negative impact on existing communities.			
CIL017	Tasburgh Parish Council	<p>Comments made under Q15 that raise issues relating to this question</p> <p>Tasburgh Parish Council wish to make the following comments with regard to the Preliminary Draft Charging Schedule Consultation:</p> <ul style="list-style-type: none"> i. The Council has noted the consultation but feel that they are unqualified to make a financial decision, however they believe that it is the District Council's responsibility to ensure that they obtain the correct level of contribution from development. ii. In addition there was concern at the term 'meaningful' and that the District Council should be up-front and transparent about the amount that would be passed to Parishes and Communities. <p>I hope this is of benefit in your consultation.</p>		<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL020	Postwick with Witton Parish Council	<p>14a: Yes</p> <p>It is assumed that any administration costs deducted will be at a minimum. Postwick with Witton parish includes most of the business park areas and receipt of CIL will be of considerable help in providing community facilities in a village with a small population and therefore precept</p>	Broadland	Noted	No change
CIL021	Kirby Cane & Ellingham Parish Council	<p>Comments made under Q15 that raise issues relating to this question</p> <p>The Parish Councillors have discussed this consultation and only have two comments to make, therefore it is very difficult for me to fill in the form.</p> <p>The comments are - that they are not in favour, and should this go ahead a more meaningful proportion should go to the Parish Council.</p>		<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL025	Norfolk Fire & Rescue Service	<p>14a: No</p> <p>The provision of Fire and Rescue Service response is the direct responsibility of Norfolk County Council and the Chief Fire Officer. The Fire Authority is obliged to complete an Integrated Risk Management Plan that assesses and quantifies risk, including associated risk profile within our communities. A safety plan details how the Fire Authority will discharge its duty to provide fire and emergency response and includes how it delivers its statutory obligations towards prevention and fire protection measures. Community infrastructure forms part of the assessment of risk and needs to manage and protect communities i.e. larger housing and commercial developments may require additional or improved fire service facilities and capabilities. The Fire and Rescue Service is mandated by the Fire and Rescue Services Act to manage the Fire and Rescue Service response in Norfolk.</p> <p>In context to Q 14a there should be a formalised process on what infrastructure takes precedence over other items, and how these are selected. In relation to this point the Fire and Rescue Service would require formal representation at County level.</p>	All	<p>Noted. These comments relate to the governance arrangements and decision making process relating to CIL funded infrastructure.</p> <p>The County Council are represented on the GNDP Board</p>	No change
CIL026	Marlingford and Colton	14a: No	South Norfolk	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Parish Council	We believe that 10% of the net CIL receipts should be passed to local communities who express an interest in receiving it. 14b: No comments			
CIL026	Marlingford and Colton Parish Council	Comments made under Q15 that raise issues relating to this question As a general principle, developments in one area that have deleterious effects on adjoining areas should lead to part of the CIL coming to the affected area. This arises from Marlingford and Colton Parish Councils consideration, for the LDF consultation, of developments in Easton which will undoubtedly lead to increases in traffic through Marlingford and Colton together with increased light and noise pollution, impact on the landscape, impact on wildlife, reduced air quality and increased litter. It is the Parish Councils view that some of the CIL money that would arise from these developments should come to Marlingford and Colton, to be spent at the Parish Councils discretion on infrastructure projects, of which traffic calming could be an example.	South Norfolk	CIL is a flexible funding stream that can be used for any infrastructure project required to address the impacts of growth.	No change
CIL027	Horsford Parish Meeting	14a: Yes	Broadland	Noted	No change
CIL029	Orbit Homes	14a: Yes Again, the principle is positive, however clear guidance and a time limit for spend would need to be enforced to ensure that the receiving body of the 5% spends the funds appropriately and timely. In some instances where a Parish or Town Council is in place, other community bodies may be better placed to receive the money and ability to do this should be considered. 14b: The approach outlined above at Q14a would work particularly well in the case of Norwich. Potentially the relevant ward member could assist officers within the Authority to identify suitable community groups to receive the funds. Again, appropriateness and timeliness of spend needs to be ensured.	All	Noted	No change
CIL031	Norton Subcourse Parish Council	14a: Yes As long as it is made clear how this money is requested.	All	Noted	No change
CIL032	Salhouse Parish Council	14a: Yes 14b: No views	Broadland	Noted	No change
CIL033	Michael Sida	14a: Yes 14b: No	Broadland & South Norfolk	Noted	No change
CIL034	Newton Flotman Parish Council	14a: Yes	All	Noted	No change
CIL035	Capita Symonds on behalf of Breckland Council	14a: Yes Breckland Council considers that the approach indicated is consistent with both the spirit and detail of the CIL Regulations. In the rural areas, funds could be distributed to groupings of Parishes in a partnership. This could have particular benefits where there is potential for receipts to be spent on facilities that are used in a functional manner by settlements in adjoining Parishes. Breckland Council currently operates such an approach for commuted sums for off-site open space under the current S106 regime.	All	Noted	No change
CIL036	Hale and Heckingham Parish Council	14a: Yes As long as it is made clear how this money is requested. Once the money has been transferred to the parish, does this money have to be spent within a certain time, or can we accumulate this money in an earmarked reserve to put towards a larger project? 14b: In Norwich, perhaps the parish and town council's percentage of the CIL should be used to "parish" the	All	Noted Funding would not need to be requested and there would be no time limit on when it is spent, although details are likely to be confirmed in the amended CIL regulations	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		city.			
CIL040	Ptarmigan Land	14a: Yes	All	Noted	No change
CIL047	Beyond Green	<p>14a: No</p> <p>With CIL funds extremely tight, it is critical that all monies raised are clearly allocated to the delivery of specific pieces of enabling infrastructure. To adopt a blanket policy of passporting 5% (or any %) of funds to parishes without due regard either to need or to proposed programme would contradict both the aims of the CIL policy and the approach taken by Charging Authorities, which is to work together across a wider area to ensure there is a balance of revenue raising and funding which can be allocated flexibly across the area. It is also unclear how the policy would be equitably administered: if the funding raised by development in a given parish were hypothecated to that parish it could result in some receiving £millions; if distributed on a more equalized basis it would lose its connection with infrastructure to support growth.</p> <p>A better approach would be to encourage parishes and neighbourhood forums to use the neighbourhood planning process to identify infrastructure needs and produce business plans that set out what funding and/or developer commitment is required for their delivery. Any gaps could then be filled by CIL up to a maximum of 5% of the revenues for the area.</p>	All	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL050	Dickleburgh and Rushall Parish Council	<p>14a: No</p> <p>Parish Council's are in a unique position to deliver local solutions to the pressures arising from significant new development. Five percent of CIL receipts is wholly inadequate, 15% would be a more appropriate amount. We believe GNDP has a complete misunderstanding of the local council sector. Now local council clerks can gain a qualification in Local Council Administration and local councils themselves can obtain quality status accreditation the sector can demonstrate its professionalism. Local Councils are also able to direct spending in the manner most appropriate to its community. We are concerned that any money raised through the CIL will go into a general fund which local communities will have to apply for on a competitive basis. We hope that finance raised through the CIL will be spent in the communities affected by the new development. There should also be some flexibility, so local councils who are experienced in delivering major projects would be a local project budget holder, delivering required infrastructure for local communities. Thus local councils should not be restricted to being 'given' their meaningful amount. There should be enough flexibility in the system to give them more, if appropriate, as a local delivery agency.</p>	South Norfolk, All	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL052	Cecil Ball, Town Planning Intelligence on behalf of Zurich	<p>14a: No</p> <p>We are very supportive of involving the local community in taking both decisions and being involved in implementing specific development projects. An excellent example can be found in the village of Hockerton, near Southwell Minster in Nottinghamshire. Here the local community set up an Industrial Provident Society called Sustainable Hockerton that has installed a wind turbine with the benefits derived being made available to the community as a whole.</p> <p>Our experience of parish councils is very mixed. Whilst we are sure there are parish councils that have both the drive and relevant expertise to handle significant development projects, there are many others that would struggle. Although democratically constituted bodies, their accountability through the electorate is increasingly compromised by a lack of candidates, resulting in little or even no choice at an election to fill the number of vacancies arising.</p> <p>Consequently we think there will be many instances where organisations such as community land trusts, Industrial Provident Societies and other forms of non-profit community co-operatives would benefit from CIL receipts. Given the focus of such organisations on specific objectives, we think they will be far more effective and efficient in implementing projects than a multi-purpose elected body.</p> <p>14b:</p> <p>Please see answer to Question 4b (copied below)</p> <p><i>As stated in our answer to question 3, we do not agree with the division of the area into Zones A and B, and that a single rate should be applied across the whole of the Greater Norwich Area.</i></p>	All	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p><i>Our instinct is that a rate that works out at £15,000 for an average size dwelling is too high, especially in current market conditions. Whether such a figure would look more comfortable during a period of buoyant growth is another question. However, conditions for the foreseeable future look sluggish at best, and introducing rates at the level suggested feels to us like a disincentive.</i></p> <p>The government is looking to the development industry as an important economic motor to get the national economy out of stagnation. Without looking at our own land holdings in more detail, it's difficult to say what would feel comfortable, but our suggestion is a rate that is psychologically the right side of £100 per square metre. As a result, the planned infrastructure programme would have to be heavily focussed on priorities at the top of the list. Assuming that a lower than expected tariff helps kick start growth, it could establish a virtuous circle that will allow an upward review at a relatively early date and a consequent expansion of the infrastructure programme.</p>			
CIL053	Diss Town Council	<p>14a: No</p> <p>Diss Town Council does not believe that 5% will be sufficient, and from comments made at a conference attended this week, would appear to be nowhere near the amount that the Government is considering as a 'meaningful proportion' of net CIL receipts for local communities (although it is appreciated that guidance on this matter is still awaited).</p> <p>There are a minimum of 300 homes proposed for Diss, but with its history of an average of 100 homes per year built since the war, there is no reason that there wouldn't be up to 1500 more homes in Diss by the end of the current LDF period.</p> <p>Diss Town Council has long argued that there has been insufficient focus paid to the infrastructure needs of Diss that will be required for future development and given that there are virtually no infrastructure requirements identified, the question that we would ask is where would the remaining 95% of CIL levy from developments in the town go?</p> <p>Currently under s106 agreements from larger developments, the town can expect a reasonable contribution toward recreational facilities. As an example, a recent development of 50 homes raised £35,740 for this purpose. Under the CIL levy proposals, 5% will equate to £12,563 – which could be used for any purpose, not just recreation. Also under s106, contributions are made to local walking/cycling strategies, the library and schools amongst others. Will there still be contributions to these services and facilities under CIL to offset the additional demands on them created by the development or do they have to have been identified on the CIL Regulation 123 list to qualify for funding from this source?</p> <p>It would appear that most parishes have no idea of what infrastructure requirements have been identified for each parish/development area, even where larger numbers of houses are proposed. This will make it very difficult for them to establish what their priorities for their element of CIL should be and whether the 5% proposed will be sufficient to help in delivering them. It was suggested that parishes could choose to contribute their CIL levy toward a larger infrastructure project being delivered by others, but how can this be considered when it is not known what those projects are likely to be?</p> <p>We would therefore recommend that 10% should be the minimum that communities receive and that an infrastructure list for each area where development has been identified should be created for appraisal by parishes/communities.</p>	South Norfolk	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p> <p>5% was derived from an estimate of the proportion of the total infrastructure cost made up from local and community projects. If a greater proportion were diverted to local and community projects, less funding would be available to support the essential infrastructure required for the development of the area which has an overall community benefit.</p> <p>Local political decisions will be made to determine the precise infrastructure projects to be delivered</p>	No change
CIL054	Aylsham Town Council	<p>14a: No</p> <p>5% seems low, should be either 7.5% or 10%</p>	Broadland	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL055	Stephen Heard, on behalf of Stop Norwich Urbanisation	<p>14a: No</p> <p>Local authorities in Norfolk ignore the wishes of residents. The residents do not want the JCS or the Incinerator at Saddlebrow but the council continues to ignore petitions etc. Why should there be any trust that CIL will be passed to Parish Councils for use in infrastructure that residents want!</p>	All	Noted	No change
CIL055	Stephen Heard, on behalf of Stop Norwich Urbanisation	<p>Comments made under Q15 that raise issues relating to this question</p> <p>The JCS is not sound. Housing viability continues to deteriorate and therefore assumptions for growth and rising house prices are flawed. This paper changes the basis on which the Councils justified the viability to the Planning Inspectors.</p>	All	The inspectors considered the viability of affordable housing at the JCS Public Examination. The GVA report compares the assumptions used in both studies.	No Change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>The levels of charging cannot therefore be justified.</p> <p>There is inadequate accountability for the disbursement of these sums of money. The paltry level of 5% to local councils is a travesty of any ideas of Localism. The introduction of a Garage Tax is unjustified.</p> <p>The proposals for future changes to the CIL regulations in the future to fund affordable housing is disgraceful. That is not infrastructure.</p>		<p>Meaningful is likely to be defined by Government Regulations following consultation.</p> <p>Garages are part of development as covered by CIL Regulation.</p> <p>The possibility of using CIL to fund affordable housing is the subject of Government consultation.</p>	
