

The preparation of the Community Infrastructure Levy is a public process and your full representation will be made public for this purpose.	For office use only:
	Date received: 16 FEB 2012
	Rep no: DCS 001

# Greater Norwich Development Partnership

## Community Infrastructure Levy Draft Charging Schedules for Broadland, Norwich and South Norfolk

### Representations Form

Please return to:

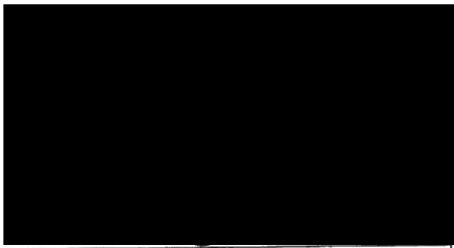


By email: cil@gndp.org.uk  
By post: Greater Norwich Development Partnership  
PO Box 3466  
Norwich  
NR7 0DU

**All comments must be received by 5pm on Monday 5 March 2012**

**Please read the Statement of Representations Procedure and Guidance Notes before you complete this form.**

#### 1. Personal details:

*\*If an agent is appointed, please complete only the Title and Name boxes in column 1 below, but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>
First name	<input type="text" value="Christopher"/>
Last name	<input type="text" value="Erwin"/>
Job title	<input type="text" value="Parish Councillor"/>
Organisation	<input type="text" value="Loddon PC"/>
Address	
Postcode	
Telephone no.	
Email address	<input type="text"/>

#### 2. Agents details (if applicable)

<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>

**Q1.** Do you consider the Council(s) has followed a correct approach in developing the Draft Charging Schedule as required by the Community Infrastructure Levy Regulations 2010 (as amended)?

Yes  No

**I would like my representation to be considered for (please tick all that apply):**

Broadland District Council's Draft Charging Schedule.....

Norwich City Council's Draft Charging Schedule.....

South Norfolk Council's Draft Charging Schedule.....

If no:

a. Did you raise this issue at the Preliminary Draft Charging Schedule Consultation Stage?

Yes  No

b. Please give details of what change(s) you consider are necessary, having regard to the legal requirements for a charging schedule and, if not raised previously, why not. You will need to say why you think this change will make the Draft Charging Schedule legally compliant. It will be very helpful if you could also put forward your suggested revised wording of any text. Please note your comment should briefly cover all the information, evidence and supporting information necessary to support or justify the representation and the suggested change as, after this stage, further submissions will only be possible at the request of the examiner, based on the matters and issues he/she identifies for examination. Please be as precise as possible. Only information that relates to the representation will be accepted.

*Please add your comments here*

*See separate sheet*

**Q2.** Please state in the table below which part of the Draft Charging Schedule(s) you have further comment on.

**I would like my representation to be considered for (please tick):**

Broadland District Council's Draft Charging Schedule.....

Norwich City Council's Draft Charging Schedule.....

South Norfolk Council's Draft Charging Schedule..... **XXXX**

Paragraph e.g. 1.1	Comment
<i>Please enter the paragraph number here</i>	<i>Please enter your comment here</i>
	See separate sheet

**Supporting documents**

You can support your comment with documents. Please refer to the guidance notes if you wish to submit documents. Please list any documents that you are sending to support your comment.

*Please add your comments here*

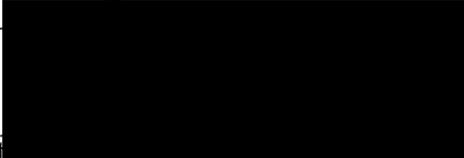
**Notification requests**

In line with the Statement of Representations procedure, please indicate if you wish to be:

XX heard by the Examiner

- notified that the Draft Charging Schedule has been submitted to the Examiner in accordance with Section 212 of the Planning Act 2008
- notified of the publication of the recommendations of the Examiner and the reasons for those recommendations
- notified of the approval of the Charging Schedule by the Charging Authority(s)

**Signature:**

Signature:		Date:	13/2/12
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NB: A signature is not required if you are completing this form electronically

Please email to [cil@gndp.org.uk](mailto:cil@gndp.org.uk) or post to Greater Norwich Development Partnership, PO Box 3466, Norwich, NR7 0DU

*See attachments please.*

## **GNDP CIL Regulations 2019 amended.**

### **Representation.**

#### **Q1(b)**

##### **1. Evidence from Grimley –(to establish that their document is flawed in general)**

Grimley are well known consultants in this field. However, this document falls below the standards I would expect.

