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

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:

2. Agents details (if applicable)

* 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		Mr
First name	Paul	John
	Timesuall	
Last name	Timewell	Long
Job title		Planning Associate
Organisation	Timewell Properties Ltd	Bidwells (Timewell Properties)
-		
Address		16 Upper King Street
Postcode		NR3 1HA
Tolophono no		01603 229411
Telephone no.		01603 229411
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Draft Charging Schedules for Broadland, Norwich and South Norfolk: Representations Form and Guidance Notes

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

Timewell Properties Ltd has concerns over the impact the proposed CIL charge of \pounds 115 sqm. could have on small to medium scale residential development proposals within Zone A (Norwich and its immediate surrounds, including Little Melton).

This represents a charge of \pounds 10,200 for an average sized house (89 sqm.), additional to the s106 cost needed to mitigate the direct impact of the development for such things as access and open space etc. This is more than would normally be anticipated to be charged through the previous section 106 planning obligations regime for most small to medium scale developments.

Given the depressed state of house prices at the moment and the foreseeable future, and the expectation that material costs, finance costs etc. will be increasing, this charge has a significant impact on land values and therefore the viability of schemes.

Timewell Properties Ltd are not convinced that the GNDP can properly demonstrate with the information it has, that the proposed CIL rate would not put at serious risk the viability of development proposals across the Greater Norwich Area (particularly the Inner Area (Zone A)).

Timewell Properties Ltd is aware of the problems that have been raised by the development industry on the evidence used by GNDP to support the CIL figure, particularly the original GVA report and its assumptions on values and costs etc. Timewell Properties Ltd is not convinced that any of the recent work undertaken by the GNDP has adequately addressed the concerns.

The current evidence base is still questioned and in light of this, Timewell Properties Ltd considers that the GNDP cannot robustly demonstrate residential scheme viability across Zone A at the rate proposed.

Until it does so, the CIL rates cannot be considered to be based on robust and credible evidence and should not be approved.

The GNDP needs to put forward further robust and convincing evidence that the proposed CIL rate for residential development in the Inner Area (Zone A) results in viable schemes.

The GNDP needs to re-run its testing scenarios with correct assumptions as suggested by others in the development industry. If the re-runs cannot justify the proposed CIL rate, then it needs to be reduced to a level that does demonstrate development viability across Zone A.

The GNDP also needs to issue a statement/provide evidence confirming that where there are issues of viability caused by CIL, that Councils will accept a reduced affordable housing figure, and state what the figure can reasonably be reduced to and still receive Council support.

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......

Paragraph e.g. 1.1	Comment
Please enter the paragraph number here	Please enter your comment here

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:

- 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: 5 March 2012

NB: A signature is not required on forms returned electronically

Please email to <u>cil@gndp.org.uk</u> or post to Greater Norwich Development Partnership, PO Box 3466, Norwich, NR7 0DU