



Greater Norwich Development Partnership
PO Box 3466
Norwich
NR7 7NX

Monday 5 March 2012

Dear Sirs,

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

First name

Last name

Job title

Organisation

Address

Postcode

Telephone no.

Email address

2. Agents details (if applicable)

Mr

Paul

Clarke

Regional Office Partner

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Norwich, Norfolk

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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

The Norfolk Chamber of Commerce supports the principle of CIL, and suggests that if set properly can be a strong tool in securing and co-ordinating the funding of infrastructure to support and encourage growth. However, the converse is also true. If the CIL rate is set to high for certain types of development in certain areas, then it could have the opposite affect and act as a throttle on growth.

The Chamber is broadly content with the CIL rates for, institutional uses (C2, C2A and D1, including emergency services buildings) – nil charge, and the 'other types of development covered by CIL regulations - £5 sqm..

With regard to the proposed £25 sqm charge for small shops, many of the Chambers members are concerned that in the current economic conditions, they will find it difficult to take on these costs in marginal trading units.

The Chamber of Commerce has concerns over the impact the proposed CIL charge of £115 sqm. could have on the prospects for residential development proposals within Zone A (Norwich and its immediate surrounds).

Residential development is a key driver of growth nationally, not just locally. Most of Greater Norwich's growth will be in Norwich and surrounding settlements (Zone A) and therefore subject to the £115 sqm. charge. This represents a charge of £10,200 for an average sized house (89 sqm.), added to this will



be additional costs such as access costs, open space etc. In itself, residential development brings immediate jobs through construction but also secondary jobs that support the surrounding local economy. In addition, we need to ensure that the right houses are built in the most appropriate locations to encourage/stimulate local growth.

Given the state of housing market at the moment and the foreseeable future, and the expectation that material costs, finance costs etc. will be increasing, this charge could have a significant impact on the viability of residential schemes.

The Chamber is yet to be convinced that the GNPD can adequately demonstrate 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)).

The Chamber has been made aware of the concerns raised by the development industry about the evidence used to support the CIL figure.. It appears that the current evidence base is still being questioned by the development industry and the recent evidence published by GNPD does not appear to address all of the concerns.

The Chamber is therefore concerned that the GNPD cannot at the moment robustly demonstrate residential scheme viability particularly across Zone A at the rate proposed (£115 sqm.). Until it is able to do so, the CIL rate in Zone A cannot be considered to be based on robust and credible evidence.

The GNPD 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. This means re-running and testing viability using the credible assumptions suggested by the development industry.

If the re-testing, based on the development industry's figures cannot demonstrate viability across Zone A at the current proposed rate (£115), which appears likely, then it needs to be reduced to a level that does demonstrate development viability across Zone A.

To conclude, the Chamber remains committed to encouraging growth to occur within the Greater Norwich area. Whilst endorsing CIL as a principle, they remain concerned that the currently proposed charging levels are set at an unrealistic level. Until either the current rates can be justified to the satisfaction of the development industry, or the CIL is reduced to an affordable development that helps stimulate growth rather than stifle it, the Chamber cannot support the draft charging schedule, particularly as it relates to residential development in Zone A.

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
<i>Please enter the paragraph number here</i>	<i>Please enter your comment here</i>

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.

<i>Please add your comments here</i>

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



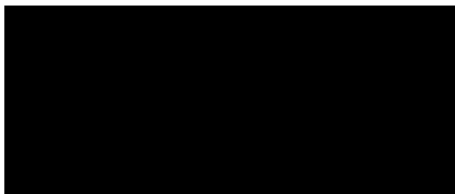
**Norfolk
Chamber of
Commerce**
The Ultimate Business Network

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-  GREAT YARMOUTH
-  WEST NORFOLK
-  THETFORD

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- ✓ 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)

Yours faithfully



Paul Clarke
Bidwells
**For and on behalf of
Norfolk Chamber Planning & Development Group**