



Suffolk Coastal District Council

Community Infrastructure Levy - Draft Charging Schedule

The Community Infrastructure Levy Draft Charging Schedule is subject to public consultation from **Monday 6th October until Monday 17th November 2014**.

The Council invites comments on the details contained within the consultation document; those making representations are encouraged to do so by using this form.

Representations made on the Draft Charging Schedule during the representation period will be considered by the Council prior to submission for independent examination.

The independent examiner will be checking:

- Whether the charging authority (Suffolk Coastal District Council) has complied with the required procedures set out in the Planning Act 2008 and the CIL Regulations 2010 (as amended).
- Whether the Draft Charging Schedule is supported by appropriate available evidence,
- Whether the proposed rates are informed by and consistent with the evidence on economic viability across the charging authority's area.
- Whether the proposed rates would put at serious risk the overall development of the area.

Contact Details:

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Organisation (if applicable)	Evolution Town Planning LLP on behalf of Bentwaters Parks Ltd and Bentwaters Business Park Ltd
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Q1: Do you consider that the Council has adequately identified a funding gap using appropriate infrastructure evidence?

Please continue on a separate sheet if necessary

Q2: In setting the CIL rates, do you consider that the Council's economic viability assessment has used appropriate available evidence? If you disagree please provide evidence.

Please continue on a separate sheet if necessary

Q3: In setting the CIL rates, do you consider that the rates proposed represent the appropriate balance between the desirability of funding infrastructure and the need to maintain overall viability of growth across the District?

Please see accompanying report ref. E197/8.C1.CILrep01

Please continue on a separate sheet if necessary

Q4: Do you consider the boundaries for the different charging zones to be appropriate? If you disagree please provide evidence.

Please continue on a separate sheet if necessary

Q5: Do you have any other comments on the Draft Charging Schedule or any of the associated documents or evidence base documents?

Please continue on a separate sheet if necessary

Anyone making representations on the Draft Charging Schedule has a right to be heard by the examiner in a public hearing. If you wish to exercise this right please indicate it by ticking the relevant box below.

Yes	I wish to be heard at the public hearing by the examiner
Yes	I wish to be notified that the Draft Charging Schedule has been submitted for examination
Yes	I wish to be notified of the publication of the report of recommendations of the examiner
Yes	I wish to be notified of approval of the Charging Schedule by Suffolk Coastal District Council.

Thank you for your comments.

Please return this form to:

Planning Policy and Delivery Team
Suffolk Coastal District Council
Melton Hill
Woodbridge
Suffolk
IP12 1AU

Or alternatively via email to suffolkcoastallocalplan@eastsoffolk.gov.uk before the consultation closes on **Monday 17th November at 17.00.**

Data Protection Statement: The information you have supplied may be processed by computer or form the basis of manual records. Suffolk Coastal District Council will only use the data you have provided for purposes relevant to the preparation of the Local Plan or the Community Infrastructure Levy.

If you do not wish to receive further updates relating to the Local Plan for Suffolk Coastal, please tick here

**Representations on the Community
Infrastructure Levy draft Charging Schedule
Consultation on Behalf of Bentwaters Parks
Ltd and Bentwaters Business Park Ltd**

November 2014



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**Representations on the Community Infrastructure Levy draft Charging
Schedule Consultation on Behalf of Bentwaters Parks Ltd and
Bentwaters Business Park Ltd**

Reference: E197/8.C1.CILrep01

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1.0 Introduction

- 1.1 These representations are made on behalf of Bentwaters Parks Ltd and Bentwaters Business Park Ltd; co-owners of the Bentwaters former airbase in Rendlesham. They answer Question 3 of the Community Infrastructure Levy draft Charging Schedule representation form. Bentwaters is identified on the attached plan in Appendix 1.
- 1.2 This site has planning permission for a wide range of employment related uses across some 140,000 square metres of floor space across a 380 hectare landscaped site.
- 1.3 These representations are made with the aim of ensuring that the District Council understand that the rural employment sites must remain fit for purpose¹ and serve the need of business and the community.

