

**Community Infrastructure Levy Regulations 2011 (amended)**  
**Preliminary Draft Charging Schedule Consultation**  
**3 October 2011 – 14 November 2011**

## How to respond to this consultation

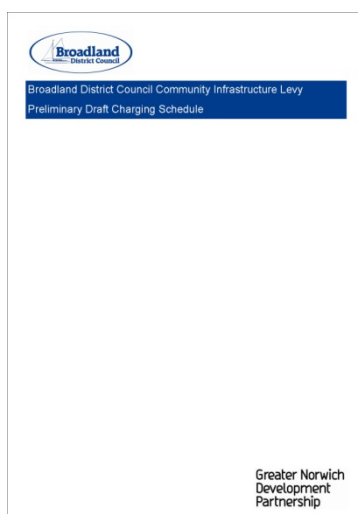
The Community Infrastructure Levy (CIL) is a new levy that local authorities in England and Wales can charge on new developments in their area. The money will be used to support development by funding infrastructure that the council, local community and neighbourhoods want – for example, new or safer road schemes, public transport and walking and cycling schemes, park improvements or a community hall.

The system is very simple. It applies to most new buildings and charges are fixed based on the size, type and location of the new development.

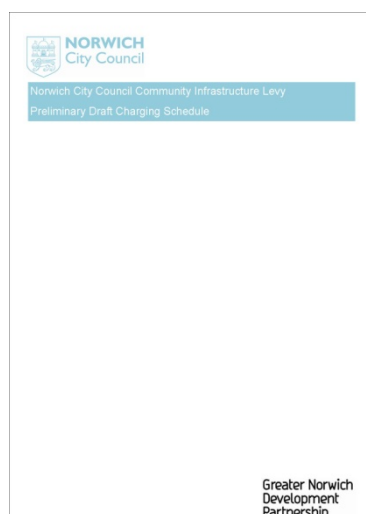
The three councils of Broadland, Norwich and South Norfolk have chosen to work together as the Greater Norwich Development Partnership (GNDP) and adopt a co-ordinated approach to the implementation of CIL. In order to comply with the regulations, three separate Preliminary Draft Charging Schedules have been published for comment. These are almost identical and they share the same evidence base. The only difference in the schedules relates to the geographical charging zones, Norwich is entirely in Zone A and Broadland and South Norfolk include areas in both Zone A and Zone B.

This is the first stage in consultation for setting a CIL for the three districts.

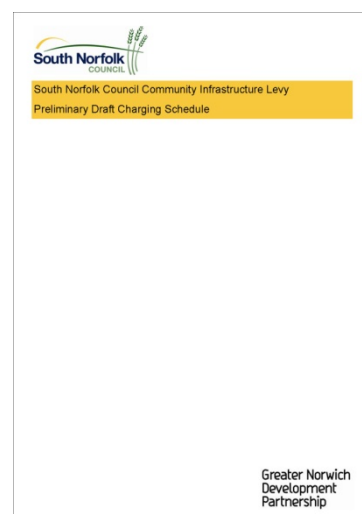
The Broadland District Council Preliminary Draft Charging Schedule looks like this:



The Norwich City Council Preliminary Draft Charging Schedule looks like this:



The South Norfolk Council Preliminary Draft Charging Schedule looks like this:



## Getting involved

The consultation documents are:

- Preliminary Draft Charging Schedule for Broadland
- Preliminary Draft Charging Schedule for Norwich
- Preliminary Draft Charging Schedule for South Norfolk

As part of this consultation a number of documents providing supporting evidence have been published:

- The explanatory document 'Community Infrastructure Levy: Background and Context'
- Viability Advice on a CIL/ Tariff for Broadland, Norwich and South Norfolk (GVA, December 2010)
- Charging Zones Schedule Report (GVA, July 2011)
- Topic Paper: Green Infrastructure and Recreational Open Space (GNDP, June 2011)

There is also earlier background information supporting this consultation:

- Joint Core Strategy for Broadland Norwich and South Norfolk adopted March 2011
- Infrastructure Needs and Funding Study (EDAW/ AECOM 2009)
- Local Investment Plan and Programme for Broadland, Norwich and South Norfolk v4 June 2011

All these documents are available on the GNDP website, at [www.gndp.org.uk](http://www.gndp.org.uk).

The consultation documents and evidence can be viewed at each of the district council offices.

The consultation documents will also be available at libraries, at the Broads Authority offices and at the Norfolk County Council offices at County Hall. Where facilities are available evidence can be accessed via the GNDP website, [www.gndp.org.uk](http://www.gndp.org.uk).

The Department of Communities and Local Government has produced a helpful guide to the Community Infrastructure Levy that can be found on their website:

<http://www.communities.gov.uk/publications/planningandbuilding/cilsummary>

## You can respond to this consultation by email or by post:

The Preliminary Draft Charging Schedules and the supporting evidence are open for six weeks of consultation from **3 October 2011** to **14 November 2011**. Consultation responses must be received by **5pm** on **Monday 14 November 2011** in order to be considered.

A response form is available on the GNDP website at [www.gndp.org.uk](http://www.gndp.org.uk). If possible, please use this form to assist us in analysing your response and in publishing them correctly.

For more information contact the GNDP:

**tel:** 01603 430144  
**email:** [cil@gndp.org.uk](mailto:cil@gndp.org.uk)

When responding to the consultation you can comment on one, two or all three schedules. You can:

- Use one form to comment on the Preliminary Draft Charging Schedule for one district using one response form, or to give the same comment on the Preliminary Draft Charging Schedules for two or all districts or,
- Use more than one form to give different comments for each district's Preliminary Draft Charging Schedule that you are commenting on

Please note that comments cannot be treated as confidential. All responses to this consultation will be made available as public documents. Unfortunately we are only able to acknowledge emailed responses, but all comments will be carefully considered.