CIL057	Norfolk Rural Community Council	<p>14a: No</p> <p>Norfolk RCC does not agree that 5% represents a 'meaningful proportion'. We also have concerns that decisions on the spend for the remaining percentage does not sufficiently involve the community. It is not clear how Broadland District Council has arrived at the figure of 5% of funds. If a particular calculation or principle was used to set the figure, it would be helpful for the community and 3rd sector partners to understand what this is.</p> <p>The aim behind this proposal to return a "meaningful proportion" of funds from development to neighbourhoods is to:</p> <ul style="list-style-type: none"> a) help change local attitudes towards development by ensuring demands on the local infrastructure are met and the local community itself will benefit, and b) allow neighbourhoods to have a meaningful control over funds, either funding local discrete provision, for example, or by contributing to larger projects funded by the district or county council. <p>Firstly it is not clear how the 5% was determined our assumption is that it was calculated on the basis of the estimated costs for those items highlighted within priority 3 of the LIPP (please correct us if this is wrong). If this is so it that these options were not determined by wide consultation with the community who may have different priorities. It is therefore a false premise on which to calculate the infrastructure needs of the community and artificially imposes a budget envelope does not necessarily meet local needs. Secondly, the percentage must be perceived as meaningful not simply produce a meaningful amount. Whilst we recognise that the amounts produced may exceed local community infrastructure needs it is important in giving communities meaningful involvement in decision making on wider infrastructure through spending power not just consultation. It is also important that the perception is that this is a meaningful proportion in order to engage the wider community id discussions about infrastructure requirements. We do not perceive 5% as a meaningful proportion.</p> <p>We would propose 25% of CIL being returned to the community as a true meaningful proportion. This is not to say that the whole 25% should be spent on local community infrastructure but that this provides communities with a meaningful control over infrastructure development.</p> <p>We think it is wrong to assume that our local communities will only have an interest in the very local spend, and no interest in what priority one and two infrastructure items come forward first (school versus road versus GP surgery for example).</p> <p>Our experience with participatory budgeting has shown that our communities are actually able to see the wider picture and that they have been generous in allocating funds to the most needy community projects, rather than to those projects which might support their own vested interests. What we have seen whole communities deliver on a tiny economic scale, we should confidently expect them to deliver on a larger scale.</p> <p>We also recommend to devolve funding decisions to town and parish councils "who express an interest in receiving it". We would like to see within the CIL how the Council (or GNDP collectively) will liaise directly with communities whose parish or town council don't feel able to lead on this debate and decision making process. We would like to see some minimum criteria for community involvement in such processes.</p> <p>Finally, we note the 5% suggested for devolved decision making by the community is the same amount as the charging authority can spend on administration of the CIL itself. The requirement is to devolve a "meaningful proportion" of the total CIL amount. Whilst 5% might provide significant local sums of money, we question whether it actually represents a "meaningful proportion" of the total CIL income. We also suggest the sum allocated to communities must <u>be seen</u> to be meaningful – and it will not take residents long to spot the link to the Council's own admin costs. We therefore suggest the Council consider allocating a higher amount to their communities.</p> <p>14b:</p> <p>If the Councils collectively decided to allocate a sum higher than 5% to community influence and decision</p>	All	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p> <p>5% was derived from an estimate of the proportion of the total infrastructure cost made up from local and community projects. If a greater proportion were diverted to local and community projects, less funding would be available to support the essential infrastructure required for the development of the area which has an overall community benefit.</p> <p>Local political decisions will be made to determine the precise infrastructure projects to be delivered</p>	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>making, then it would make sense to consider a collective involvement strategy which covered the three districts. Where parish and town councils exist they can provide a conduit for their members participation, but it should be possible to create a mechanism whereby any community member could engage directly with the debate.</p> <p>We would draw attention to the increase interest in parishing urban areas which whilst not without challenges would address this issue and support the wider localism agenda.</p> <p>Do please note comments within section 13.</p>			
CIL058	Alan Richard Williams, on behalf of Stop Norwich	<p>14a: No</p> <p>This is an oddly worded question. Is this a pot from which local councils can bid to fund infrastructure projects? If so who decides who gets what? Worse, is there any hope that the District Councils working through this GNDP Board will be more accountable than they have been up to date</p>	Broadland	Noted- if the regulations change as proposed there will be a requirement for the district councils to transfer a fixed % of CIL income to the relevant parish councils	No change
CIL060	Eaton and University Community Forum	<p>14a: Yes</p> <p>I agree with the concept of passing a proportion of the funds to the local communities. There is the question of how the money should be divided up between, say, the parishes. Division into equal parts may not be appropriate E.g. some parishes may have a greater need than others for community facilities, or the parish within which the development is taking place may not be the parish most impacted by the consequences of the development.</p> <p>14b: Community groups exist for some parts of Norwich, but not for others, E.g. The Eaton and University Community Forum covers two of the wards in Norwich. The difficulty with all such groups is establishing their legitimacy to represent the residents in their areas. E.g. The Eaton and University Community Forum has a the group committee whose membership is determined only by those who attend the AGM. There is also the problem of some areas not being organised and so perhaps losing out on funding altogether.</p> <p>Much needs to be clarified as to how the funding is to be distributed.</p> <p>Perhaps the time has come to introduce parish councils into the Norwich City Area. These could be elected in a properly structured and democratic way.</p>	All, Norwich	Noted	No change
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	<p>14a: Yes</p>	All	Noted	No change
CIL065	Old Catton Parish Council	<p>14a: Money should be passed to local communities</p> <p>It is felt that 5% is not enough for the Parish Council to be able to provide any meaningful facilities</p> <p>14b: This would depend on need. For instance development in Norwich at its boundary with Old Catton would create demands on facilities in Old Catton. In this instance the CIL should Education Building payable to Old Catton PC</p>	Broadland	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL066	Mr A B Walker	<p>14a: Yes</p>	All	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL067	Redenhall with Harleston Town Council	<p>Comments made under Q15 that raise issues relating to this question</p> <p>Redenhall with Harleston Town Council has a useful briefing on the intended Community Infrastructure Levy (CIL) by Carole Baker from South Norfolk Council's Planning Department at our October meeting. Following this we have given consideration to the consultation documents.</p> <p>We feel unable to contradict the various charging schedules being proposed as these have received careful consideration by the professional officers at the three local authorities concerned and we lack their experience, expertise and background knowledge. We have no objections to the two charging zones suggested.</p> <p>We welcome proposals that "a meaningful proportion of CIL" be allocated to the neighbourhood where the development is likely to take place. Without additional information as to the actual sums of money likely to be received by our council over the coming years, we doubt that these contributions will trigger major infrastructure projects in our town (e.g. a new community hall). Projects seem likely to be confined to minor activities such as additional allotments, play or gym equipment and small town centre enhancement schemes. We are intending to respond to central government's consultation on these matters. An additional area of concern with regards to the distribution of CIL is where developments may be agreed close to parish boundaries. This could mean that a new development built on that edge of a parish boundary may look to one parish as its service centre, however, a separate parish may benefit from the CIL.</p> <p>We thank you for the opportunity to respond to these consultation and we hope our comments will be useful.</p>		Noted	
CIL068	Bunwell Parish Council	<p>14a: No</p> <p>However, the 5% should be 5% of the GROSS receipts in the interests of clarity and simplicity – and fairness. The default should be for parish and town councils to 'opt in'. If not clearly state in big bold figures that Parish and Town Councils only get 4.75% and not 5%</p> <p>14b: We believe that Norwich should be parished and the residents thereof benefit from the duties and obligations that apply to parishes – that would be true localism.</p>	South Norfolk, All	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p>	No change
CIL069	Broadland Community Partnership	<p>14a: No</p> <p>It is not clear how Broadland District Council has arrived at the figure of 5% of funds to devolve back to communities for decision making. If a particular calculation or principle was used to set the figure, it would be helpful for the community and 3rd sector partners to understand what this is. Our assumption is that the 5% is what the total community infrastructure listing (the priority 3 table) is costed at – but we feel it would be beneficial to clarify this within the CIL documentation.</p> <p>The aim behind the proposal to return a "meaningful proportion" of funds from development to neighbourhoods is to:</p> <ul style="list-style-type: none"> c) help change local attitudes towards development by ensuring demands on the local infrastructure are met and the local community itself will benefit, and d) allow neighbourhoods to have a meaningful control over funds, either funding local discrete provision, for example, or by contributing to larger projects funded by the district or county council. <p>The funding should be sufficiently large to make it easy to engage the <u>whole</u> community: initially in the debate about how funds should be spent, but presumably leading to a far wider conversation within the community on how they wish to see their community looking in five or ten years or twenty years time and therefore what development might be appropriate, and how the planning process can support this. The larger the sum of money, the more likely the Council is to get "whole population" engagement in a longer term and sustained community interest in and debate about development.</p> <p>We do have concerns.</p> <p>Firstly, if the funding allocated to an individual community is small (maybe too small to deliver a local infrastructure project in full or too insignificant for the public to feel that they have a genuine stake in larger development decision making around them) it may be hard to engage the <u>whole</u> community in allocating the funds. Detailed guidance is lacking at this point, but if our assumptions are correct:</p> <ul style="list-style-type: none"> a) that the use of funds is strictly regulated by the CIL and b) that the options for local spend are specified through the LIPP, and therefore "framed" by the 	Broadland	<p>Noted</p> <p>Meaningful is likely to be defined by Government Regulations following consultation.</p> <p>5% was derived from an estimate of the proportion of the total infrastructure cost made up from local and community projects. If a greater proportion were diverted to local and community projects, less funding would be available to support the essential infrastructure required for the development of the area which has an overall community benefit.</p> <p>Local political decisions will be made to determine the precise infrastructure project to be delivered.</p>	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>district council, then we believe the local authority can afford to be generous in the amount is “devolves” to the local communities for allocation.</p> <p>In terms of very local community infrastructure we appreciate that a community may choose something other than the suggested community infrastructure listed in the LIPP – and the local debate will need to take account of the limited funding, and that they can’t return for more money later to get what’s listed in the LIPP (unless presumably they also take additional development).</p> <p>Secondly, we think it is wrong to assume that our local communities will only have an interest in the very local spend, and no interest in what priority one and two infrastructure items come forward first (school versus road versus GP surgery for example).</p> <p>Broadland District Council’s own experience with participatory budgeting has shown that our communities are actually able to see the wider picture and that they have been generous in allocating funds to the most needy community projects, rather than to those projects which might support their own best interests. What we have seen whole communities deliver on a tiny economic scale, we should confidently expect them to deliver on a larger scale.</p> <p>So if communities could (as a whole) have influence and a communal voice at the table over 25%, 50% or even 100% of the CIL, they would certainly be keen to know precisely what the LIPP was, to understand the evidence behind the large scale infrastructure projects, learn how other projects are selected for inclusion, to know how the LIPP will be refreshed, how funding decision over the priorities are arrived at, and to be involved in the decision making process.</p> <p>So this second concern is that the opening recommendation for 5% suggests the Council is not interested in using the collective expertise of our communities to address wider infrastructure issues.</p> <p>Thirdly, the recommendation is to devolve funding decisions to town and parish councils “who express an interest in receiving it”. We would like to see within the CIL documentation comment on how the Council (or GNDP collectively) will liaise directly with communities whose parish or town council don’t feel able to lead on this debate and decision making process. We would like to see some minimum criteria for community involvement in such processes. On average parish plans involved 67% of the community in their development, and we would not wish to see community involvement in key infrastructure funding involving very much less than 50% say of the local community.</p> <p>Do the Council genuinely want this level of understanding and community involvement in infrastructure delivery? There are most certainly costs involved in involving the community and providing them with access to the decision making process. But if a mechanism is required to provide genuine engagement for those residents with no parish or town council, or with a council feeling it does not have the resources to lead on this debate, we could use this infrastructure to support enhanced engagement across the whole area, as required.</p>			
		<p>Finally, we note the 5% suggested for devolved decision making by the community is the same amount as the charging authority can spend on administration of the CIL itself. The requirement is to devolve a “meaningful proportion” of the total CIL amount. Whilst 5% might provide significant local sums of money, we question whether it actually represents a “meaningful proportion” of the total CIL income. We also suggest the sum allocated to communities must <u>be seen</u> to be meaningful – and it will not take cynical residents long to spot the link to the Council’s own admin costs – the PR implications will not be lost! We therefore suggest the Council consider allocating a higher amount to their communities.</p> <p>14b: If the Councils collectively decided to allocate a sum higher than 5% to community influence and decision making, then it would make sense to consider a collective involvement strategy which covered the three districts. Where parish and town councils exist they can provide a conduit for their members participation, but it should be possible to create a mechanism whereby any community member could engage directly with the debate. There is a rise in interest in the perishing of urban areas which may have potential to address this issue – and also be consistent with supporting a wider localism agenda. Apart from acknowledging costs, we have no structure or process to offer at this point in time. Do please note related comments within section 14a.</p>			
CIL070	Cringleford Parish Council	14a: No	All	Noted	No change
CIL071	Long Stratton Parish Council	14a: Yes Agree in principal, as a Parish Council, feel that it is losing out. Percentage is too low.	South Norfolk	Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL074	Taverham Parish Council	14a: Yes 14b: Large urban areas could be parished.	Broadland	Noted	No change
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	14a: Yes 14b: NO - The matter has to be resolved by Norwich City and its residents as it is a real local issue	All	Noted	No change

Question 15:	Do you have any other comments on the Preliminary Draft Charging Schedule(s) or the Community Infrastructure Levy?
