

BROMESWELL PARISH COUNCIL

Parish Clerk: Mr Robert Cutts
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Dear Sir

Community Infrastructure Levy Consultation

Parishes have been asked to comment on the draft charging structure for the CIL.

The parishes of Bawdsey, Alderton, Shottisham, Sutton and Bromeswell are so concerned about these proposals that they have formed a group (The Sutton Ward) to register their objections. This group has met to discuss their unanimous opposition to the draft charging structure.

The fundamental objection is that these parishes have been put into a medium house price zone, thereby encouraging development in an area of Outstanding Natural Beauty, the Suffolk Coast and Heaths, the River Deben designation and other planning restrictions. In addition to this, no account seems to have been considered regarding the lack of sustainability of the parishes including the fact that there is just one single road access in and out of the Deben peninsular area which is used by Bawdsey, Alderton, Shottisham and Sutton.

This proposal has the effect of encouraging residential development in one of the most environmentally sensitive parts of Suffolk, thereby making the proposal in conflict with the National Planning Policy Framework which emphasises that AONB's, and SSSI/Ramsar sites merit the highest possible protection. It would appear that SCDC have ignored this Central Government policy which is one reason why it is now challenged. In terms of the economy, it is accepted that a large number of visitors come to this county to enjoy its peace and tranquillity which is provided by the AONB; this will obviously be compromised by your CIL proposal which encourages development in this area and will have an adverse impact on the sustainable Tourism economy.

We wish to challenge the data that presumably lies behind the Peter Brett Associates document. We say 'presume' because they say on para 5.2.2 'Comparables we have used were provided in confidence and cannot be made public' Why not? It is our villages

that you are making assumption about and we feel we have a right to see the raw data which lies behind the house price comparison chart.

We also wish to have an explanation as to how the zones have been made up and the reasons for the decisions about the selection of parishes within each zone. The report says that this decision is somewhat “arbitrary”, but of course “arbitrary” decisions are not appropriate in the open government of today; do you mean “random” when you use the word “arbitrary”? If not there must be some reason behind the choice of what parish to include or exclude in a particular zone. We expect you to disclose those reasons; also we ask for the minutes of the meeting at which the zone selection decision was made, also details of those present.

We wish to see the land registry data used by you with details of the house prices and location of the houses. Are PBA aware that one village (Sutton Heath) predominates in this ward with a considerably larger population than any other? In addition, that village, in stark contrast to the others has a high turnover of houses owing to military mobility and the fact that the value of those houses is about 50% of the value of houses elsewhere in the ward/Zone. We suspect that this house price data has been averaged over the area, thus diluting the others to make Sutton Ward a medium house price area which does not reflect the truth for the other parishes in the zone. Woodbridge is stated as a high value area with 3 bedroom houses selling for £250,000. Similar size houses are selling in these villages for £275,000. In Bromeswell (proposed medium band CIL), there have been 15 house sales in the last 5 years with an average price paid of £464,608 (source: Zoopla 1 July 2014). In Woodbridge (proposed higher band) this figure is 3112 houses sold with an average price paid of £276,547. For our neighbouring village of Ufford (proposed higher band) the figures are 61 houses sold with an average price paid of £342,000. Placing Bromeswell in a lower CIL category than neighbouring towns and parishes with significantly lower average house prices because of “arbitrary” groupings of parishes (your reports word) throws your entire methodology and process into doubt as to its being fit for purpose. It is very difficult to understand why the SCDC Local Planning document adopted as recently in 2013 can adopt a village by village hierarchy, yet for CIL you propose grouping villages with entirely different characteristics in terms of house values.

Suffice it to say, we regard this report as fundamentally flawed and is challenged by us. Listed above is our detailed request for further and better particulars including the raw data and explanations of methodology; we will not be satisfied until we are in possession of the underlying rationale.

We look forward to hearing from you

Yours faithfully

Robert Cutts
Parish Clerk