



Community Infrastructure Levy-Preliminary Draft Charging Schedule

The Preliminary Draft Charging Schedule is subject to public consultation from Wednesday 21 May until Wednesday 2 July 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.

Contact Details:

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Q1: Taking into account the viability evidence used to inform the Preliminary Draft Charging Schedule do you consider the proposed rates to be correct? If you disagree, please provide evidence to support your view.

Para 3.18 states that the Viability Study suggests charges *over* £123/sqm (low), *over* £171/sqm (mid) & *over* £291/sqm could be achieved, but "these figures are considered unreasonable as they are maximums". The figures quoted in the table at 3.15 represent only 41-57% (low), 53-67% (mid) and 51% (high) of these values and thus appear unreasonable generous, given the continuing attractiveness of living in the district.

Q2: Do the proposed rates based on viability and infrastructure evidence in the Preliminary Draft Charging Schedule strike the appropriate balance between the collecting of CIL and the potential effects of the imposition of CIL on economic viability across the district? If you disagree please provide evidence to support your view?.

Given that the Infrastructure Delivery Plan and Draft Charging Schedule both identify the funding gap (total cost less public body funding) at £80M, and the DCS at para 4.2 identifies the revenue likely to be raised by CIL on residential property at £15-£20M, there would appear to be an unfunded shortfall in the region of £60-65M. Coupled with the apparently generous level at which the charge per dwelling has been proposed and NIL charge for all development types other than

Convenience Retail, the balance appears to be inappropriately skewed towards the developer. Unless unfeasibly large amounts of public funding become available during the plan period, this suggests that much of the necessary infrastructure will not be provided.

Q3: Do you have any comments on the boundaries identified for residential development across the district?

The map provided in the Appendix is of very poor resolution, but it appears that Melton and Woodbridge are included in the 'High' charging zone. Based on knowledge of house prices in this area, the parish council believes this to be correct.

Q4: Do you have any comments on the sitesize thresholds identified and the different charges within the Preliminary Draft Charging Schedule?

The arithmetic suggests that the proposed setting of the threshold at 6+ dwellings would probably encourage provision of small developments of 6 homes (triggering a requirement for 2 Affordable Homes) rather than 5 (with only 1 Affordable Home).

Q5: Do you have any comments on the charges associated with retail developments?

Whilst present market conditions might mean that construction of new Comparison Retail floorspace is stagnant, whilst Convenience Retail is proving more resilient, the situation might change radically in a few years. Comparison Retail development tends to be by larger businesses, on larger sites, often out-of-town, which generate pressure for improved public realm infrastructure, particularly transport. In comparison, Convenience Retail development tends to be, or is more amenable to, smaller businesses on smaller sites within town / village centres, which generate less pressure for improved public realm infrastructure. The proposed charging structure therefore appears perverse. The charge for Comparison Retail should be set at a higher level than £0 per sqm.

Q6: Do you agree with the zero charge associated with Adastral Park?

The logic appears to be that a larger developer contribution could be obtained by use of traditional s106 negotiations. However, as indicated at para 2.3 these agreements involve extensive negotiation and can be reduced or waived on viability grounds - which any developer worth his salt would doubtless plead. Given the eventual size of the proposed Adastral Park development (aspirations are allegedly for 3,000 dwellings eventually), the Infrastructure Needs identified in Table 6.1 of the IDP appear inadequate, particularly when compared with similar sized developments in other commercially attractive parts of the country. Some of the proposals (particularly £10M of bus subsidies) appear to offer poor value for money, whilst the exclusion of any rail scheme (*e.g.* a new Martlesham Parkway station) seems a missed opportunity. For these reasons, and in order to ensure that the *full* development scheme (not just the pre-2027 part) is captured, Adastral Park should NOT be subject to a zero charge.

Q7: Do you agree with the zero charge associated with all other uses?

See response to Q2 *re* the apparent large unfunded shortfall. Applying a zero charge of all other

uses (e.g. offices, hotels, care homes and industrial), all of which are intended to generate profit for the developer (initially) and operator (ongoing), and many of which will generate pressure for improved public realm infrastructure, particularly transport, appears unreasonable generous, unless unfeasibly large amounts of public funding become available during the plan period. These uses should NOT be subject to a NIL charge.

Q8: Do you have any other comments on the Preliminary Draft Charging Schedule? If so please identify the paragraph your comments relate to?

A significant concern is the apparent lack of any local or community engagement in the preparation of the Infrastructure Delivery Plan, on which the whole CIL charging structure is based. Some issues which result from this inexplicable exclusion of the community from the development of the *Community Infrastructure Levy* are set out in the following additional comment box.

Response to Unasked Question: Do you have any other comments on the Infrastructure Delivery Plan?

- Para 2.14 of the Infrastructure Delivery Plan needs to be amended, with the reference to Woodbridge reading 'Woodbridge *inc* parts of Martlesham & Melton' and the addition of Melton to the list of parishes undertaking neighbourhood plans.
- Para 4.8 should refer to Framfield *House* Surgery in Woodbridge.
- Para 4.10 – it is unclear why Framfield House Surgery is excluded from the list of possible practices in Woodbridge, as unlike Lt. St. Johns Street Surgery it is modern and on a spacious site.
- Para 5.8 – it is noted with concern that Melton Water Recycling Plant is already at capacity in dry weather (which is most of the time!) whilst Anglian Water is unable to provide costs for additional infrastructure required to meet growth, here or elsewhere.
- Section 6 – Transport. As we understand it finally to have been acknowledged that the A1152 road is already very heavily used, if not at capacity (with two-way peak congestion on the final Melton section now commonplace), it is extremely disappointing to see no mention made of improvement to this road in either the narrative or Tables.
- Section 8 Leisure & Community. It is noted with concern that the Woodbridge area has a significant (55%) shortfall in land provided for sports facilities and a requirement for two additional Neighbourhood Equipped Areas for Play (NEAPs), the major part of the shortfall across all five market towns.
- Section 9 Green Infrastructures. It is noted with concern that (#9.6) "most residents away from the coast are deficient at the neighbourhood level of Accessible Natural Greenspace (ANG). This is surely an area where community engagement is essential, perhaps demonstrating why the 'schemes & costs' sub-section is so lightweight.

Thank you for your comments. Please return this form to Planning Policy and Delivery Team, Suffolk Coastal District Council, Melton Hill, Woodbridge, IP12 1AU or alternatively via email to development.policy@suffolkcoastal.gov.uk before the consultation closes on Wednesday 2 July at 17.00.

Data Protection Statement: The information you have supplied may be processed by computer records. Suffolk Coastal District Council will use the data for purposes relevant to the preparation of the Local Plan under The Town and Country Planning (Local Planning) (England) Regulations 2012 and for no other purpose.