Summary of Issues Raised: 72 Yes: 59 No: 13	
<ul style="list-style-type: none"> The majority of comments relate to other questions. This has been highlighted against each of the individual responses and are picked up against the appropriate question. A number of comments also relate to how the CIL funding will be spent rather than the changing schedule itself. 	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL001	Wilkinson Builders	<p>We write in response to the article on the above published in the Eastern Daily Press, dated Tuesday 4th October 2011.</p> <p>As a small property developer ourselves, we would state that in the current economic climate, it is very difficult for developers to make a profit presently.</p> <p>With the new levy proposed to be charged by councils on new developments in and around Norwich, we believe this would make it even more difficult and not make it worthwhile building. We therefore feel we would be forced to stop building new properties.</p>		Noted- see Q1 and issues of overall viability.	
CIL002	Mr E A Newberry	This money must not be used in anyway towards major roads projects as we are trying to discourage car usage where possible	Broadland	Noted- relates to the use of CIL income	No Action
CIL003	CPRE	<p>Thank you for your letter of 28th September 2011 inviting CPRE to comment on the Community Infrastructure Draft Charging Schedule.</p> <p>CPRE Norfolk has consistently opposed what it considers to be excessive housing targets in the GNDP Joint Core Strategy. It is our view that the 33,000 new houses planned for the Norwich Policy Area, many of which will be built on Greenfield sites, will have a severe adverse impact on the countryside surrounding Norwich. Attractive landscapes will be lost, light pollution will increase, rural tranquillity will diminish and traffic congestion will reach Home Counties levels.</p> <p>Of course it is right as a matter of principle for developers to pay for the infrastructure necessary for their estates to be built. But if housing numbers are too high the amount of new infrastructure required becomes excessive and will itself contribute to the suburbanisation of the countryside.</p> <p>We have not filled in the detailed response form but note that it is proposed that the Zone A Levy on residential development, at £135 per square metre, is almost double the Zone B rate (£75). This price differential is likely to encourage developers to build on the more rural Zone B sites first. CPRE would prefer to see incentives put in place that encouraged Brownfield sites that are located within existing development boundaries to be the first to be developed.</p>		Noted- see Q 5a	
CIL005	K J Ewing, Ewing Rentals	<p>I read with interest the article in the Eastern Daily Press on Tuesday 4th October.</p> <p>I am not personally involved with the development, but do act for various small local builders.</p> <p>The level of the levy proposed would be catastrophic for these builders. They are already struggling to sell properties in this present difficult climate and if they were having to find this additional infrastructure levy I truthfully think it would put them out of business.</p> <p>The County can ill afford to lose any new builds in the present climate.</p> <p>I would be interested to know how many new units are being completed at this moment in time compared to, say five years ago. I expect it is a downward trend. This levy would make it far worse.</p>		Noted- see Q1 and issues of overall viability.	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL007	Stratton Strawless Parish Council	We feel that all costs of infrastructure within or associated with a development should be funded by that development. All other infrastructure that is considered necessary for commerce should be funded by those who gain.	Broadland	Noted	No change
CIL008	Hainford Parish Council	On behalf of Hainford Parish Council I am asked to inform you that the response form has not been completed on this occasion as the Council has no comments to make on the details of the Levy although they do have some concerns about the principle.		Noted	No change
CIL009	Stockton Parish Meeting	(I do worry about amount of paperwork involved) <u>Personal view.</u>	South Norfolk	Noted	No change
CIL010	Hempnall Parish Council	<p>Thank you for your letter of 28th September 2011 inviting Hempnall Parish Council to comment on the Community Infrastructure Draft Charging Schedule.</p> <p>Hempnall Parish Council's policy has been to consistently oppose what it considers to be excessive housing targets in the GNDP Joint Core Strategy. It is our view that the 37,000 new houses planned for the GNDP Area, many of which will be built on greenfield sites, will have a severe adverse impact on the countryside surrounding Norwich and throughout South Norfolk & Broadland. Attractive landscapes will be lost, light pollution will increase, rural tranquillity will diminish and traffic congestion will reach Home Counties levels.</p> <p>Of course it is right as a matter of principle for developers to pay for the infrastructure necessary for their estates to be built but if housing numbers are too high the amount of new infrastructure required becomes excessive and will itself contribute to the suburbanisation of the countryside.</p> <p>We have not filled in the detailed response form but note that it is proposed that the Zone A Levy on residential development, at £135 per square metre, is almost double the Zone B rate (£75m2). This price differential could encourage developers to build on the more rural sites first - the Zone B areas are further from Norwich than those in Zone A. Hempnall Parish Council would prefer to see incentives put in place that would encourage Brownfield sites that are located within existing development boundaries to be the first to be developed.</p> <p>If I can be of any further help please do not hesitate to contact me.</p>		Noted- see Q3 re zone boundaries and 5 a re rate of rural levy.	
CIL011	Hevingham Parish Council	Having reviewed the consultation documents I can advise my Parish Council have no comments to make on this and trust this can be noted under Question 15 of the response form		Noted	No change
CIL012	Gary Hayes, Willow Builders	<p>In simple terms I comment as follows:-</p> <p>The levy rates are absolutely ridiculous which if applied to say a site which we are preparing to develop in South Norfolk will make the scheme non-viable.</p> <p>You should be introducing scheme to cultivate and assist the development market because if we don't start to seeing growth in this area soon the uk economy will undoubtedly start the decline into the second dip of recession.</p> <p>The timing of this scheme is probably the worst you could have picked with the property prices on the decline and development of new homes at an all time low are you trying to kill the building industry off completely!</p>		Noted- see Q1 and issues of overall viability although no evidence provided.	
CIL013	Roydon (Diss) Parish Council	Roydon (Diss) Parish Council held an extraordinary meeting on Monday 01.11.11 to discuss the response to the consultation. The literature had been circulated prior to the meeting but the outcome was that they felt it was beyond their remit and unable to make any response		Noted	No change
CIL014	Templemere Residents Association	There is no difference in the needs of local people across those areas you are considering. If development is to be encouraged in order to kick start the economy etc. then charges across the whole GNDP area should be the same and that will also be easier to administer and should not encourage developers to build further out necessitating more road building etc.	All	Noted- see Q3 and residential boundaries.	
CIL015	Sprowston Town Council	In response to the above Sprowston Town Council resolved at their meeting held on 2 November 2011 to support the Community Infrastructure Levy Preliminary Draft Charging Schedule produced by the Greater Norwich Development Partnership for Broadland, Norwich and South Norfolk as detailed in their consultation.		Noted	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL016	Anglian Water	<p>Thank you for the opportunity to comment on this document.</p> <p>I do not have a great deal to say about this document as I would not expect there to be provision within the CIL for water and wastewater infrastructure. We would be pleased to engage in further discussion should wastewater network infrastructure be considered for inclusion.</p> <p>Wastewater infrastructure is currently funded by Anglian Water (by seeking appropriate funding approved by OFWAT) and by developer contribution through the appropriate sections of the Water Industry Act 1991.</p> <p>Please do not hesitate to contact me should you wish to discuss this matter further.</p>		Noted- relates to how CIL funds are spent.	No change
CIL017	Tasburgh Parish Council	<p>Tasburgh Parish Council wish to make the following comments with regard to the Preliminary Draft Charging Schedule Consultation:</p> <p>iii. The Council has noted the consultation but feel that they are unqualified to make a financial decision, however they believe that it is the District Council's responsibility to ensure that they obtain the correct level of contribution from development.</p> <p>iv. In addition there was concern at the term 'meaningful' and that the District Council should be up-front and transparent about the amount that would be passed to Parishes and Communities.</p> <p>I hope this is of benefit in your consultation.</p>		Noted- see Q14.	
CIL019	IE Homes & Property	Given current global economic conditions it is not safe to review CIL charges in 2014/15 as GVA suggest in their Final Report Dec 2010 P73. The review needs to be annual.	All	Noted- but annual review is not likely to be feasible due to the process involved.	No change
CIL020	Postwick with Witton Parish Council	No	Broadland	Noted	No change
CIL021	Kirby Cane & Ellingham Parish Council	<p>The Parish Councillors have discussed this consultation and only have two comments to make, therefore it is very difficult for me to fill in the form.</p> <p>The comments are - that they are not in favour, and should this go ahead a more meaningful proportion should go to the Parish Council.</p>		Noted- relates in part to Q14.	
CIL023	The Theatres Trust	<p>Thank you for your letter of 28 September consulting The Theatres Trust on the CIL draft charging schedules for Broadland, Norwich and South Norfolk councils.</p> <p>The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that <i>'The Theatres Trust exists to promote the better protection of theatres.</i> It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include <i>'development involving any land on which there is a theatre.'</i></p> <p>The Trust recognises the importance of planning obligations to assist theatre owners in becoming more self-reliant and to obtain better buildings by using the planning system and working with the private sector. We are concerned that theatre buildings do not benefit appropriately under the terms of S106 and other agreements, and that it will increasingly be necessary to unlock new sources of funding to help pay for significant improvements to them. Theatres always need improvements to keep pace with public expectations and the needs of performers and producers.</p> <p>The change to S106 obligations will remove their ability to provide funding or the provision of cultural infrastructure. Therefore, if local authorities want to obtain funding for cultural infrastructure they will have to produce a charging schedule and adopt CIL prior to April 2014, effectively making CIL mandatory.</p>		Noted- relates to how CIL funds are spent	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		We are concerned that Section 106 agreements will only be permitted if they are 'directly related' to new developments and will of course be scaled back by 2014, and that from April 2014, a S106 agreement cannot seek contributions for funding or the provision of relevant cultural infrastructure. We hope therefore that the new CIL charging schedule will include provision for arts facilities and advise that currently Arts Council England recommends a standard charge of £149.30 per person in new housing.			
CIL024	Sport England	<p>Thank you for consulting Sport England on the above document.</p> <p>Sport England is the government agency responsible for building the foundations of sporting success, by creating a world-leading community sport environment of clubs, coaches, facilities and volunteers. We want to create a vibrant sporting culture working in partnership with national governing bodies, our national partners, the HE/FE sector, local government and community organisations.</p> <p>Our focus is around three outcomes - growing and sustaining the numbers of people taking part in sport and improving talent development to help more people excel.</p> <p>To achieve this it is essential that inward investment is secured through the planning system to meet the sporting demand of existing and future residents along with known and future needs of sport.</p> <p>Within Sport England's Delivery Plan, ensuring the potential benefits of securing planning contributions are identified as a strategic priority, and as a means of maximising investment into sport.</p> <p>'Sporting and recreational facilities' are included within the definition of CIL infrastructure in the 2008 Planning Act (section 216), therefore Sport England support the Appendix to the draft Charging Schedule for Norwich, as it identifies 'Sport and Play Provision' as a key component of the draft schedule and specifically refers to "outdoor sports pitches, courts and greens, informal recreational open space, equipped and unequipped space for children and teenagers, swimming pools and indoor sports halls".</p> <p>This is a comprehensive definition of the types of indoor and outdoor sports facilities that can benefit from CIL contributions.</p> <p>It is essential however that any draft schedule is under-pinned by a robust evidence base identifying the costs and priorities for new infrastructure provision within the particular policy area. We therefore support the production of the topic paper on 'Green Infrastructure and Recreational Open Space' (June 2011) which sets out how contributions towards outdoor sports provision will be calculated.</p> <p>It is noted that the costs calculated are subject to review and that Sport England's published facility costings are utilised with regard to formal sports provision including grass pitches, tennis courts, bowling greens and multi-use games areas (MUGA's).(Table 2). To this end it should be noted that Sport England's facility costings are also reviewed on a regular basis (usually every quarter) to aid processes such as this.</p> <p>It is not clear however how contributions towards significant indoor community sports facilities (sports halls and swimming pools) will be calculated. Sport England have published facility costings for these facilities also and we would be happy to advise on this element of the schedule if required.</p> <p>Further guidance on integrating sports facilities into CIL documents can be found on the Sport England website via the following link: http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/planning_contributions/community_infrastructure_levy.aspx</p> <p>I hope these comments can be given full consideration in the development of the above guidance, and we look forward to further consultation in due course.</p>		Noted- relates to how CIL funds are spent	No change
CIL025	Norfolk Fire & Rescue Service	<p>Norfolk Fire and Rescue Service would draw attention to the following.</p> <p>Whilst we appreciate and welcome that the CIL enables an initial funding stream to support the development of Infrastructure, there appears to be no provision for the ongoing maintenance of measures put into place once the item(s) have been established and funded. We anticipate that investment in infrastructure would have the consequential effect on raising public revenue streams (business rates, council tax etc) however these may not cover additional costs for the ongoing maintenance of new infrastructure.</p> <p>Good examples of this would be installation of fire hydrants (usually paid for and maintained at the Fire and Rescue Service expense), through to the provision of a fire station. Clearly, these items are at different ends of the cost spectrum for initial capital outlay; however we must raise the matter of 'ongoing' financial impact that the Fire and Rescue Service would incur, and would be expected to find from existing budgets - i.e service regimes and staffing etc.</p> <p>Without detailing the complexities of the Fire and Rescue Service funding formula in this submission, it is fair to say that the ongoing costs (Post CIL) could become disproportionate over time.</p> <p>(Appendix One of the document 'CIL context and background' – specifies the distinction between Section 106 applications i.e fire hydrants and the applicability of CIL items such as Fire stations etc. We welcome the</p>	All	Noted- relates to how CIL funds are spent	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>distinction between the two items but would still reiterate the challenges presented by ongoing funding once Fire and Rescue Service infrastructure is in place).</p> <p>We would welcome a response on how post CIL cost would be covered within the current funding formula?</p> <p>We believe Fire and Rescue Service developments i.e the building of new stations and facilities should not be liable for payment of the levy. The grounds for our position are that we are a non commercial entity providing a community service. As a consequence we believe the levy should be £0 / metre for Fire and Rescue Service structures i.e the approach adopted for community use – our response at 9a & 10a refers.</p> <p>We understand that the analysis for the Joint Core Strategy was conducted by ACOM (formerly EDOR), and that the Fire Service, at that time (circa 2008) had not raised the potential for Fire and Rescue Service accommodation in the GNDP area.</p> <p>However the Service is minded to direct you to our interpretation of community infrastructure. In context we have listed below the areas (in addition to potential new fire station development and land cost), we believe would be in scope for CIL funding from the GNDP:-</p> <ol style="list-style-type: none"> 1.Domestic Sprinkler systems - saving life and property. 2. Commercial sprinkler systems - saving life, property and preventing economic and environmental compromise (i.e loss of industry and jobs in the community). 3. Provision of adequate water supplies for effective fire fighting. 4. Provision of fire fighting appliances. 5. Associated operational IT infrastructure. 6. Personnel recruitment. 7. Training. 8. Personal protective equipment. 9. Increase in community safety initiatives. 10. Increase in technical fire safety costs. <p>We would request that the above items are considered within the costing model used in determining the CIL cost proposals in your consultation. If this is not the case we believe you may wish to reconsider your costing model in view of our comments above.</p>			
CIL026	Marlingford and Colton Parish Council	As a general principle, developments in one area that have deleterious effects on adjoining areas should lead to part of the CIL coming to the affected area. This arises from Marlingford and Colton Parish Councils consideration, for the LDF consultation, of developments in Easton which will undoubtedly lead to increases in traffic through Marlingford and Colton together with increased light and noise pollution, impact on the landscape, impact on wildlife, reduced air quality and increased litter. It is the Parish Councils view that some of the CIL money that would arise from these developments should come to Marlingford and Colton, to be spent at the Parish Councils discretion on infrastructure projects, of which traffic calming could be an example.	South Norfolk	Noted- see Q14.	
