

Planning Policy and Delivery Team
Suffolk Coastal District Council
Melton Hill
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| SCDC | |
| - 3 JUL 2014 | |
| Authorised | Approved |
| 1 st July 2014 | |

Dear Sir

Consultation on Community Infrastructure Levy – Preliminary Draft Charging Schedule, Statement of community Involvement

Community Infrastructure Levy: Disagree

Charging authorities are clearly allowed discretion in how they set the CIL. SCDC indicate that they have to strike a balance between the desirability of funding infrastructure to support development from the CIL and the economic viability of developments. SCDC are clearly dependent on the Adastral Park development for the deliverability of its Core Strategy as the only strategic site. The Adastral Park development is assessed at £0 CIL based on the finding that the residual land value is lower than the benchmark land value. The formula for calculations is based on 'assumptions' and 'approximations' with 'margins of uncertainty' etc. The assumptions about land values seem very low, the valuing of land at Adastral Park at £842,450 per hectare seems designed to pave the way for £0 CIL. There is little evidence to indicate that the land values used for this calculation are in any way accurate.

Much is made of the site specific infrastructure requirements at Adastral Park and their impact on the viability of the development. However this does not appear to have dampened BT's determination to strenuously pursue this development in any way, presumably being aware from the outset of the likely infrastructure requirements of such a large development.

The argument is put that the S106 agreement is a more satisfactory way of funding infrastructure for the Adastral Park development because much of it is site specific. However the S106 process excludes the local community from having any involvement in the process or gaining any benefit from it as negotiations take place in secret between the developer and the Council. The CIL and S106 are not mutually exclusive and so infrastructure for Adastral Park could be part funded by CIL - a more transparent levy which would allow the local community some involvement in the process which seems in part to be the intention of the CIL – helping communities to accommodate to new development.

Statement of Community Involvement

Given the history of SCDC's consultations with the local community over the Core Strategy it is difficult to find any comfort in this Statement of Community Involvement. Despite the attempts to

make it a more user friendly document emphasising the benefits of community involvement it is of no value if the Council do not take any notice of the views expressed by the community. There is nothing here that indicates that the Council intend to pay any more attention to the views of the local community than it has done over the past few years during the Core Strategy consultations. As a resident who has responded regularly there has been little evidence that the Council has listened or taken on board the views expressed by this community.

Yours faithfully

A solid black rectangular box redacting the signature of Rosa Waller.

Rosa Waller