

Community Infrastructure Levy
Comments on the Consultation Document (May 2014)
Preliminary Draft Charging Schedule

- 1.0 Introduction. I fully support the concept of making a Levy as described in that the developers and or the owners of the development should be expected to pay a reasonable levy towards the costs of increased infrastructure demands. Unlike the Road Tax for vehicles where the tax does not go towards the cost of road maintenance and building but simply swells the Exchequer's coffers, I fully endorse the concept that the Levy would be directly raised for the appropriate infrastructure needed to support the development in hand.
- The concept that the payment of a levy would make the applicant's development more acceptable is sound bearing in mind that so many recent planning applications in the Coastal District would have made extraordinary demands upon the infrastructure which were partly responsible for the applications being refused. By making the levy it alone should focus the minds and budgets of future developers in order to make a more reasonable and responsible planning application.
- Section 106 is of course pertinent to existing applications but the CIL concept would be much more understandable and applicable for future applications, both to the applicant and the public.
- 2.0 We have to take as read, that the total cost of infrastructure needed across the District will be in excess of £100m. I agree that the figure should be based on a scenario whereby growth levels should be in various market towns, since this is where the larger numbers of people reside, work and live out their retirement. That is not to say that the smaller villages should be totally free from development, on the contrary, but the level and size of development should be sympathetic to the scale of the village and not of such a size as to be unreasonable and of higher demand on the very limited infrastructure so frequently in existence in the more rural villages. Such a ridiculous example being for 180 dwellings adjacent to the village boundary of Melton, [DC/14/0991/OUT refers and current consultation for 150 dwellings in Yarmouth Road, Melton.]
- 3.6 The funding gap of £80m identified by the IDP certainly justifies the introduction of the CIL and I think further thought should be given to a more firm and consistent drawing of the levy, leaning more towards ensuring rules for development rather than the 'desirability' of funding which as currently envisaged may leave a few doors and aspirations open for negotiation.
- 3.11 I do not think 'discretion exercised by the Council Charging Authority' should be all that necessary, as again this hints of negotiation. A clear set of standards, rules of engagement and the clarity of what charges affect which development, would be much more preferable and simply to become the 'new era' in planning development circles.
- 3.15 The concept of 'different rates for different areas' introduces a whole can of worms and opportunities for challenge by developers. Upon what criteria would the differences be based? Surely not on the levels of poverty or wealth in the community, nor the

availability of getting work, affordability of the residents or appeal of the area for second home buyers, overspill, tourism, immigrants, or the numbers of young persons needing jobs and housing.

- 3.17 I do not see the relevance or connection between demands for infrastructure and the relative 'expensive parts' such as Aldeburgh, Framlingham, Kesgrave, Saxmundham and Hollesley. The cost of new infrastructure depends upon totally different criteria and is surely not related to the 'cost of property' in an area, whether it be domestic, commercial or industrial. I can fully understand the need for different levy rates between the types of development but not to costs or wealth in the area in the District. The **cost** of the improved infrastructure is tied to the infrastructure needed not the cost of the development and obviously for new industrial and large commercial properties or new housing estates any new infrastructure work could be very large and costly, relative to that needed for a dozen new residential dwellings.
- 3.18 Quite rightly, the levy should be clear for all to understand and should not be negotiable. I have made this point before but it is in my mind an important point. It should become a norm in the minds of developers, owners and architects and form part of the overall algebra in the costing and finance of their projects.
- 3.21 I do not understand the categorising of private dwellings as I feel the levy should apply to any increase in floor area whether it be an extension to a house, a new house or additional floor space within the dwelling, such as an attic development. The levy should also apply to any 'windfall' build in someone's back garden, etc. This policy should equally apply to commercial and industrial expansion as well.
- 3.23 I cannot really see any justification for allowing exemption to Comparison Retail and charging for Convenience Retail. If anything should differentiation be allowed, then exemption would be fairer for those developments that serve the essentials for life in the community such as food, chemist, drink and charges by levy for the less essential and luxury goods developments.
- 5.0 Preferably, it would be desirable to limit exemptions to the absolute minimum and clearly not for negotiation. Such new premises for the defence of the realm, fire, police, medical, education, gas, water, electricity and sewerage should be exempt, there is really no justification for charging a levy on the suppliers of the infrastructure who are the very people we need to support with funds.
- 5.3 The dispensation suggested for parish councils with a parish plan is a good incentive for those that do not currently have a plan, to get the community together and produce a viable and acceptable plan as soon as possible. This in itself will focus their own minds on how they regard housing and other development in their own back yards.
- 5.5 In so many applications, the provision of affordable housing is used as the sprat to catch the mackerel to obtain consent. In fact, affordable housing will need the infrastructure just as much as non affordable housing. In order to achieve a reasonable value to the provision of affordable housing, it may be a useful solution to ensure the levy cost is paid at the source and not passed on down the line so that the buyer is expected to pay the ante in the overall cost of purchase

6.4 Should the levy be introduced by April 2015, it will be an excellent landmark in the progress towards District Planning modus operandi and much recognised by the ratepayers as a real step forward.

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