CIL027	Horsford Parish Meeting	No	Broadland	Noted	No change
CIL028	Natural England	While we have no specific comments to raise in relation to the content of the charging schedule, we would like to take this opportunity to reiterate the important role that the CIL should play in funding green infrastructure in the Greater Norwich area. The Habitats Regulations Assessment of the Joint Core Strategy concluded that significant additional green infrastructure is required in order to avoid an adverse effect on European designated sites, which are already under demonstrable pressure from recreational disturbance. The provision of an additional 37,500 homes will only exacerbate this pressure. Natural England's <i>Analysis of Accessible Natural Greenspace Provision for Norfolk</i> has drawn attention to the current deficit in green infrastructure provision across the county, and there is a need to serve the new communities as well as improve provision for existing communities. The Community Infrastructure Levy offers an opportunity to secure funding for green infrastructure in advance of development, and – given the identified paucity of provision – it is crucial that this funding is robustly ring-fenced. The monies raised can be shared between the costs of creating new greenspaces, and securing their long term management, and managing existing green infrastructure. Work has been undertaken by the Greater Norwich Development Partnership to analyse the use of existing green infrastructure assets by visitors and local residents, and this will form part of the evidence base for identifying the exact location and typology of new greenspaces.		Noted- relates to how CIL funds are spent	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL030	North Norfolk District Council	<p>I write to advise that North Norfolk District Council has considered the consultation documents, the preliminary draft charging schedules and the proposed boundaries of the two proposed Residential Development Zones and has no substantive comments to make regarding the proposals, except for the following two issues:-</p> <p>1. Lack of any reference to investment in rail infrastructure / facilities within the GNDP area.</p> <p>North Norfolk District Council is disappointed that under the Transportation heading of Appendix 1 of the Background and Context Paper there is no reference to future investment in rail infrastructure and facilities towards which a CIL contribution might be made.</p> <p>The District Council would have a particular interest in any development of new rail facilities or increased service frequency along the Norwich – Sheringham line, particularly the provision of a rail halt at the Broadland Business Park which would increase the accessibility to new employment opportunities by train for people living along the length of the line, including Hoveton, North Walsham, Cromer and Sheringham in the North Norfolk District; as well as improving public transport access into Norwich city centre for a large population from existing areas of housing (Dussindale) and proposed new development in the North-East Triangle.</p> <p>The provision of a rail halt at the Broadland Business Park would be a significant piece of infrastructure and North Norfolk District Council would suggest that it is not clear from the consultation if CIL contributions will be sought in this regard.</p> <p>2. Visitor pressure mitigation measures on European and RAMSAR designated sites as referred to in the Topic Paper: Green Infrastructure and Recreational Open Space.</p> <p>North Norfolk District Council welcomes the proposed inclusion within the GNDP CIL proposals of funds being collected and set aside to support measures which seek to mitigate visitor pressures associated with development in the Greater Norwich area upon European and RAMSAR designated sites. A large number of such sites in Norfolk are within the North Norfolk District eg along the North Norfolk Coast and in the northern Broads, where it might be anticipated that residents of the Greater Norwich area will spend some of their leisure time placing additional pressures on these sensitive natural environments.</p> <p>North Norfolk District Council would therefore welcome the opportunity of discussing further with GNDP partners and the organisations responsible for the management of these designated sites the mechanisms by which CIL contributions from development in the Greater Norwich area, and indeed from new development within North Norfolk, can be collected and spent in an attempt to minimise the impact of increased visitors to such important nature conservation sites.</p>		Noted- relates to how CIL funds are spent	No change
CIL031	Norton Subcourse Parish Council	We cannot understand why change of use and "replacement floor area" sites are exempt from CIL.	South Norfolk	Noted- more a query relating to the CIL regulations	No change
CIL032	Salhouse Parish Council	The Parish Council feels that a subject of this complexity requires a higher level of knowledge and detail on the part of a respondent. The Parish Council would prefer to be asked questions on principle rather than financial specifics.	All	Noted	No change
CIL033	Michael Sida	<p>The Charging Committee: Information/comment in the Draft on the relationship between the Charging Committee and the Local Planning Departments is vague to the point of almost being non-existent. In my opinion It needs to be defined in clear and precise terms. The Draft seems to suggest that there will be one overall charging committee for all of the three districts and made up of Councillors from each district (plus GNDP appointed persons?). Also no mention of where the respective planning departments fit in. If my understanding is correct then there is a vast area for possible manipulation of the policy. For a 'made up' example. The Charging Committee informs the planning departments that the CIL 'kitty' is likely to be a bit short in the next 6 months or whatever so could they be a bit more liberal with their planning consents so as to secure more charges.</p> <p>As an overall comment:</p>	All	Noted- relates to governance issues and scope of CIL regulations	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>Under the heading of 'Governance' (CL14), there are a couple of quotes: – <i>'a presumption in favour of sustainable development'</i>. What is the definition of sustainable development? Is it the same for each area of the country? The same for each district in the county? The same for each town in the district? and so on. In terms of planning approval, the 'riding of a coach and horses' through the current planning system could be seen as being in the context complying with sustainable development. The Draft needs to set out 'its' definition of sustainable development.</p> <p>Also the quote by the Planning Minister (Greg Clark). <i>'Britain urgently needs new homes, new green energy and transport links, and space for businesses to grow. By putting this presumption at the heart of our new framework we will give the planning system a wake up call so the right sort of development, that everyone agrees is needed, gets approval without delay'</i>.</p> <p>In itself a pretty bland and also worrying statement. What is the right sort of development that everyone agrees is needed? Development at any cost or price as long as it produces extra money?</p> <p>On the face of it the CIL seems a good strategy/policy as a means of providing financial contributions to the associated costs of infrastructure etc. However, whether because it is not part of the current brief, (it is a Preliminary Draft), it scantily addresses the issue of any proposed outside monitoring (by non vested interest), on how the system is being operated and controlled and the line of accountability for the decisions taken.</p>			
CIL036	Hale and Heckingham Parish Council	We cannot understand why change of use and "replacement floor area" sites are exempt from CIL - we believe all development should attract CIL.	All	Noted- more a query relating to the CIL regulations	No change
CIL037	Tacolneston Parish Council	I have been asked to inform you that the members of Tacolneston Parish Council do not agree in principle with the implementation of any community infrastructure levy and consider that it would be a pointless exercise to fill in the questionnaire relating to the consultation.		Noted	No change
CIL038	Hugh Ivins	It has been extremely difficult to have meaningful discussions and exchange of views with the GNDP CIL Steering Group and GVA Consultants during their topic meetings	Broadland	Noted - however there have been opportunities for comment through the developer forum and offers of individual meetings.	No change
CIL039	NNTAG	<p>The Norwich and Norfolk Transport Action Group objects to the proposed rates set out in the Charging Schedule for Broadland, Norwich and South Norfolk on the grounds that the amount of Community Infrastructure Levy which the GNDP anticipates raising will be insufficient to pay for essential infrastructure projects in addition to a proposed Norwich Northern Distributor Road, a scheme to which NNTAG objects.</p> <p>The estimated cost of a three quarters NDR between A47 Postwick Interchange and A1067 has risen from £110 million in the Proposed Submission Joint Core Strategy to £157.5 million (a 40% increase). The latter higher figure is as follows:</p> <p>- £112.5 m – cost of a half NDR route (£90.5m Government funding; £4m Growth Point; £22m local authority).</p> <p>- plus £45m cost of NDR extension between A140 and A1067 to be funded by local authority Prudential Borrowing and Community Infrastructure Levy.</p> <p>The GNDP regards a NDR scheme as a Priority One infrastructure project for funding. Its CIL Background and Context report states, "A future CIL examination should not re-open infrastructure planning that has already been submitted in support of a sound core strategy." (3.5)</p> <p>However, the implication is that funding the NDR would absorb a higher proportion of CIL funding in the early phases of development (in region of £50m) which would leave less funding for essential infrastructure. The only solution is to increase the CIL rate for all types of development. We recommend that the CIL rates are increased in the Broadland District council area through which the NDR route would pass.</p>		Noted	No change
CIL042	Blofield Parish Council	Blofield PC withdrew it's original response and asked that it's response be logged as 'no comment'		Noted	No change
CIL043	Norfolk	The Norfolk Biodiversity Partnership (NBP) welcomes this opportunity to comment on the GNDP's draft CIL		Noted- relates to how CIL funds are spent	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	Biodiversity Partnership	<p>charging schedule. We believe that CIL is important and that it has the potential to deliver significant community benefits, if charges are set at an appropriate level and the funds are used wisely, including for the provision of Green Infrastructure (GI).</p> <p>NBP is not in a position to comment in detail on the figures discussed in the draft charging schedule. However, in general terms, we believe the suggested figures are a reasonable balance between the desirability of funding from CIL and the impact on economic viability. We also broadly support the idea of two charging zones for residential development; the suggested boundaries seem reasonable, given the likely locations and scale of proposed development within the GNDP area. We would particularly like to give our support to the idea that Community Uses will not be subject to a CIL charge under the proposals.</p> <p>However, in this context, we would wish to make some comments on how the CIL money will be spent. We strongly believe that a proportion of the funds generated through CIL should be spent on GI and we set out the case for this below.</p> <p>The Case for Biodiversity Actions through CIL: Whilst developers are required to consider protected species and Biodiversity Action Plan habitats and species within the development footprint, they rarely consider the wider effects of the development on biodiversity in the landscape. Increasingly, the lack of a wider perspective on effects on biodiversity from larger developments is being recognised as a significant omission. Developments which result in a significant increase in the size of a town or parish all have the potential to affect habitats and biodiversity adversely in the local area outside the development footprint. These indirect effects may include pollution of air and water, hydrological impacts, disturbance, increased risk of vandalism, fires and fly tipping, unregulated access, ancillary development and operations (such as accessed roads and dredging) and the displacement of individuals and populations of species leading to increased pressure on other sites. These factors may be compounded by the cumulative effects from a number of developments. Climate change may also further increase the significance of such issues.</p> <p>These indirect effects are often poorly addressed in determining planning applications and their significance is often not recognised or acknowledged by decision makers. Nevertheless, such effects may be as harmful to the biodiversity of a locality as direct loss. GI funding through CIL is an important delivery method to address this issue.</p> <p>Potential Green Infrastructure Projects through CIL: To ensure that the existing biodiversity assets are protected for their intrinsic value and for the role they play in ecosystem services and the health and wellbeing of local residents, it will be necessary to increase the resilience of assets in the locality. GI project activities could include, for example, the provision of</p> <ul style="list-style-type: none"> • New alternative areas for public access, to reduce pressure on existing semi-natural habitats; • Buffer habitat adjacent to existing semi-natural habitats and sites; • Infrastructure in the form of fences or ditches to restrict access to sensitive habitats and sites; • New habitats to compensate for the indirect loss from development and the cumulative effects of other proposed and potential development • Restoration and/or improved management of existing semi-natural habitats in the vicinity. <p>These projects will be necessary around all areas of significant developments, including Market Towns and Key Service Centres – not just around the two main growth areas of south-west and north-east Norwich.</p> <p>Policy Background:</p> <ul style="list-style-type: none"> • Planning Policy Statement 9 requires local planning authorities to ensure that development does not result in loss of biodiversity; this principle is also to be included within the NPPF. Although not explicitly stated, this must include the wider indirect and cumulative effects on biodiversity. • Policy 1 of the GNDP's Joint Core Strategy (<i>Addressing climate change and protecting environmental assets</i>) places a strong emphasis on both safeguarding <i>and</i> enhancing biodiversity. The aspirations of this policy require addressing through spatial planning, the development control process and through other delivery methods. In support of this policy, the JCS includes a County-wide Ecological Network Map to help direct action. • Policy ENV5 of the Broadland Local Plan provides additional weight to this. It states, "Particular importance will be attached to...features which provide or contribute to "reserves" or "corridors" for wildlife...". • Section 5.5 of Policy 1 of the Joint Core Strategy states that, "Investment and development will provide a multi-functional network of green spaces and green links, having regard to factors such as accessibility, existing and potential open spaces, natural and semi-natural areas, protection of the water environment, landscape, geodiversity and the fundamental need to contribute to ecological networks". The reference to investment in this policy is obviously crucial. 			

