

Draft Charging Schedules for Broadland, Norwich and South Norfolk:
Representations Form and Guidance Notes

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

**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	
Last name	Knowles	
Job title		
Organisation	Building Partnerships	
Address	Queens House, Queens Road, Norwich	
Postcode	NR1 3PL	
Telephone no.	01603 664665	

Email
address

pknowles@buildingpartnerships.co.uk

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** **Unknown**

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

We did not make a formal representation to the previous CIL consultation stages preferring to make our comments informally.

We generally support the proposal to create a CIL for the Norwich Area as a method that can simplify delivery of development. There are, however, a number of issues that are critical to the successful application of the CIL that need to be reviewed:-

- 1) The GNDP need to provide certainty for developers that the demarcation between CIL and S106 will not change. As far as possible all costs should be transferred to CIL with the exception of Affordable Housing (AH). A list of issues covered by S106 should include all state schools and the Councils should commit to no alteration of the split once CIL is implemented.*
- 2) All developments will need certainty that once CIL is paid the infrastructure relating to the development will be delivered when it is required. We would suggest that guidelines and a programme of delivery are consulted on with developers that can then be implemented on every planning permission granted.*
- 3) We note that there are 2 charging zones for residential development and a single zone for commercial. We consider that this is the correct approach. Facilities are provided in Norwich, as the regional capital, that are used or are for the benefit of the entire hinterland and a 2 zone approach reflect the*

fact that the further from Norwich the less the impact.

- 4) *There has been universal discontent from developers at the Charging levels proposed. The viability assessment is based on assumptions that are viewed as being too optimistic. There should be a review of the level of CIL over a longer period than proposed, possibly within each of the first 5 years from the date of adoption of CIL, to consider and agree with developers, what interim measures need to be put in place to ensure that the level of CIL does not restrict development. This will require the ability to review the level of CIL, if considered appropriate, to stimulate development so that it is relevant to market conditions at any relevant time.*
- 5) *The level of CIL should take account of accepted practice in the development industry. There should be a review of sites where the impact of Guaranteed Minimum Price levels historically agreed means that development is halted due to the level of CIL.*
- 6) *We consider that the payment time frames should be over a 5 year period rather than 2 years as currently proposed and increased proportionately for smaller sites.*
- 7) *We support the level of CIL proposed for commercial properties as being at a realistic level.*

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

Paragraph e.g. 1.1	Comment
<i>Please enter the paragraph number here</i>	<i>Please enter your comment here</i>
2.1	Planning permission should be defined as the expiry of the Judicial Review Period on any detailed planning permission and the expiry of the Judicial Review Period for the last reserved matters on an outline planning permission. For large residential or commercial schemes where outline planning is obtained followed by detailed consent on each phase or each building it should be the implemented detailed consent on the relevant phase or building.
2.2	For planning permission for mixed use development there are different timescales for implementation and payment should be triggered separately on the commencement of the residential and commercial elements.
4.0	The reference to 'All other types of development ...' should specify the Use Classes covered (ie B1, B2, B8 etc).
5.1	Reference to '(at the Date of Planning Permission) should refer to expiry of the Judicial Review Period (see 2.1 above) or, more properly, relate to building cost index from the date of the commencement of development.

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.

<p><i>Please add your comments here</i></p> <p>None</p>
--

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

Draft Charging Schedules for Broadland, Norwich and South Norfolk:
Representations Form and Guidance Notes

- 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:
------------	-------

NB: A signature is not required on forms returned electronically

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