2.0 Site Description and Rationale

- 2.1 Bentwaters is a former USAF airfield closed to military use in 1993 and formed the technical/airfield element of the former airbase with the residential element now formed of the village of Rendlesham which continues to grow in population.
- 2.2 The military legacy has left a large number of buildings of various types suiting a mixture of employment related uses with a mix of purpose built office units to warehousing and industrial units (former hangars and aviation workshops) and storage compounds.
- 2.3 The Bentwaters site currently provides for over 400 jobs² and offers some 140,000 square metres of consented employment related floor space, comprehensive site infrastructure including sustainable access to the neighbouring village and open, landscaped environments.
- 2.4 The following extracts are taken from the Haven Gateway Employment Land Study 2009 and set out the importance of this site (and similar rural employment sites) to the economy of the District:

3.72 The rural employment sites have a strong manufacturing and 'food stuffs' element, built on the agricultural past of the region. [...] Agents consider that these units will continue to prosper, but as they tend to have

¹ Para3.125 of the Haven Gateway Employment Land Review 2009

some owner / occupier element, any growth will be in close proximity to the original site or on land already owned by the occupier, rather than through moving to a new location.

SUFFOLK COASTAL CENTRAL

3.122 Suffolk Coastal Central comprises predominantly rural employment sites, half of which are based on former airfields.

3.123 The three former airfields include mainly distribution and warehouse uses. Most of the building stock is low quality former airfield and military buildings. Rents are relatively cheap due primarily to the low grade buildings, lack of amenities, perceived poor environment and poor access.

3.124 From site visits undertaken as part of the ELR it is noted that former airfields are popular business locations, including predominantly indigenous business uses. No specific sectoral concentrations or specialisms were noted on the sites, although there are a number of distribution companies maximising the space and nature of buildings (and low rental values) on numerous across the area.

3.125 The scale of activity on the former airfields, with very limited vacancy observed, including both 'non dirty' and 'dirty' uses with limited external impact, is considered to be strong.

There are also clear indigenous business advantages to the continued use of these sites for employment purposes (B1, B2, B8) including ensuring that required investment (e.g. light touch public realm and building repairs) ensure that the sites are 'fit for purpose' whilst also maintaining low rental values.

- 2.5 The importance of the Bentwaters site (located on the Suffolk Lorry Route Network) for the local economy is supported by the Haven Gateway study. It has become a commercial and agricultural hub responding to local need and providing a location for indigenous businesses.
- 2.6 There are no other comparable alternative locations for these extant indigenous

² Updated Planning Statement for C/10/3239 Feb 2014

businesses, it is the principle employment site in the 'Suffolk Coastal Central' zone (see Appendix 2).

- 2.7 Further reinforcing this point because the wealth of businesses located at Bentwaters have no other comparable sites available to them in the locality their prosperity is inextricably linked to that location.
- 2.8 The key to the ongoing economic success of this site in the future is flexibility and cost effectiveness for businesses and this is recognised in the Haven Gateway Study.

3.0 Response to Question 3

Q3: In setting the CIL rates, do you consider that the rates proposed represent the appropriate balance between the desirability of funding infrastructure and the need to maintain overall viability of growth across the District?

- 3.1 The CIL rates set out in the draft charging schedule that are relevant to this site come under the category 'all other uses'.
- 3.2 The draft charging schedule proposes that the charge per square metre of floor space be £0. This matches the proposed charge for floor space at Adastral Park; itself a former airbase (between 1917 and 1963) which "has strong strategic importance (including good access and amenity provision) which would benefit from high quality employment functions"³.
- 3.3 Bentwaters and other rural employment sites in Suffolk Coastal District provide flexible tenancy arrangements on sites and in buildings more cost efficiently than available at, for example, Adastral Park.
- 3.4 The Haven Gateway Employment Land Study recognises that the rural employment sites will "continue to prosper" but that the continued success of these sites for employment uses requires ensuring that investment be directed inwards to ensure the sites remain "fit for purpose whilst also maintaining low rental values".
- 3.5 The cost-efficient and flexible rental arrangements at sites like Bentwaters would undoubtedly be completely curtailed and would force businesses to seek out properties where such controls do not exist, were the proposed charge to be raised

³ Para 3.141 of the Haven Gateway Employment Land Study 2009

at all from £0 at any point in the future.

3.6 It is entirely appropriate for the District Council to keep the proposed charge for these sites at £0 to reflect the need of the 'indigenous' businesses that chose to locate themselves there.

3.7 To take any other approach would be to stifle Bentwaters and other similar rural employment sites, remove their flexibility and their ability to cater for the needs of local businesses in the District.

4.0 Conclusion

4.1 The owners of Bentwaters support the proposed floor space charge of £0 for 'all other uses' because this preserves their business models, so important for local businesses, and allows for inward investment keeping the sites "fit for purpose".

4.2 Were the charge to be increased in the future it is believed this would stifle the success of these sites and encumber business forcing companies to move outside of the District to, for example, Ipswich, Stowmarket, Sudbury and Colchester.

