

Date: 2 July 2014
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Philip Ridley
Suffolk Coastal District Council
Melton Hill
Woodbridge
Suffolk
IP12 1AU

Dear Mr Ridley,

Suffolk Coastal District Council- Draft CIL charging schedule

Thank you for consulting Suffolk County Council on the above matter. The services which the County Council provides are fundamental components of sustainable communities and, as recognised by national policy, it is vital that our authorities work together to ensure that they are delivered through different planning obligation mechanisms. Suffolk County Council has already contributed to the Infrastructure Delivery Plan and will continue to co-operate in the production of the evidence to support this process.

This response is based on the most recent local development scheme and the understanding that Suffolk Coastal is moving toward site allocations. The County Council will continue to work with the District, regardless of the approach to planning obligations which it chooses to apply, as a collaborative approach is essential. Whilst we are able to consider likely scenarios, the absence of site allocations reduces our ability to determine where new infrastructure should be provided. Some infrastructure, such as schools, require long lead-in times. The County Council encourages and supports the District Council in its efforts to allocate sites.

When the Regulation 123 list is produced it will need to consider the relationship between strategic transport improvements and site specific measures, such as Section 278 agreements.

Detailed comments are as follows.

- 3.20 - The County Council supports applying a zero charge to the Adastral Park development given that this will indeed be necessary for ensuring that proper infrastructure provision is made through a Section 106 agreement.

- 3.28 - This paragraph notes that 'care homes' will not be able to contribute toward CIL and remain viable. Given the different economics and the pressing need to deliver additional supported housing to cope with Suffolk Coastal's ageing population, the consideration given to the viability of care homes is welcomed. However, supported housing types form a spectrum, from sheltered housing to nursing care. Some types, such as Extra Care Housing, do not necessarily always fall into Class C2.¹ For this reason, the District Council should clarify the term 'care home' and the County Council would be happy to assist in this matter.
- 5.2 - The reference to the County Council is welcomed. Our authorities will need to develop robust, objective and policy-compliant mechanisms for ensuring that CIL monies are spent properly.
- 5.6 - This paragraph notes that no locally specific exemptions are expected to be introduced. This approach needs to be considered against the provisions of Policy SP30 of the Core Strategy, and the emerging Deben and Alde/Ore Estuary Plans. If further exemptions are to be applied, anywhere in the district, the County Council would wish to have confidence that relevant infrastructure can be delivered through another mechanism.

I hope that these comments are helpful. Please contact myself or my colleague Robert Feakes, who's contact details are at the top of this letter, if we or any other County Council officers can be of assistance.

Yours sincerely,

James Cutting
Planning Strategy Manager
Economy, Skills and Environment Directorate

¹ See:

http://www.housinglin.org.uk/library/Resources/Housing/Support_materials/Viewpoints/Viewpoint_20_Planning_Use_Classes.pdf