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<ul style="list-style-type: none"> The GNDP has produced a Green Infrastructure Strategy which recognises the importance of biodiversity for its own sake and for the contribution it plays in ecosystem services and the health and wellbeing of local residents. <p>To help meet the aspirations of these policies, it is reasonable and appropriate that there should be a significant Green Infrastructure contribution from CIL.</p>			
CIL044	Water Management Alliance / Broads IDB and Norfolk Rivers IDB	<p>I write on behalf of the Broads (2006) IDB and Norfolk Rivers IDB with regard to the consultation about your proposed Community Infrastructure Levy (CIL) rates. Although I do not have any comments to note regarding the /m2 rates specifically, I would like to make you aware of the following, which may impact on the CIL and/or which "flood prevention and drainage" projects it could, or should, be used to (part-)fund.</p> <p>Internal Drainage Boards, including Norfolk Rivers IDB and Broads (2006) IDB, which cover parts of the three LPA areas affected by this consultation, protect areas of special drainage need, which are theoretically at a high risk of flooding from rivers or tidal inundation. However, the actual risk is substantially reduced by the works that IDBs do, in conjunction with local authorities and other relevant organisations, to ensure that surface water run-off is efficiently drained and eventually discharged to tidal rivers or the sea.</p> <p>The main sources of funding for IDBs' work comes from agricultural drainage rates from landowners within their respective districts, and from the charging of special levies on Councils whose areas coincide with any part of the Board's district. However, other sources of funding can include grant aid from DEFRA or the EA for approved works, and, of particular relevance here, both Norfolk Rivers IDB and the Broads (2006) IDB, as well as most other IDBs, charge developers a Surface Water Development Contribution (SWDC) where the developer proposes to increase the rate or volume of surface water discharging to a watercourse.</p> <p>Without suitable mitigation, increases in the rate or volume of surface water being discharged to a watercourse as a result of development will increase the pressure on existing drainage infrastructure, and are likely to increase the risk of flooding, whether that is to the development site or elsewhere. At the current time, where one of the Boards is prepared to grant consent for an increase in the surface water discharge from a site, this is subject to the payment of a one-off SWDC, which the Boards then allocate to a fund which is used to help finance improvements to the local drainage network to cater for the additional flows. This "he who benefits, pays" scenario ensures that the impact of improvement works on the drainage rates and special levies charged by the Boards is minimised.</p> <p>However, in certain circumstances, it may be appropriate for a more strategic improvement to be undertaken, such as the creation of a new flood storage area, to reduce the pressure on a drainage network, rather than solely improving existing infrastructure. The implementation of schemes like this can reduce flows along a watercourse by storing water "off-line", which then allows additional surface water to be discharged to the drain further downstream, without increasing overall flood risk.</p> <p>I note from your consultation documents and supporting information that the CIL is intended to provide infrastructure to support development of an area rather than to make individual applications acceptable in planning terms, and that your current plans for "Flood prevention and drainage" allow for the funding, or partfunding of "Strategic flood defences where not related to specific development proposals" by the CIL, but that</p> <p>"The establishment and ongoing maintenance of sustainable drainage systems and any other water infrastructure which is not adopted by a licensed water undertaking or other responsible body" will have to be funded through S106 Obligations; S278 of the Highways Act; other legislation or through Planning Condition.</p> <p>In my opinion, some of the items discussed in this letter as having an effect on one of the Boards can fall into the first of these categories, but others fall outside either of them. For instance, the possible creation of flood storage areas would fall into "strategic flood defences where not related to specific development proposals", but as the Boards are "responsible bodies", other improvements to drainage infrastructure maintained by one of the Boards does not fit into either of the listed categories. Therefore, it could be argued that some schemes undertaken by IDBs could potentially be (part-)funded by the CIL, but others would continue to be funded by the Board.</p> <p>Both Broads (2006) IDB and Norfolk Rivers IDB wish to continue charging SWDCs, and using these to help fund improvements to drainage infrastructure. However, obviously neither Board wishes the situation to arise where a developer argues against, or refuses to pay, a SWDC on the grounds that they have already paid for this through the CIL, unless of course, the authorities levying the CIL are going to be passing part of this fee on to the IDBs in respect of the development contribution which would otherwise have been charged.</p> <p>If the Boards do not receive any part of the CIL, but also for any reason lose their ability to charge SWDCs, then the drainage rates and special levies charged by the Boards would have to increase in order to meet the costs of improving drainage infrastructure to cope with additional development, which would mean a higher annual payment having to be made by the Councils contributing to each of these Boards. Without such increases, the Board would be unable to fund required drainage and flood prevention improvements, which would mean the risk of flooding would increase.</p>		Noted- relates to how CIL funds are spent	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		I would be grateful to receive confirmation from you in the near future as to how you envisage the SWDCs charged by IDBs sitting within/alongside the CIL, so that the chance of any future disputes about the payments made by developers towards improvements to drainage networks is minimised, but also so that the Boards' abilities to implement drainage improvement schemes are not compromised. If you wish to discuss this matter further, I would be pleased to meet with you at your convenience.			
CIL046	Wroxham Parish Council	We feel unable to respond by attempting to complete your response form, which mainly asks us to agree to defined charging rates or propose alternatives. We find that the period allocated for this consultation is altogether insufficient to arrive at such a conclusion. It seems to us that viability depends on an understanding of developers' costs and margins and an appreciation of market demand and price sensitivity which only developers can report on, although we accept that their response may be much prejudiced by availability of finance and shareholder pressures. However, we wish to express two areas of deep concern with the proposals: 3. We believe that the demands on local infrastructure will vary considerably according to the location, size and nature of a development in terms of local geography and viability of existing infrastructure prior to the development. Accordingly we are not satisfied that a flat rate over two broad areas and the difference between them has been justified. We believe there needs to be scope to deal with local conditions. Thus, a development in an area where local infrastructure is already adequate and not under pressure makes less demand than one where it is already inadequate and under pressure. 4. We believe that allocation of a fixed and paltry rate of 5% to local town or parish is a failure to recognise the above point or localism policy. If neighbourhoods are to be encouraged to use imagination to create constructive proposals for development with the local support, they must feel able to call on funds to support such development and not see virtually all of diverted to macro projects created by District and County.		Noted- see Q3 and Q14	
CIL047	Beyond Green	Further to the response under Q13, we are sceptical that £750 per residential unit is a realistic assumption for the value of residual S106/278 in determining a viable CIL rate, especially for larger developments. This is because larger developments will typically incur disproportionately greater need for S278 offsite highway improvements, as well as the dedication of land which would otherwise have development value for community infrastructure at potentially no cost.	All	Noted- see Q3	
CIL048	Ashby St Mary Parish Council	<u>Executive Summary</u> 4. The parish of Ashby St Mary has been proposed to be placed in Zone B for the Community Infrastructure Levy. 5. The GVA presentation to the GNDP Developers Forum in May 2011 stated it had used Land Registry data of residential house prices used to determine its zone boundaries. Ashby St Mary parish council (Ashby PC) has gathered its own evidence from Land Registry sources to robustly test the fairness and correctness of this proposal. 6. Ashby PC is satisfied from the weight of evidence it has found, that, based on the adopted test of residential property prices, the boundary between zone A and B should be amended to place Ashby St Mary within zone A. <u>Introduction</u> <ul style="list-style-type: none"> Ashby St. Mary parish council is aware it's neighbouring parish council, Thurton, has made it's own case regarding amending the proposed zoning area in South Norfolk. In respect of the boundary between zones A and B in South Norfolk, it is understood from GVA that the measures used to position that boundary is determined by actual prices achieved rather than notional house prices. Ashby PC has therefore undertaken to seek and test all evidence to determine whether Ashby St. Mary warrants inclusion in zone B as currently proposed by GVA. <u>The NR14 area</u> <ul style="list-style-type: none"> As of the date of this submission the NR14 area contains approximately 22,000 residences and 9,500 occupiers. The NR14 postcode district lies within or includes part of the following towns, counties, localities, electoral wards and stations: Alington, Arminghall, Ashby St Mary, Bixley, Bracon Ash, Bramerton, 		Noted- see Q3 and boundaries of residential charging zones	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>Brooke, Caistor St Edmund, Carleton St Peter, Chedgrave, Chedgrave and Thurton, Claxton, Dunston, East Carleton, Framingham Earl, Framingham Pigot, Gillingham, Haddiscoe, Hales, Hardley, Heckingham, Hellington, Hethel, Holverston, Kirby Bedon, Langley, Loddon, Markshall, Mulbarton, Mundham, Newton Flotman, Norfolk, Norton Subcourse, Norwich, Poringland, Poringland with the Framinghams, Raveningham, Rockland, Rockland St Mary, Sisland, Sprowston East, Stoke Holy Cross, Surlingham, Swainsthorpe, Swardeston, Thorpe Next Haddiscoe, Thorpe-Next-Haddiscoe, Thurlton, Thurton, Trowse, Yelverton.</p> <ul style="list-style-type: none"> Ashby St Mary is situated towards the north eastern edge of the postcode district NR14. NR14 is believed to be one of the largest, if not the largest, NR area of Norfolk in terms of land mass. It is reasonable to conclude therefore, that average property prices taken for the whole NR14 area will contain a huge imbalance of property prices having regard to the size of that area and the infinite types of property within it. The NR14 area contains domestic housing of all ages and constructions, including council-owned property, leasehold and freehold dwellings. The NR14 areas of closely populated, developed centres include Chedgrave, Framingham Earl, Hales, Poringland, Loddon, Mulbarton, Newton Flotman, Stoke Holy Cross and Swardeston where, inevitably, a much greater turnover of property sales have taken place when compared to the rural parish of Ashby St Mary and, indeed, its neighbouring parish of Thurton. It is noted that the zoneA/zone B boundary is currently shown as splitting the NR14 postal district. <p><u>Ashby St Mary</u></p> <ul style="list-style-type: none"> Ashby St Mary is a large widespread parish with no 'centre' that has 123 residences and approximately 250 occupiers. A very high proportion of properties in Ashby, estimated to be 90%, are detached. The majority are older type, freehold dwellings in private ownership. The make-up of the parish is such that the majority of properties are scatter-situated and not built in 'estate' clusters. In the 1990s, 32 houses were built by Bovis on a development comprising two new roads. The most recently built properties in the parish are believed to be two bungalows on Mill Road, Ashby St Mary built approximately ten years ago. <p><u>Evidence providers</u></p> <ul style="list-style-type: none"> To examine whether zone A is correct and fair for Ashby St Mary, Ashby PC has sought evidence of actual property prices of domestic property in its parish including the following internet-based providers as reliable sources for land registry entries and other information to assist in its examination of this subject – Home, Houseladder, Nethouseprices, Ourproperty, Mouseprice, Rightmove, Upmystreet, and Zoopla. <p><u>Property sales evidence in Ashby</u></p> <ul style="list-style-type: none"> From the evidence Ashby PC has found, property sales in the parish unsurprisingly reflect either its older, established, more scattered dwellings or in the steady turnover of the more modern Bovis-built properties in the St Marys Road and Foxglove Close development. With no newly built properties, no such sales evidence exists. In the opinion of Ashby PC, the dearth of new or recently built domestic property in Ashby has resulted in low numbers of annual property sales compared to the average in the rest of the NR14 area. This is hardly surprising given that many places in NR14 contain areas of higher density buildings of proportionally lower values (than Ashby), where turnover is naturally much higher. <p>2011 Ashby sales evidence (Source: Houseladder) £235,000; 229,725; 224,975; 210,000; 212,498; 215,000 (6 properties) Year average = £221,200</p> <p>2010 Ashby sales evidence £290,000; 259,000; 226,500; 330,000; 194,995; 317,000 (6 properties) Year average = £269,582</p> <p>Average 2011 to 2010 = £245,391 (12 properties)</p> <p>2009 Ashby sales evidence £140,000; 210,000; 189,950; 395,000 (4 properties) Year average = £231,237</p> <p>Average 2011 to 2009 = £241,852 (16 properties)</p>			

