

**SCDC Community Infrastructure Levy
Draft Charging Schedule and Viability Report
Consultation Response
by Waldringfield Parish Council**

Waldringfield Parish Council agrees generally with the introduction of the CIL in Suffolk Coastal District for the reasons given in §2.2 and §2.3 of the Draft Charging Schedule. However, we strongly disagree with the proposal to set the CIL rate for the Adastral Park development to £0/sqm, as described in §3.20. Our reasons for this are given below.

Local communities are being sidelined

The National Planning Policy Framework says: *“The Community Infrastructure Levy should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place.”* (NPPF, §40, our emphasis)

The S106 agreement for the Adastral Park development has been negotiated in secret between BT and SCDC, with no involvement of local communities. Having a meaningful CIL rate would give local communities some measure of control over how part of the money is spent, as envisaged in the NPPF. It would encourage local people to feel more involved in the process, more positive towards the development, and increase the likelihood of successfully integrating the new development with the existing communities. It is also possible that if local people were involved, they would bring to the table experiences and issues which the more remote planners from elsewhere might not be aware of.

It seems that to lock out the local communities in this way goes completely against the spirit of ‘localism’ that the CIL is designed to encourage.

There is no direct benefit for local communities

Within the IPA, Area 4 (land to the south and east of Adastral Park) was chosen for the development of 2,000 houses (Core Strategy, SP20). The alternative sites (Areas 1-3 and 5), as well as the option to disperse the housing over several sites, were dismissed even though it was clear that the infrastructure requirements associated with the Adastral Park site was far greater than the alternatives. In particular, the proximity of Adastral Park to the Deben Estuary SSSI/SPA/Ramsar site required a higher level of mitigation. This increased the costs, which were largely to mitigate the damage caused by such a large development in such a sensitive area and to make the development ‘sustainable’. So the S106 agreement had to provide a higher level of funding than would have been the case if the 2,000 houses had been located elsewhere, or more widely dispersed.

It is also necessary to provide extra infrastructure as a direct result of the new development, such as the road ‘improvements’ on the A12. This brings no direct benefit to local communities, it is simply to prevent gridlock on the roads resulting from the extra traffic generated by 2,000 householders.

These large costs are being met by the S106 agreement, and are now being used as a justification for withholding CIL funds from local communities to spend in ways they see fit. So the largest, most intrusive and

disruptive development in the District in living memory will provide no direct financial benefits to the local communities most affected.

The calculation of the CIL rate is flawed

A basic requirement for the soundness of the Core Strategy is that developments should be deliverable, and therefore viable. SCDC and BT (via David Lock Associates) both argued strongly at the External Examination that the Adastral Park development was viable.

In the National Planning Policy Guidance notes on viability and plan making it says: "**All development costs should be taken into account including:**

...

- *infrastructure costs, which might include roads, sustainable drainage systems, and other green infrastructure, connection to utilities and decentralised energy, and provision of social and cultural infrastructure;*
- *the potential cumulative costs of emerging policy requirements and standards, emerging planning obligations policy and **Community Infrastructure Levy charges**;"* (Para: 013, Reference ID: 10-013-20140306, our emphasis)

In other words, when SCDC and BT said at the External Examination that the Adastral Park development was viable, that assessment took into account the CIL charges (or should have done) as well as other infrastructure costs. How can SCDC now say that including CIL charges would make the development unviable? ("*once site specific costs have been taken into account, the introduction of a CIL charge would make the development unviable.*" Draft Charging Schedule §3.20).

The assessment of the capacity for a CIL charge at Adastral Park in the Viability Report, §12.4.7, depends on the benchmark value of the land, which is claimed to be £1m per ha. This is an unrealistically low figure, which appears to have no supporting evidence or indeed any indication of where it came from. We believe it should be at least doubled to make it realistic.

We appreciate that S106 is the better mechanism for funding most of the specific infrastructure requirements for a large site such as Adastral Park. However, the CIL and S106 are not mutually exclusive. The CIL payment and S106 obligations could (and should) cover different things, and the developers would not be charged for the same items of infrastructure through both S106 and the CIL. We urge SCDC to re-calculate the viability of the Adastral Park development using more realistic figures, particularly land values. A CIL rate should be set which would allow a reasonable level of funds to be made available for local priorities, which we believe is possible without jeopardising viability.

Waldringfield Parish Council, 2nd July 2014