



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: Lydia Voyias (Agent for Taylor Wimpey)

Name	
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Q1: Do you consider that the Council has adequately identified a funding gap using appropriate infrastructure evidence?

As highlighted in our previous response, Suffolk Coastal has not yet produced their Site Specific Site Allocations DPD furthermore the Council is required to undertake an early review of the adopted Core Strategy to specifically update the Objectively Assessed Housing Need and consider appropriate housing targets for the future. The Infrastructure Delivery Plan, produced by Navigas Planning (2014) considers the cost of two scenarios (as highlighted at paragraph 12.1). The document identifies the cost of infrastructure to support the adopted Core Strategy to be over £105 million. Whilst the evidence base provides clear evidence of a funding gap which will need to be met through CIL and S106 contributions, it is unable to properly account for spatial differences that may occur as a direct result of differential distributions and allocations.

I would draw attention to our previous response and the relationship between the proposed approach and that set out in Paragraph 175 of the National Planning Policy Framework. As the site allocations DPD has not been progressed any further, we maintain that the CIL change should not be progressed until the level of growth expected at each settlement is confirmed. The appropriate level of funding, to support the amount of allocated growth, must form the basis of any approach to avoid unnecessary doubt counting of infrastructure requirements (and as such, the associated costs). Such an approach will also provide additional time to source and secure additional funding streams to support the delivery of infrastructure, particularly in respect of the larger planned developments.

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.

Detailed evidence in respect of economic viability is captured within the response prepared by Savills, on behalf of the Housebuilder consortium.

We note that no response has been made in respect of our previous comments in respect of land value, this related to what the land value is based upon i.e. gross site, net developable area, serviced land or un-serviced land, instead the Council refers to their 'market research' as set out in Section 6 of the Peter Brett Associates Viability Report. Further to this it is strongly advocated that a rounded figure should be applied to estimated land values for estimating the viability of the scenarios tested.

We welcome the clarity set out within the response to consultation that professional fees have been set within a range of 8-12%, as per our previous response. Whilst we note that Suffolk Coastal have chosen to use 8%, we hope that this will remain under review to ensure that the CIL is adjusted to properly account for market changes. We note the council's position in respect of build costs and the viability report's allowance for 5% to 10% unknown abnormal costs.

It is noted within the CIL Preliminary Draft Charging Schedule Consultation Responses document that the Council is likely to review the CIL Charging Schedule within 3 years from adoption or alongside a future review of the Core

Strategy. It is welcomed that this review period has also been carried forward into the draft Charging Schedule Document at 5.2 however it maintained that the review should take place more regularly for the Council to continue it demonstrate that CIL is up to date.

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?

As per our previous response, whilst the proposed charging rate for the High Value Residential Area has been viability tested and found to be acceptable, the CIL rate should be based upon a clear understanding of the infrastructure requirements. Flexibility should be provided within the CIL charging rate to ensure the cost of infrastructure and the viability of development schemes are kept up to date on a more regular basis than the three year period suggested at paragraph 5.2 of the draft Charging Schedule Document.

Additionally it is requested that the Council produces a locally defined exemption and relief policy. Given that the Council can not currently demonstrate a five year housing land supply it is considered that there should be a locally defined relief policy to assist in bringing forward sites which are deemed to be unviable. Without the locally defined exemptions/relief it is considered that there will be additional pressure to reduce the supply of affordable housing to improve the viability of schemes.

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.

No. Please refer to representations made by Savills on behalf of Taylor Wimpey (Housebuilder Consortium).

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?

Exemptions and Relief

It is welcomed that the Council makes reference to the Exemptions currently included in the regulations (paragraph 2.5 of the preliminary Draft Charging Schedule). Taylor Wimpey objects to the statement at paragraph 2.4 that there will be no locally defined exemptions. Given that the Council can not currently demonstrate a five year housing land supply it is considered that there should be a locally defined relief policy to assist in bringing forward sites which are deemed to be unviable. Without the locally defined exemptions/relief it is considered that there will be additional pressure to reduce the supply of affordable housing to improve the viability of schemes.

Strategic Sites and £0 per m² CIL rate

The Council is required to undertake an early review of the adopted Core Strategy to update the Objectively Assessed Need for housing to inform housing targets for the District. The Inspector requested that this early review take place in 2015. In addition to this, the Council has not started to produce the Site Allocations DPD. It is considered that there is insufficient information about the supply of housing to bring forward CIL at this moment in time. In particular there is no information

on whether there are likely to be any other strategic sites which should also have a CIL rate of £0 per m². It is reiterated that the Council should progress with the review of the Core Strategy and the production of the Site Allocations DPD before establishing CIL rates for the District.

Implementation Date

It is noted that the Council has not published an anticipated date for when the Council hopes to adopt CIL and make it effective. Given that CIL is intended to offer Developers additional certainty about the infrastructure costs associated with development it is requested that there is a 6 month break between the Council's adoption of CIL and its implementation to allow developers to take full account of CIL.

Review of CIL rates

We note that the Council has committed to reviewing the document every three years. Whilst this is a longer time period that we had suggested, we note the commitment. We would suggest that, in addition to a periodical review, that the IDP is also reviewed when Neighbourhood Plans are 'made' or Development Plans reach significant milestones. This will ensure that the IDP remains up-to-date, relevant and reflects the current planning policy position. In particular it is requested that the District Council works alongside the Education Authority and the NHS to establish a unified approach to planning for growth across the District.

Instalment Policy

We welcome the instalment policy that has been drafted, and believe that the time periods for the three instalments (60 days/ 2 months, 547 days/ 18 months and 730 days/ 24 months of the development commencing for liabilities over £80,000, or 60 days/ 2 months, 365 days/ 1 year and 547 days/ 18 months for liabilities under £80,000) will assist with managing Cash Flow for developments. However it is considered that these instalments are quite ridged and it is requested the instalment timescales for payment for sites are responsive to the scheme in question, particularly where there is also a S106 associated with the development proposals which sets certain timescales for phasing. The Council should work with Developers to assist in maintaining cash flow to enable appropriate CIL payments.

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.

X	I wish to be heard at the public hearing by the examiner
X	I wish to be notified that the Draft Charging Schedule has been submitted for examination
X	I wish to be notified of the publication of the report of recommendations of the examiner
X	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@eastssuffolk.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

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