Respondent id	Respondent Name	Response	Area	Officer Comment	Action																						
		<p>2008 Ashby sales evidence £290,000 Year average = £290,000 Average 2011 to 2008 = £244,684 (17 properties)</p> <p>2007 Ashby sales evidence £297,500; 345,500; 270,000; 152,500 (4 properties) Year average = £213,100 Average 2011 to 2007 = £248,816 (21 properties)</p> <p>2006 Ashby sales evidence £252,990; 360,000; 225,000; 228,000; 247,000; 285,000; 249,995 (7 properties) Year average = £263,997 Average 2011 to 2006 = £252,611 (28 properties)</p> <p>Excluding the incomplete 2011 sales evidence, which in itself reflects the continuing depressed property market conditions, the average sales figure of a property in Ashby for every year between and including 2006 to 2010 is in excess of £240,000.</p> <p><u>Other property price evidence</u></p> <ul style="list-style-type: none"> <u>Average current values – land registry figures</u> (Source: Mouseprice - updated 1st October 2011): <table border="1" data-bbox="596 726 1308 842"> <thead> <tr> <th>Size</th> <th>NR14</th> <th>NR</th> <th>National</th> </tr> </thead> <tbody> <tr> <td>2 bed</td> <td>£169,000</td> <td>£139,900</td> <td>£163,500</td> </tr> <tr> <td>3 bed</td> <td>£205,600</td> <td>£169,600</td> <td>£190,800</td> </tr> <tr> <td>4 bed</td> <td>£287,100</td> <td>£262,800</td> <td>£344,000</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <u>National average property price</u> April – June 2011 (Source: BBC) £179,693 <u>NR average property price</u> (Source: Zoopla.co.uk) £182,148 (1 yr) 181,988 (3 yrs) 185,384 (5 yrs) April – June 2011 (Source: BBC) £198,906 <u>NR14 average property price</u> (Source: Home.co.uk) January 2010 – July 2011 £221,879 All the other property price evidence found (produced above) demonstrates the 2010-2011 average value of property in Ashby St Mary of £245,391, exceeds that of the average for both NR14 and the whole NR postal district. <p><u>Other parishes currently in zone B warranting zone A inclusion</u></p> <ul style="list-style-type: none"> Ashby PC has seen and supports the view expressed by Thurton PC on this aspect and the following is offered as supplementary evidence. Ashby PC contends that there are other higher value areas currently outside zone A, reinforced by average house price sales for neighbouring villages, which warrant inclusion in zone B, such as - <table border="1" data-bbox="596 1356 1338 1419"> <tbody> <tr> <td>Claxton (NR14)</td> <td>£379,300</td> <td>2010 – 09.2011</td> </tr> <tr> <td>Seething (NR15)</td> <td>£247,700</td> <td>2010 – 08.2011</td> </tr> </tbody> </table> <ul style="list-style-type: none"> (Source: Zoopla) Ashby PC notes Bergh Apton is shown largely within zone A but with part of its village also shown in zone B. It finds it difficult to support, and somewhat puzzling, to split a parish into different zones. In the same way, it understands the view of Thurton PC that Thurton and Ashby should be treated as joined up for the process of the zoning boundaries as the boundary between the two parishes divides its single most residentially-developed road where it joins the busy A146. <p><u>Conclusion</u></p> <ul style="list-style-type: none"> Ashby PC considers all its evidence to the GNDD consultation to be directly of relevance to its proposal. It is the weight attributed to that evidence which determines how compelling it is and in the view of Ashby PC the evidence is strong. Ashby PC supports the view submitted by Thurton PC that there is a case for extending the southern boundary for zone A to include Thurton, Claxton, Seething and the remaining area of Bergh Apton, along with Ashby St Mary. Ashby PC recommends this extension be adopted. <p>The conclusion of Ashby PC is that there is ample, compelling evidence to support the view that Ashby warrants being included within zone A. Accordingly Ashby PC requests the boundary of zone A and B be changed to place the parish of Ashby St Mary in zone A.</p>	Size	NR14	NR	National	2 bed	£169,000	£139,900	£163,500	3 bed	£205,600	£169,600	£190,800	4 bed	£287,100	£262,800	£344,000	Claxton (NR14)	£379,300	2010 – 09.2011	Seething (NR15)	£247,700	2010 – 08.2011			
Size	NR14	NR	National																								
2 bed	£169,000	£139,900	£163,500																								
3 bed	£205,600	£169,600	£190,800																								
4 bed	£287,100	£262,800	£344,000																								
Claxton (NR14)	£379,300	2010 – 09.2011																									
Seething (NR15)	£247,700	2010 – 08.2011																									

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL049	Gail Mayhew, on behalf of Thorpe & Felthorpe Trust	<p>Please see below my comments on the proposed CIL Levy.</p> <ol style="list-style-type: none"> 1. While appropriate to ensuring a fair and transparent charging regime that ensures that schemes within an urban area share equally in the cost of collective infrastructure provisions to support growth, the CIL mechanism has a number of fundamental flaws in its application to large scale urban extension. 2. Whereas in an established urban area, sites tend to benefit from existing historic investment in infrastructure (roads, schools etc – even when sites are large scale brownfield or regeneration areas) and key additional infrastructure to unlock growth can be relatively easily identified, quantified and an appropriate tariff set; the opposite is the case in a major urban extension. 3. In the case of an urban extension scheme, typically almost every category of infrastructure needs to be provided within the scheme in order to unlock the site and create an adequate level of amenity. <p>It has also been demonstrated (<i>Valuing Sustainable Urbanism, Savills & The Princes Foundation for the Built Environment 2007</i>) that the delivery of such infrastructure beneficially impacts on land values, however over an extended period.</p> <ol style="list-style-type: none"> 4. A rigid charging and delivery regime such as is anticipated by the GNDP has insufficient flexibility in terms of phasing, procurement and delivery to support the delivery of the infrastructure required within a major urban extension. 5. Area of Benefit / Hypothecation <p>The CIL mechanism, as anticipated by the GNDP, effectively severs the link between land/property taxation and 'area of benefit' and will allow the delivery body absolute authority to prioritise the delivery of infrastructure across the wider charging area.</p> <p>This regime should not apply to the delivery of complex development scenarios such as the North east Growth Triangle which have a sufficiently intensive infrastructure requirement as to require the hypothecation of revenues raised within the local area to the local infrastructure requirement.</p> <p>A locally operated CIL could potentially be a workable mechanism, on the other hand.</p> <p>This would require genuinely strategic unlocking infrastructure projects, such as for example an intensification of the Bittern Line Rail Service; an intensification of the Norwich-Cambridge Link; major new green infrastructure for city-wide benefit to be charged through another mechanism – potentially a Tax Increment Finance measure which might apply to investment as well as to development property.</p> <ol style="list-style-type: none"> 6. The CIL mechanism anticipates placing infrastructure delivery in the hands of the charging/delivery body. This raises questions around value for money procurement, phasing and alternative funding models. <p>Value for Money</p> <p>Public procurement routes do not necessarily produce the most cost effective provision of a given piece of infrastructure. This raises the question of whether the role of the charging/ delivery authority should be to procure infrastructure or to monitor its delivery, potentially by commercial land / property /infrastructure interests.</p> <p>Phasing</p> <p>There may be a conflict between the delivery authority's views on the phasing of infrastructure (particularly a body covering a wide geographical area) as compared with that of land developer or locally based delivery agency or partnership. Whereas within a single urban extension, careful infrastructure phasing will closely ally the infrastructure investment to the creation of land value/amenity and the unlocking of the development on a phased basis; across a wide geographic area where very large strategic infrastructure projects are planned for, the prioritisation may be driven by other imperatives and may become politicised.</p> <p>Account also has to be taken for demand and value to be created within a site, such that a given piece of infrastructure becomes viable. Sometimes an incremental approach to the provision of such</p>		Noted- principally relates to how CIL funds are spent and queries relating to the CIL regulations	No change

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>infrastructure can be adopted, eg co-occupation of flexible buildings by different community uses prior to the construction of bespoke buildings. Flexibility should be built in to charging and delivery practise to support this.</p> <p>Alternative Public Sector Funding Models The lack of flexibility of the CIL makes it incapable of embracing alternative funding models that are rapidly emerging in many areas of the public and private sectors. For example, in education, DFE is forging a rapidly moving agenda on alternative funding models for schools – this needs to be taken account of. Equally, as new delivery mechanisms are being forged for a range of social services, flexibility should be maintained to respond to this changing environment.</p> <p>Contribution in Kind In some cases developers may wish to provide certain elements of infrastructure as part of the value creation in their own scheme. CIL does not provide a mechanism for recognising private sector delivery of elements of infrastructure – this should be addressed.</p> <p>Equally the CIL makes no provision for reimbursing nor recognising the contribution of land that services the infrastructure provision eg. to accommodate public uses, parkland. This should be addressed.</p> <p>New Residential Funding Models Within the property industry, strategic residential development practice is rapidly evolving. The government has been keen to support the emergence of the rented property sector; equally there is increasing evidence of investment activity in strategic land, with the potential for the emergence of investment backed strategic land vehicles with an appetite for the delivery of fully serviced sites. The CIL mechanism potentially will operate to inhibit the emergence of these new approaches unless sufficient flexibility is built in.</p> <p>Risk Management / Driving Efficiencies While there is a need to embrace growth in order to restart the economy, it must also be recognised that it may take many years for the property market to re-establish high levels of demand, sufficient to pay for major strategic infrastructure. In such a climate, efficiencies in delivery and the optimisation of historic and current infrastructure spend should be to the fore to enable development to progress. This argues for:</p> <ol style="list-style-type: none"> Utilising existing infrastructure as far as is possible (infrastructure efficiency) Optimising the use of land that is already served by infrastructure (landuse efficiency) Considering minimum additional infrastructure requirement to unlock sites and phasing this carefully to produce added land value; (capital efficiency) Maintaining local control over additional infrastructure requirement such that prioritisation can be influenced; Prioritising infrastructure and land use patterns that minimise trip generation, vehicle miles travelled and encourage modal shift. (energy efficiency) Reducing carbon emissions, and optimising other resources. <p>In conclusion, while the GNDP CIL may be an appropriate charging mechanism to capture value across a range of diverse and relatively small scale sites, the points made above argue that it has the potential to undermine effective delivery of large scale urban extension.</p> <p>Instead, for such urban extension scenarios, a local charging mechanism to underpin the delivery of collective infrastructure within the scheme should be put in place, with much higher levels of flexibility to encourage and allow for alternative funding mechanisms to emerge.</p>			
CIL050	Dickleburgh and Rushall Parish Council	No		Noted	No change
CIL051	Spixworth Parish Council	This Parish Council (in the Broadland District Council area) considered this consultation at a recent meeting and concluded that “any charge on developers would eventually be passed on to buyers, and this would drive up the price of housing. It was AGREED to respond that the rate proposed (£135-160 per m ²) was too high.”		Noted- see Q4a	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		It had no other comments to offer on the consultation.			
