



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:

| | |
|----------------------|-------------------------------------|
| Name | Ian Kay |
| Organisation | Waldringfield Parish Council |
| Address | |
| Postcode | |
| Phone number | |
| Email address | |

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.

No. The £0 CIL rate for Adastral Park fails to assess the economic viability correctly. In particular it ignores the claim made by BT on many occasions that the development is viable, and underestimates the land value. Walsingham PC made these points in its response to the July 2014 consultation, but SCDC has not addressed them in its reply. See paragraph '**The calculation of the CIL rate is flawed**' on p26 of the Responses to Preliminary Draft Charging Schedule.

We note that the CIL Viability Study says "*Ultimately, if the residual land value is greater than the benchmark land value, there may be capacity for a CIL charge*" (§12.4.7). We hope that (if it persists with the £0 CIL charge) SCDC will therefore monitor the land values and ensure that a CIL is charged if they turn out to be greater than the benchmark values used so far.

The CIL Viability Study also says "*We have not tested the entire scheme due to a lack of readily available evidence on the phasing strategy on a project which may take over 10 years to deliver*" (§12.4.3). David Lock Associates (on behalf of BT) provided a detailed phasing strategy at the Examination in Public in November 2012.

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?

No. The £0 CIL rate for Adastral Park fails to get the balance right, as it provides no direct benefit to the local communities. Walsingham PC made this point in its response to the July 2014 consultation, but SCDC has not addressed our concerns in its reply. See paragraph '**There is no direct benefit for local communities**' on p26 of the Responses to Preliminary Draft Charging Schedule.

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.

Yes

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?

In its response to the July 2014 consultation Waldringfield PC made the point that the S106 agreement for the Adastral Park development has been negotiated in secret between BT and SCDC, with no involvement of local communities, who therefore have no control over how the money is spent, which undermines localism. SCDC has not addressed our concerns in its reply. See paragraph '**Local communities are being sidelined**' on p25 of the Responses to Preliminary Draft Charging Schedule.

Please continue on a separate sheet if necess

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.

| | |
|---|---|
| ✓ | I wish to be heard at the public hearing by the examiner |
| ✓ | I wish to be notified that the Draft Charging Schedule has been submitted for examination |
| ✓ | I wish to be notified of the publication of the report of recommendations of the examiner |
| ✓ | 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