



Martlesham Parish Council

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Clerk: Mrs Susan Robertson

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Mark Edgerley
Principal Planner – Planning Policy & Delivery
Suffolk Coastal District Council
Melton Hill
Woodbridge
Suffolk IP12 1AU

Our ref: 14-182-cil

Dear Mr Edgerley

Community Infrastructure Levy – Preliminary Draft Charging Schedule Public Consultation

Martlesham Parish Council has considered the proposals in the Community Infrastructure Levy Preliminary Draft Charging Schedule dated May 2014 and we strongly object to the proposal for a zero CIL for the AdastralPark site on the grounds that it would prevent local communities prioritising any spend, as has already been the case with the S106 agreement for that site.

We have the following comments:

- 1) We believe that the District Council proposal to set the CIL at zero is based on the assumption that any portion of the CIL which is prioritised by the local community is completely incremental spend and hence significantly increases the cost to the developer.
- 2) We do not think that is the case - most of the locally prioritised CIL spend would very probably align broadly with what is in the S106 so in reality there would be very little incremental spend relative to the total cost of the site's infrastructure.
- 3) Having a CIL in place which allows the local community to prioritise some spend would:-
 - help get the local community on board and increase the likelihood of a successfully integrated new community, which is already our jointly agreed objective;
 - go hand in hand with the discussions we are having about how the BT development would be dealt with in the context of a Neighbourhood Plan;
 - capture local experience and issues which planners from elsewhere might not be aware of;
 - help direct some spend towards mitigating the impact of the new development on the existing communities. BT's submission to the inspector concerning S106 (Matter Number 7/Lawrence Revill/Respondent Number 2444) seems to focus only on mitigation of the sensitive wildlife areas.

We find it difficult to believe that the NPPF intended that in such situations the local community would be "locked out" in this way. Not only would the original residents be excluded at the inception, but the residents of the new development would also be locked out for the complete duration of the development.

We therefore strongly request that, before the CIL schedule is finalised, we meet to discuss alternative approaches.

Our understanding is that it is lawful to have both a CIL and S106 in place for a specific site. This is not "double dipping" because the two streams of income would be used for different things - the sum total of which would be what is required to make the site as a whole sustainable. For example, having established that the Adastral site can have its own CIL level, rather than setting it at zero, would it be possible to set it a suitable low value which would allow a reasonable level of funds to be available for local priorities?

Yours sincerely

Susan Robertson
Clerk

Cc District Councillors C Blundell & J Kelso
Hilary Hanslip, Principal Planner
Philip Ridley, Head of Planning Services