CIL052	Cecil Ball, Town Planning Intelligence on behalf of Zurich	<p>GVA Grimley's Tariff Viability Study states the following:-</p> <p><i>"In light of the viability difficulties facing all new development at the present time, including the stringent performance and risk reduction requirements from funders, landowners are likely to be reluctant to sell for a price that reflects a significant discount to that which would otherwise apply. If the pressures on developments costs remain as a result of policy initiatives such as improved energy efficiency and carbon reduction and there is no premium sale value to be achieved that offsets the costs, then eventually landowners should come to accept that development values have permanently and significantly been reduced. In this instance they are unlikely to benefit simply by withholding land from the development market. Such a change in attitude or acceptance of a new level of land value is likely to take some years to occur."</i></p> <p>Such a change in attitude or acceptance of a new level of land value is likely to take some years to occur. Therein lies the rub.</p> <p>GVA Grimley's recommendation is to adopt a CIL Tariff based on normal conditions given the time gap between their report of 2010 and likely implementation of the tariff, which they describe as "several years". However, the Greater Norwich Development Partnership's timetable envisages adoption of the CIL Charging Schedules by Summer 2012. We do not expect market conditions to be "normal" by then. There is still widespread uncertainty about the direction of both the national and global economies. "Normal" conditions may take a considerable time to establish and they may well be quite different from what has been regarded as "normal" in the past.</p> <p>None of the consultation or supporting documents make clear whether developers will be contributing more or less to strategic infrastructure under the proposed CIL tariffs than under the current section 106 regime. Informal enquiries with South Norfolk District Council suggest that the proposed tariffs will significantly increase total contributions.</p> <p>GRA Grimley's report notes that:- <i>"For both residential and commercial development the market remains fragile and subject to volatility as a result of the economic recession affecting demand."</i></p> <p>According to the Land Registry's House Price Index, national house prices fell during the period September 2010 to September 2011 by 2.6%. The only region to experience a rise was London. Prices in Norfolk fell by 3.1%.</p> <p>This is not a good time to be introducing a new tax. One of GVA Grimley's main recommendations is raising CIL's profile to improve confidence in the system. We view this as absolutely essential.</p> <p>We have suggested in answers to earlier questions that initial tariffs should be set quite low to finance an infrastructure programme firmly focussed on the top of the priorities list. A lower than expected rate will help boost confidence and help start a virtuous upward circle in activity and returns. Once that is in place, it will become easier to raise rates and bring projects further down the list into the programme.</p> <p>The property market is complex and perhaps undergoing fundamental shifts in the way it works and in demand for its products. Bearing this in mind, it seems essential to us that the administration, setting, monitoring and review of CIL Tariffs is carried out by people with expert knowledge and understanding of the market. GVA Grimley's report looks at a number of options for CIL tariff governance. We strongly support the report's suggestion of establishing an external delivery vehicle model, with subsidiary Special Purpose Vehicles for each of the infrastructure projects undertaken.</p>	All	Noted- see Q1 and overall viability	
CIL053	Diss Town Council	No		Noted	No change
CIL054	Aylsham Town Council	Given that this is such a new area of the planning process, the consultation seems very rushed, and is in advance of the government consultation closing date. As part of this consultation, town and parish councils have had to accept figures put forward and the gap in funding as advised at the meeting organised by the Norfolk Association of Local Councils.	Broadland	Noted- timescales meet requirements. The government consultation does not affect the consultation on the charging schedule.	No change
CIL055	Stephen Heard, on	The JCS is not sound. Housing viability continues to deteriorate and therefore assumptions for growth and rising house prices are flawed. This paper changes the basis on which the Councils justified the viability to	All	Noted- see Q6a and Q14	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
	behalf of Stop Norwich Urbanisation	<p>the Planning Inspectors. The levels of charging cannot therefore be justified.</p> <p>There is inadequate accountability for the disbursement of these sums of money. The paltry level of 5% to local councils is a travesty of any ideas of Localism. The introduction of a Garage Tax is unjustified.</p> <p>The proposals for future changes to the CIL regulations in the future to fund affordable housing is disgraceful. That is not infrastructure.</p>			
CIL056	Thomas Egger LLP, on behalf of Asda Stores Limited	<p>We act for Asda Stores Limited, who have asked us to make representations on their behalf in respect of the draft Charging Schedules prepared by the Greater Norwich Development Partnership on behalf of Norwich City Council, Broadland District Council and South Norfolk Council.</p> <p>As the Charging Schedules proposed are the same for all three councils (albeit with some variations between areas within the combined districts of the three councils) we will confine representations to a single set of comments on the collective effect of the three Charging Schedules. This is consistent with the approach of the councils, which has been to achieve a universal charging schedule amongst the three districts.</p> <p>We wish to object fundamentally to the approach taken to assessing the Charging Schedules, and to the disproportionate loading of the Community Infrastructure Levy upon two limited classes of development: retail uses, especially large convenience goods based supermarkets and superstores of 2000 square metres gross or more, and additionally (although of less direct concern to our client) residential development.</p> <p>The stated purpose of the Community Infrastructure Levy is to raise revenue for infrastructure necessary to serve development. The rationalisation for the imposition of the Community Infrastructure Levy was that insufficient monies were being raised through the planning process to fund the infrastructure necessary to provide for the needs of development authorised by planning permissions. While revenue has historically been raised by Section 106 Agreements (and Section 52 Agreements before those) the revenue collected, it was argued, has been raised disproportionately from a limited number and class of developments, and the majority of (minor) developments that escaped the requirements to enter into a Section 106 Agreement were either effectively subsidised by larger developments, or were allowed to proceed, and individually and cumulatively contributed to infrastructure requirements, without being required to pay for them. The Community Infrastructure Levy was intended to remedy that imbalance.</p> <p>Against that background, we do not think it an unreasonable approach to seek a Community Infrastructure Schedule calculated on a district-wide (or, as here, three districts-wide), assessment of infrastructure needs, with the estimated total cost being divided between the total estimated or planned development anticipated for a district (or three districts). That would at least have been a fair and potentially proportionate approach to the issue of raising the Community Infrastructure Levy and fixing the Charging Schedules. It is noteworthy that this is the approach that has already been adopted by some of the authorities who have already had their Charging Schedules approved.</p> <p>Instead, the Charging Schedules proposed for the three districts exhibit a fundamental disconnect between the Community Infrastructure Levy charges proposed: many of these prepared by your consultants, GVA. However the principle work undertaken by GVA appears to be simply to assess each segment of the development as a potential 'cash cow' and source of revenue, without carrying out any, or any meaningful, exercise to assess the infrastructure likely to arise from any particular class of development.</p> <p>In this connection, it is worth taking a moment to consider the contribution made by the retail sector as a whole to the economy of the UK. The retail sector is one of the most dynamic and innovative sectors within the UK economy. It is also one of the largest employers and largest creator of new jobs at the present time. Asda Stores Limited have a proven track record of investing in and on the edge of town centres and other existing centres, and of creating jobs within these. Their stores regularly rejuvenate and regenerate existing centres, and of creating jobs within these. Their stores regularly draw new shoppers to them, which benefits the existing retailers, and those who open stores in Asda-anchored centres in their wake. Across the UK, while some superstores individually necessitate the provision of specific local infrastructure, the proliferation of large modern supermarkets can be argued to have reduced infrastructure requirements by lessening the travel distances necessary for people to undertake their bulk food shopping. Put shortly, it is frequently the case that journey times fall as new supermarkets are opened.</p>		Noted- see Q7 and issues relating to the CIL regulations	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>Nowhere in the GVA supporting papers is there any acknowledgement of this phenomenon, nor indeed any meaningful assessment of the role of large supermarkets within the national economy, beyond a very crude assessment that they have the capacity to pay potentially very large sums of Community Infrastructure Levy.</p> <p>In this connection, we are extremely concerned by the suggestion put forward by GVA as part of the background papers and justification to the three local authorities preparing these Charging Schedules that a generic superstore developed by an operator would be capable of paying CIL upto £1,500.00 per square metre. This would be a total of nearly £9,750,000.00 for the 6,500 square metre typical superstore which they consider. This level of contribution is wholly unrealistic and would threaten the ability of operators to make the investment the economy needs.</p> <p>Even at the Community Infrastructure Levy figure proposed in the Charging Schedules of £135.00 per square metre, the proposed Charging Schedules would add £877,500.00 to the cost of GVA's generic supermarket development. Nowhere in the GVA paper is there any suggestion that this is necessarily the appropriate figure in terms of the related costs that a supermarket development is expected to carry. They have concerned themselves only with their (superficial – as they themselves acknowledge) calculations of assumed ability to pay.</p> <p>Given that there is a risk that, at least for an interim period, local authorities will still seek site-specific commitments also under the Section 106 regime this represents an un-reasonable double whammy of loading costs onto a very limited category of development.</p> <p>Although these representations are not made on behalf of any house builder in particular, or the housing industry in general, we note that a similar approach had been adopted to commercial house building. While our clients are mainly concerned with the impact on retail developments, this is still a matter of legitimate concern to our clients, who are involved in many mixed use town and district centre schemes. The viability of many of these will be prejudiced. Again, very high rates of Community Infrastructure Levy are proposed, and these, if adopted will have the effect of reducing the supply of housing within the three districts involved. All other things being equal, if you increase the cost of providing a product, either the supply of it will fall, or the price will rise, reducing demand.</p> <p>Adding up to £16,000 to the cost of a 100 square metre house at a time when the Government is seeking to improve the affordability and supply of housing seems perverse to say the least.</p> <p>Similarly, providing a major disincentive and additional cost to investment in major supermarkets at a time when government policy (as to which see the ministerial statement 'Planning for Growth' and the draft National Planning Policy Framework issued on 25 July 2011) is to achieve greater investment in the economy and greater job creation is completely inappropriate.</p> <p>The charges proposed to be levied on large supermarkets (£135 per square metre) and on house building (£135 - £160 per square metre) appear even more disproportionate when one looks at the remainder of the Charging Schedule where all other forms of development save smaller retail units (£25.00 per square metre) are to be charged at a blanket rate of a relatively nominal £5.00 per square metre.</p> <p>If these Charging Schedules are adopted, there will inevitably be two consequences across the three districts adopting them: firstly, all other forms of development will receive a massive subsidy at the expense of commercial house building and the construction of large supermarkets; and secondly, there will be a corresponding disincentive (and market distortion accordingly) to investment in those two sectors of the economy.</p> <p>It is trite economics that ideally taxes should distort the market as little as possible, and allow consumer and market preferences to be expressed in the most natural way as possible to optimum market solutions. This is every bit as true as in the market for land and the use of land as in all other aspects of the economy. The proposed Charging Schedules being promoted by the Greater Norwich Development Partnership fly in the face of the fundamental principle of taxation. If these Charging Schedules are implemented, they will distort the local market across the three districts; and they will provide a huge disincentive to house building at a time when the Government is trying to encourage this; and to investment in large retailing, a significant job creator, at a time when the Government is trying to encourage the creation of additional employment across the economy.</p>			

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>Additionally, it should be noted that within the three district economy, over the planned period, there is likely to be a very limited number of large format retail stores built. Consequently, reducing the levy proposed per square metre on this floorspace would not result in a proportionate increase in the levy required on other forms of commercial or other development. However, applying this levy would run the risk of diminishing substantially the number of such stores built, with a consequential loss of employment opportunities, regeneration, and investment in town and district centres.</p> <p>A much fairer solution, accepting for the purpose of this argument that the Community Infrastructure Levy is necessary for funding district-wide infrastructure, would be to divide the council's estimate of total infrastructure costs over the charging period (and in this connection, it is important to remember the Government's guidance as recorded in the National Planning Policy Framework is that deliverable infrastructure should be included) by the total expected development floorspace and apply a flat rate levy across the district and across all forms of development. That will have the least possible adverse effect upon the market for land and for development, and yet the greatest possible opportunity for the economy to prosper and thrive, and for jobs to be created.</p> <p>For all these reasons, we would ask that the Greater Norwich Development Partnership and its constituent local authorities undertake a fundamental rethink of their position, and substantially alter their charging schedules in so far as they relate to retail development in general, and large format retailing in particular.</p>			
CIL057	Norfolk Rural Community Council	<p>We would ask that CIL guidance be provided, in a plain English format, which provided community members with a clear and transparent account of how the CIL is to be operated. Points to be clearly stated would include:</p> <ul style="list-style-type: none"> a) how the LIPP is developed, how it is reviewed, how communities might influence the inclusion of local infrastructure projects (the third priority type projects), etc. b) clear guidance on funding decision making (allocation of funding, selection amongst equal priorities, etc) c) who the decision makers are in each case <p>A general comment on prioritisation. Prioritisation needs to take into account the necessity to deliver sustainable development not simply growth. The effect on community cohesion, diversity, current and future services all need to be factors.</p> <p>We appreciate the point about prioritising on at what stage the infrastructure is needed – but communities may lack confidence that this meant 100% of infrastructure would be delivered over the period. Experience of s106 is by the time we get to priority 3 items, the money has gone</p>	Broadland	Noted- relates to business planning and governance	No change
CIL058	Alan Richard Williams, on behalf of Stop Norwich	<p>This document makes a number of very good proposals to fund infrastructure. The basic premise is regrettably flawed and we would express great concern that normal processes of government are being modified without providing adequate monitoring or safeguards against potential problems.</p>	All	Noted	No changes
CIL059	Environment Agency	<p>Thank you for inviting us to comment on the above consultation document. We understand that the final charging schedule will lead to the production of a 'Regulation 123 List' under CIL Regulations which will set out the specific infrastructure to be funded/part funded by CIL. We would welcome the opportunity to provide input, particularly into the production of the 'Regulation 123 list', but also into any future review of the LIPP. We note that appendix 1 of the 'Background and Context' consultation document includes an indication of the categories of infrastructure currently intended to be funded/part funded by CIL. We support the inclusion of the following general infrastructure types: green infrastructure, waste recycling, renewable energy, flood prevention and drainage, and utilities.</p> <p><u>Flood prevention and surface water drainage</u></p> <p>It appears that there may be an expectation that future flood defences are likely to be fully funded through the Environment Agency. It should be noted that this may not necessarily be the case and further/additional sources of funding may be required. In particular, it should be noted that we are unable to fund defences specifically required for future development proposals. There may be flood defence/prevention schemes with the potential to be CIL funded/part funded. This is currently subject to discussion internally. We would welcome further discussion on any potential schemes when you begin to draft your Regulation 123 list/review your LIPP.</p>		Noted- relates to how CIL funds are spent	No changes