Appendix 1

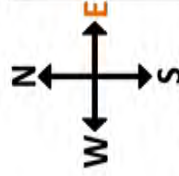
Key



Bentwaters



Local Authority Boundaries



Project: E197/8 CIL Consultation

Drawing title: Location of Bentwaters in the District

Drawing no: CIL rep drawing 1

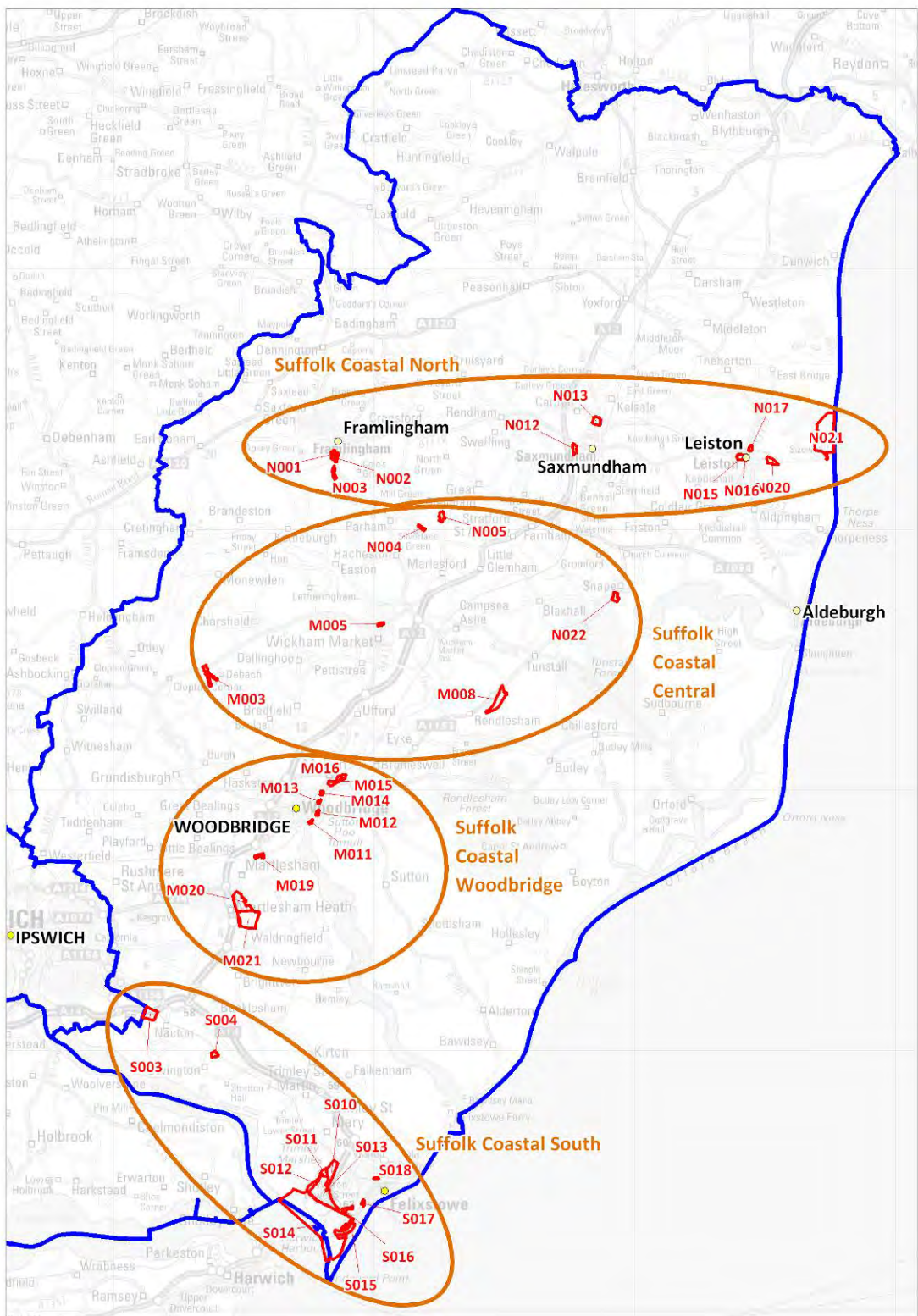
Rev 0 Date: Nov 2014

Scale: NTRS at A4 Drawn: SB



Appendix 2

Figure 6 Employment Sites and Clusters in Suffolk Coastal District



Source: GVA Grimley / Suffolk Coastal DC