

**Community Infrastructure Levy Regulations 2011.
Preliminary Draft Charging Schedule Consultation.**

Response - dated 8 November 2011

Evidence

Please use this section to give us any comments you have on the evidence:

- The explanatory document ‘Community Infrastructure Levy: Background and Context’
- Viability Advice on a CIL/ Tariff for Broadland, Norwich and South Norfolk (GVA, December 2010)
- Charging Zones Schedule Report (GVA, August 2011)
- Topic Paper: Green Infrastructure and Recreational Open Space (GNDP, June 2011)

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?

Yes No

Please add any comments below
In the main, but see answers to questions below.

My answer applies to (please tick one or more of the boxes):

Broadland Norwich South Norfolk All

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Geographical zones

Please use this section to give us any comments about the boundaries of the geographical charging zones shown in appendix 1 of the Preliminary Draft Charging Schedule

Non-residential development zone boundary

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?

Yes No

Please add any comments below

My answer applies to: (please mark one or more of the boxes):

Broadland Norwich South Norfolk All

Residential development zone boundaries

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?

Yes No

Please add any comments below

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.

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My answer applies to: (please mark one or more of the boxes):

Broadland	<input type="checkbox"/>	South Norfolk	<input type="checkbox"/>	All	<input checked="" type="checkbox"/>
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Charging Schedule

Please use this section to comment on the rates of charge as shown in the table on page 2 of the Preliminary Draft Charging Schedule

Residential development – Zone A

Question 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?

As it is.

Question 4b: What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland Norwich South Norfolk All

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Residential development – Zone B:

Question 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?

Yes No

Please add any comments below

Please see my answer to question 3 above. That is to establish an Inner & Outer B

Question 5b: If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

Increase in charge income because as it is closer to the 'smoke'

My answer applies to (please tick one or more of the boxes):

Broadland Norwich South Norfolk All

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Residential development – zones A and B

Question 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?

No change

Question 6b: What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland

Norwich

South
Norfolk

All

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Large convenience goods based supermarkets and supermarkets

Question 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?

Yes No

Please add any comments below

Question 7b: If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

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Other retail and assembly and leisure developments

Question 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?

Yes No

Please add any comments below

Question 8b: If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland Norwich South Norfolk All

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Community uses

Question 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?

Yes No

Please add any comments below
Not for commercially run care homes

Question 9b: If you answered no to the above question:

What should the charge be?

What is your justification for this rate?
If run as a commercial enterprise a charge should be levied..

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Other types of development

Question 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?

Yes No

Please add any comments below

Question 10b: If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland Norwich South Norfolk All

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There are other issues we would like your views on, though these are not part of the Preliminary Draft Charging Schedules.

Discretionary relief

The approach to discretionary relief can be found on page 3 of the Preliminary Draft Charging Schedule and in section 12 of the 'Community Infrastructure Levy: Background and Context'.

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

Yes No

Please add any comments below

My answer applies to (please mark one or more of the boxes):

Broadland Norwich South Norfolk All

Staging of payments

The approach to the staging of payments can be found in page 3 of the Preliminary Draft Charging Schedule and in section 11 and appendix 4 of the document 'Community Infrastructure Levy: Background and Context'.

Question 12: Do you have any comments about the draft policy

Yes No

Please add any comments below

My answer applies to: (please mark one or more of the boxes):

Broadland Norwich South Norfolk All

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Payment in kind

Within the GNDP area, where land is required within a development to provide built infrastructure to support that development (such as a school) it will be expected that land transfer will be at no cost to the local authorities and will not be accepted as a CIL payment in kind. Where the facility is needed to serve more than one development, any land transfer over and above that needed for the specific development would be regarded as payment in kind of CIL. The approach to payment in kind can be found on page 3 of the Preliminary draft charging schedule and in section 12 of the document 'Community Infrastructure Levy: Background and Context'.

Question 13: Do you agree with the approach to payment in kind?

Yes No

Please add any comments below

At the current market price.

My answer applies to: (please mark one or more of the boxes):

Broadland Norwich South Norfolk All

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Neighbourhoods and CIL

The Government proposes that neighbourhoods where development takes place will receive a 'meaningful proportion' of CIL revenue to spend on infrastructure projects locally. The local community will be able to decide how this money should be spent as long as it is used for infrastructure.

The government is currently consulting on this proposal which can be found its website at www.dclg.gov.uk.

The consultation suggests that in Broadland and South Norfolk districts the Parish and Town Councils will take on this responsibility. In Norwich, where there are no Parish or Town councils, an approach appropriate to the area will need to be developed.

Question 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?

Yes No

Please add any comments below

My answer applies to: (please mark one or more of the boxes):

Broadland Norwich South Norfolk All

Question 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?

Please add any comments below

No.

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Other comments

Question 15: Do you have any other comments on the Preliminary Draft Charging Schedule(s) or the Community Infrastructure Levy?

Yes No

Please add any comments below

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.

As an overall comment:

Under the heading of 'Governance' (CL14), there are a couple of quotes:

– *'a presumption in favour of sustainable development'*. 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.

Also the quote by the Planning Minister (Greg Clark). *'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'*.

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?

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.

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My answer applies to: (please mark one or more of the boxes):

Broadland Norwich South Norfolk All

For paper copies of this form please email cil@gndp.org.uk or telephone 01603 430144

Please return the form to:

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PO Box 3466
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NR7 0NX

OFFICE USE ONLY:

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Forms can also be delivered by hand to:

to your local district council office or to the County Council:

- Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Norwich NR7 0DU
- Norwich City Council, City Hall, St Peter's Street, Norwich, NR2 1NH
- South Norfolk Council, South Norfolk House, Swan Lane, Long Stratton, NR15 2XE

ALL FORMS MUST BE RECEIVED BY 5PM ON MONDAY 14 NOVEMBER 2011

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