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>Information on Environment Agency Anglian Region flood risk and coastal management schemes that have confirmed funding in 2011/12 and indicative funding up to 2015/16 has been placed on our web site - see web link below. http://www.environment-agency.gov.uk/research/planning/118129.aspx</p> <p>You may wish to discuss the issue of surface water drainage infrastructure with the relevant officer at the Lead Local Flood Authority. We are aware that there is a draft Surface Water Management Plan (SWMP) for the Norwich area. The SWMP recommends that a number of actions are required to manage surface water within Norwich more effectively. These can be found within appendix D. The SWMP suggests that its findings should be a source of evidence for future infrastructure planning and reviews of the LIPP. We therefore recommend that the outputs of the SWMP are considered when planning future infrastructure.</p> <p><u>Wastewater/water infrastructure</u></p> <p>We recommend that discussions with the Water Company continue to determine where water infrastructure is required and the appropriate funding mechanism for that infrastructure.</p> <p><u>Green Infrastructure</u></p> <p>We are supportive of all forms of green infrastructure particularly as they can often provide multiple benefits such as habitat creation, water quality improvements, surface water drainage etc.</p> <p>Further, we draw your attention to Regulation 17 of the Water Environment (WFD)(E&W) Regulations 2003 which places a duty on each public body, including local planning authorities, to 'have regard to' river basin management plans (RBMP). Indeed, we note that it has already been highlighted within the LIPP that development must support the Anglian RBMP actions to protect/improve water quality. We therefore recommend that you consider whether WFD improvements can be achieved through the provision of green infrastructure. At this time, it is difficult to provide further guidance on this matter. However, as more information becomes available we would be happy to participate in further discussions through the drafting, or reviews, of your Reg123 list or through reviews of your LIPP.</p> <p>We hope that our comments are helpful to you. We look forward to future discussions with you on this matter.</p>			
CIL060	Eaton and University Community Forum	<p>We write on behalf of our client, Sainsbury's Supermarkets Ltd, in respect of the draft CIL Charging Schedules for Broadland, Norwich and South Norfolk.</p> <p>Sainsbury's currently operates three stores in the Joint Core Strategy Area at:</p> <ul style="list-style-type: none"> • Pound Lane, Norwich (Broadland District Council); • Longwater Retail Park, Costessey (South Norfolk District Council); and • Queens Road, Norwich (Norwich City Council). <p>Sainsbury's are also interested in pursuing future opportunities to enhance their retail offer in the Joint Core Strategy area.</p> <p>The implementation of CIL in the Joint Core Strategy Area and its impact on retail proposals is therefore of great interest to Sainsbury's and they are keen to ensure that the CIL levy is implemented appropriately.</p> <p>Having reviewed each of the draft Charging Schedules, we are of the firm view that the proposed levy of £135 per m² on convenience stores over 2,000m² is both unreasonable and unjustifiable. It will simply be too onerous to developers and operators to pay this levy in respect of foodstore development in addition to having to pay considerable Section 106 contributions. The levy means that these types of development will need to contribute at least £270,000, but more than likely, a minimum fee of £500,000 will be required for a standard new foodstore.</p> <p>From a review of the evidence base, it is clear that the figure of £135 per m² has not been robustly assessed in any way, particularly in terms of the potential impacts on the economic viability of development. This is a requirement of Section 14 of the CIL Regulations and, therefore, the levy as proposed is not appropriate or reasonable. It is completely unreasonable to base the figure on the general assumption that retail development can afford to make a bigger contribution than other types of development in terms of viability.</p> <p>Furthermore, in light of the Government's clear promotion of sustainable economic development, the imposition of this levy will conflict with key national policy aims. One of the key messages from 'Planning for Growth' is that LPA's should "ensure that they do not impose unnecessary burdens on development".</p> <p>The imposition of the proposed levy rate will be a clear burden on retail development and it will be harmful to</p>		Noted- see Q7	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>investment and job creation. PPS4 identifies retail as economic development and development that generates employment. In the current economic climate, retail development is an important contributor to economic growth and obstacles such as the proposed levy should not be imposed. It will be in clear conflict with current national policy and should not be carried forward, as proposed.</p> <p>If a levy must be brought forward, we consider that a cap needs to be set for the total amount of money that can be contributed by developments through CIL. This cap should be based on a robust assessment of viability, taking into account that developers will still also be contributing significant funds towards Section 106 Agreements. It is unreasonable that the proposed CIL Levy effectively acts as restriction on the size of development that is allowed by being such a fundamental factor in the overall viability of the development. This is too restrictive and unjustified, especially in the current economic climate.</p> <p>Finally, we would highlight the need for the next draft version of the document to include a list of specific infrastructure requirements which CIL will contribute towards. This list is fundamental to understanding the need for CIL contributions and the impact of any individual scheme on these infrastructure requirements. The document cannot come forward without this list.</p> <p>We trust that the above comments will be taken into consideration in the preparation of the next draft of the Charging Schedules. Sainsbury's are keen to invest further within the Joint Core Strategy area, but do not wish to see potential development opportunities adversely impacted upon by the imposition of an unreasonable CIL Levy.</p> <p>Please contact my colleague Helen McManus or myself if you wish to discuss further and please keep us informed of the LDF process going forward.</p>			
CIL062	Ciara Arundel & Melys Pritchett (Savills L&P), in conjunction with Norfolk Homes and Endurance Estates, on behalf of Easton Landowners Consortium	<p>We agree with the principle of CIL as a transparent method of filling the infrastructure funding gap but it has to be set at a level which will enable development going forward to fulfil the GNDP housing requirements and provide affordable housing at the required 33% where possible.</p> <p>We have studied the five year land supply and plotted the proposed development sites on the CIL Charging Zone Map. From this exercise, we have found that all the development land over the next five years is within Zone A. Of this only two sit outside the former Inner Area as allocated by GVA. Whilst we have not assessed each one individually, from our knowledge of Norwich, we can see that the vast majority are brownfield sites, thus requiring some form of demolition and/or remediation. This puts a maximum of 63.97 hectares (3,636 units) at risk from the viability miscalculation. Assuming 33% affordable housing, this amounts, potentially, to the loss of 1,200 affordable units over the next five years.</p> <p>The viability approach by GVA is so flawed that, even where there is potential for sites to come forward at the proposed level of CIL/Tariff, it is very unlikely that there will be any "surplus" in the development to provide anywhere near the required level of affordable homes. If CIL/Tariff is set but Section 106 obligations are still subject to viability arguments, then affordable housing is the most obvious casualty.</p> <p>CIL will be used to fund infrastructure required to enable development across the GNDP area. Due to the phasing of development, this infrastructure has to be forward funded by the charging authorities. If the proposed charging schedule is adopted, there is a clear and significant risk that much of the envisaged development will simply not come forward. The charging authorities are therefore at great risk of incurring huge debt with no guaranteed way of servicing it.</p> <p>It needs to be understood that even if house prices do rise to 2007 peaks or beyond, the development world is a very different place now. The Code for Sustainable Homes, general rising build costs, reduction in labour pools, the reluctance of land owners to sell, the significantly low level of transactions, the lack of finance and the cost of finance are all factors which both commercial and residential developers have to contend with. The CIL/Tariff is a reasonable way in which to fund infrastructure but it would be inequitable for it to be set at a level which reflects an economy and development world of four years ago and then be set to rise on an index linked basis.</p> <p>We understand that this exercise is about viability in this area and, therefore, comparisons with other charging authorities are difficult. However from those CIL/Tariffs that have been set, the GNDP area appears high other than when compared with LB Wandsworth, even those which are closer to London and therefore benefit from much higher land and property values.</p>	All	Noted- see Q1 and Q4a	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
CIL063	Andrew Leeder, on behalf of The Leeder Family	No comment at this stage		Noted	No changes
CIL064	English Heritage	<p>Thank you for consulting English Heritage on the draft charging schedules for the Community Infrastructure Levy in the Greater Norwich area.</p> <p>The Core Strategy for Greater Norwich allocates considerable growth in the coming years, and we understand that this is a critical moment in terms of defining the infrastructure that should be provided to support it.</p> <p>English Heritage does not wish to make any comments on the level at which the CIL charge is set. We would, however, like consideration to be given to the definition of infrastructure, and how historic assets may be considered in this context. Where development proposals come forward for sites that contain historic assets, or there are effects on the setting, or viability, of such designations resulting from a development, it may be suitable to propose that CIL funding is used to mitigate such effects. This situation should clearly not justify granting permission where heritage impacts were in themselves unacceptable; however, there could be instances where repair and re-use of a heritage asset to serve a new community was appropriate. In such a case, defining the heritage asset as infrastructure would seem entirely suitable. In other circumstances, the use of CIL to fund public realm works in historic areas might be a suitable response.</p> <p>We are also concerned regarding the potential for CIL to impact on the exceptional cases where enabling development is allowed with the express purpose of achieving a heritage goal. As you will be aware, enabling development is development that would not normally be permitted but, exceptionally, if the heritage asset has little chance of being viable without the economic gain from nearby development, it is occasionally justified. An example might be where housing development is permitted in the park of a country house defined as 'at risk' in order to restore the historic building. If the introduction of CIL would result in an increase in the amount of development required, it could be instrumental in increasing the damage to the setting of such an asset, and compromise the balance of harm and benefit.</p> <p>We would be pleased to discuss any of the issues raised by the introduction of CIL further, if that would be helpful.</p>		Noted- relates to how CIL funds are spent	No change
CIL065	Old Catton Parish Council	<p>I am sorry that most sections are blank. My Council did not feel able to comment on those parts but does feel strongly about the local implications of making funds available for recreation.</p> <p>Consideration should also be given to the sustainability of projects funded by CIL</p>		Noted- relates to how CIL funds are spent	No change
CIL066	Mr A B Walker	Don't forget money for walkers & cyclist paths		Noted- relates to how CIL funds are spent	No change
CIL067	Redenhall with Harleston Town Council	<p>Redenhall with Harleston Town Council has a useful briefing on the intended Community Infrastructure Levy (CIL) by Carole Baker from South Norfolk Council's Planning Department at our October meeting. Following this we have given consideration to the consultation documents.</p> <p>We feel unable to contradict the various charging schedules being proposed as these have received careful consideration by the professional officers at the three local authorities concerned and we lack their experience, expertise and background knowledge. We have no objections to the two charging zones suggested.</p> <p>We welcome proposals that "a meaningful proportion of CIL" be allocated to the neighbourhood where the development is likely to take place. Without additional information as to the actual sums of money likely to be received by our council over the coming years, we doubt that these contributions will trigger major infrastructure projects in our town (e.g. a new community hall). Projects seem likely to be confined to minor activities such as additional allotments, play or gym equipment and small town centre enhancement schemes. We are intending to respond to central government's consultation on these matters. An additional area of concern with regards to the distribution of CIL is where developments may be agreed close to parish boundaries. This could mean that a new development built on that edge of a parish boundary may look to</p>		Noted- see Q14	

Respondent id	Respondent Name	Response	Area	Officer Comment	Action
		<p>one parish as its service centre, however, a separate parish may benefit from the CIL.</p> <p>We thank you for the opportunity to respond to these consultation and we hope our comments will be useful.</p>			
CIL068	Bunwell Parish Council	We think the team has done a good job in putting up these rates for public consultation and appreciate the thought which has gone into their compilation. However, we would like to see the special needs of the rural areas and hope that what we have said above will be very seriously considered and acted upon – at the very least in Bunwell itself and hopefully across the whole area.	All	Noted	No change
CIL069	Broadland Community Partnership	<p>We would ask that CIL guidance be provided, in a plain English format, which provided community members with a clear and transparent account of how the CIL is to be operated. Points to be clearly stated would include:</p> <ul style="list-style-type: none"> d) how the LIPP is developed, how it is reviewed, how communities might influence the inclusion of local infrastructure projects (the third priority type projects), etc. e) clear guidance on funding decision making (allocation of funding, selection amongst equal priorities, etc) f) who the decision makers are in each case <p>A general comment on prioritisation. Prioritisation needs to take into account the necessity to deliver sustainable development not simply growth. The effect on community cohesion, diversity, current and future services all need to be factors.</p> <p>We appreciate the point about prioritising on at what stage the infrastructure is needed – but communities may lack confidence that this meant 100% of infrastructure would be delivered over the period. Experience of s106 is by the time we get to priority 3 items, the money has gone.</p>	Broadland	Noted- relates to governance and how CIL funds are spent	No change
CIL070	Cringleford Parish Council	More explanation needs to be made on Priority 3 infrastructure what projects are currently on this list? What is priority 3?	All	Noted- relates to how CIL funds are spent	No change
CIL073	Mr R A Harris	Having studied this letter, I am in agreement that these charges should be made and would be pleased to have further information on the next stage and, if possible, a copy of the Draft Charging Schedule Publication in January 2012.		Noted	No change
CIL074	Taverham Parish Council	No	Broadland	Noted	No change
CIL075	Brundall Parish Council	Having regard to the proposed housing development in Brundall over the plan period 2011 to 2026, the Parish Council would expect the CIL generated locally to be spent on improved recreation provision appropriate to a village with a current population of 4000 people		Noted- relates to how CIL funds are spent	No change
CIL076	Graham Tuddenham, United Business & Leisure Ltd & Landowners Group	<p>Compared with other Charging Schedules emerging there is disparity possibly through differing expectations of different charging authorities. There is clear evidence of uncertainty in the methodology used in arriving at the rates proposed. There is clear evidence that the charging rate proposed will not necessarily deliver the infrastructure provisions set out in the LIPP.</p> <p>The provision facilities and infrastructure being provided cannot be limited to occupiers of the new residential dwellings who are in effect being directly charged therefore the need exists to discount the charges to reflect usage by those who are not contributing.</p>	All	Noted	No change
CIL077	Aslacton Parish Council	<p>The Parish Council has considered this and has concluded that the information respecting the distribution of the levy and the conditions under which it would be released are insufficient to for them to make any meaningful assessment of the proposal.</p> <p>Proportionately what would be allocated to Norfolk County Council, South Norfolk District Council, Parish Council, Norfolk Police as a precepting authority.</p>		Noted- relates to how CIL funds are spent	No change