- They also act for a numbers of builders, including one with a major local development. This is a conflict of interest, as the Councils need the maximum practicable CIL to fund alterations to the built environment needed to cope with the increased local population from developments, and the interest of developers is to minimise the CIL to increase their profits. My former employers until I retired (a large Actuarial firm) and their competitors would include a substantial statement in such a case about how they handle conflicts. The absence of such a statement (anyway I can't see it in the published documents) has to raise doubts whether the CIL is at the maximum practical level, particularly in the outer zone.
- Relying on private statistics is not acceptable for a document relating to public sector policies- it is not transparent. They should have relied on public data.
- Ten years is too long a period for data, due to the changes in the economy. Similarly assuming an improved economy has no current basis for justification. For example, half of houses bought in this period were financed by the interbank market, which is now dead (permanent!), with other forms of financing, not applicable to house buying, having taken its place.
- They admit themselves there is limited sales evidence available. In such circumstances, they should warn their report is statistically flawed. For example, in order to obtain a meaningful normal distribution curve of evidence, over 1,000 relevant observations are needed, which is unlikely in some of the towns they use to draw conclusions. Additionally, the "fat tails" of the top and bottom 5% of observations must be excluded as statistically misleading, and they show no evidence they have done this.
- They have not looked at evidence from Waveney, so have no idea if they are creating a cheap filling to the sandwich between Norwich and Beccles/Bungay, which will inevitable result in an over concentration of development, and builders' profits will be higher (county boundaries being irrelevant to housing development.)

#### **Conclusion to §1.**

- (i) **The report looks quantitatively authoritative, but is not. It is statistically slightly informed guesswork.**
- (ii) **It does not stand up to rigorous evidence based analysis**

## **2. Grimley's lack of local knowledge, and its effect on analysis of the A146 Norwich travel to work corridor**

In addition, Grimley do not look as if they have sought local knowledge throughout the geographically large County of Norfolk, looking at their very small list of companies they have consulted.

- They have identified the M11 Corridor, because that is obvious to anyone driving to Norwich along the A11.
- Their analysis has not been thorough enough to identify other anomalies in the outer zone.
- They seem to have only examined Diss and Harlesden in South Norfolk, which are both towns with sufficient local employment to be distinct from the Norwich travel to work area.
- They then seem to have drawn a neat looking line to delineate inner from outer zone, without examining evidence to the East.
- As a result of this they have failed to identify that the villages along the A 146, as far as Hales, are to a large extent travel to work in Norwich for employment, and retirement, often from more expensive areas in the South, so have higher house prices than the rest of the non A11 outer zone.

### **Conclusion to §2.**

- (i) Specifically, the report fails to identify the Norwich travel to work area of the A146 villages, which should, like the A11 corridor, be in the inner zone, with a higher charge.**
- (ii) As a conclusion to the above, the villages of Thurton, Loddon, and Hales should be included in the inner zone.**

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### **3. Changes to SNC CIL Draft Charging Schedule.**

**§4, Charging Schedule Residential Zone A.** Nothing has happened to the economic scenario since £130 was originally proposed. Whilst developers will be delighted the charge has been reduced, it is not in the interest of either SNDC or the Parish Councils. The key drivers to development will be availability of finance for both builders and prospective house buyers.

***The Charge for zone A should be £130, not reduced to £115.***

As §10.1, to restate your own principle: "it will be important to ensure that the level of CIL should be maximised." This should apply from the start.

§11.2 The Charging Schedule, as I have shown has not been informed well by local evidence in general- flawed statistical techniques and insufficient recent data as I have shown- and it has not been informed at all about the A146 Norwich travel to work area.

***This paragraph is not needed, and should be excluded.***

§ Maps.

Map 2 and Map 5 should be amended to put Thurton, Loddon, Chedgrave, and Hales in the higher charging area. The symmetry of the map demonstrates local factors, such as travel times to Norwich and fast bus services have not been taken into account. As the A11 corridor, an A146 corridor should be shown.