## Forms and comments can be:

**emailed to:** [cil@gndp.org.uk](mailto:cil@gndp.org.uk)  
**posted to:** GNDP, PO Box 3466, Norwich, NR7 7NX  
**hand delivered:** to your local district council office:

- Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Norwich NR7 0DU
- Norwich City Council, City Hall, St Peter's Street, Norwich, NR2 1NH
- South Norfolk Council, South Norfolk House, Swan Lane, Long Stratton, NR15 2XE

## Evidence

Please use this section to give us any comments you have on the evidence:

- The explanatory document 'Community Infrastructure Levy: Background and Context'
- Viability Advice on a CIL/ Tariff for Broadland, Norwich and South Norfolk (GVA, December 2010)
- Charging Zones Schedule Report (GVA, August 2011)
- Topic Paper: Green Infrastructure and Recreational Open Space (GNDP, June 2011)

**Question 1:** Having considered the evidence do you agree the appropriate balance between the desirability of funding from CIL and impacts on the economic viability have been met?

Yes ☐ No ☐

Please add any comments below

**Please see our comment at question 15**

My answer applies to (please tick one or more of the boxes):

Broadland ☐ Norwich ☐ South Norfolk ☐ All ☒

## Geographical zones

Please use this section to give us any comments about the boundaries of the geographical charging zones shown in appendix 1 of the Preliminary Draft Charging Schedule

### Non-residential development zone boundary

**Question 2:** It is intended that, for non-residential development, one charging area will apply to the administrative areas of Broadland District Council, Norwich City Council and South Norfolk Council. Do you agree with this approach?

Yes ☐ No ☐

Please add any comments below

**Please see our comment at question 15**

My answer applies to: (please mark one or more of the boxes):

Broadland ☐ Norwich ☐ South Norfolk ☐ All ☐

### Residential development zone boundaries

**Question 3:** The viability evidence supports two charging zones for residential development, Zone A and Zone B. The Norwich City Council area falls entirely in Zone A. Broadland District Council and South Norfolk Council areas are within Zone A and Zone B. Do you agree with the boundaries for the charging zones?

Yes ☐ No ☐

Please add any comments below

**Please see our comment at question 15**

My answer applies to: (please mark one or more of the boxes):

Broadland ☐ South Norfolk ☐ All ☐

## Charging Schedule

Please use this section to comment on the rates of charge as shown in the table on page 2 of the Preliminary Draft Charging Schedule

### Residential development – Zone A

**Question 4a:** It is intended that the rate of charge for residential development in Zone A will be within a range of £135 to £160 per m2.

What do you think the rate should be?

**Question 4b:** What is your justification for this rate?

**Please see our comment at question 15**

My answer applies to (please tick one or more of the boxes):

Broadland ☐    Norwich ☐    South Norfolk ☐    All ☐

**Residential development – Zone B:**

**Question 5a:** It is intended that the rate of charge for residential development in the Zone B will be £75 per m2. Do you agree with this approach?

Yes

☐

No

☐

Please add any comments below

**Please see our comment at question 15**

**Question 5b:** If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland

☐

Norwich

☐

South  
Norfolk

☐

All

☐

**Residential development – zones A and B**

**Question 6a:** It is intended that the rate of charge for domestic garages (excluding shared-user garages) in Zones A and B will be within a range of £25 to £35 per m2.

What do you think the rate should be?

**Question 6b:** What is your justification for this rate?

**Please see our comment at question 15**

My answer applies to (please tick one or more of the boxes):

Broadland

☐

Norwich

☐

South  
Norfolk

☐

All

☐



**Large convenience goods based supermarkets and supermarkets**

**Question 7a:** It is intended that the rate of charge for large convenience goods based supermarkets and superstores of 2,000m<sup>2</sup> gross or more will be £135 per m<sup>2</sup>. Do you agree with this approach?

Yes

☐

No

☐

Please add any comments below

**Please see our comment at question 15**

**Question 7b:** If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland

☐

Norwich

☐

South  
Norfolk

☐

All

☐

**Other retail and assembly and leisure developments**

**Question 8a:** It is intended that the rate of charge for all other retail and assembly and leisure developments will be £25 per m2 (including shared user garages). Do you agree with this approach?

Yes

☐

No

☐

Please add any comments below

**Please see our comment at question 15**

**Question 8b:** If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland

☐

Norwich

☐

South  
Norfolk

☐

All

☐

### Community uses

**Question 9a:** It is intended that the rates of charge for all other Community Uses will be £0 per m2. Do you agree with this approach?

Yes



No



Please add any comments below

**We agree with the principle of this approach, and would strongly advocate that the Levy should not be applicable to Fire and Rescue Service building developments as 1) they have no commercial intent, and 2) they are a community asset protecting the community.**

**We would also suggest the same would apply to other emergency service use.**

**Our longer term aspiration is to achieve multi emergency service use. In context to CIL bids, we believe this approach should be outside the Levy.**

**We see the potential for a financial contradiction under the current proposal i.e. on one hand we would have to pay the levy for the development of a new station, and then receive money from the GNDP to pay for the build.**

**We would reiterate the point that fire stations are a community asset and should not be liable for payment of the Levy.**

**Question 9b:** If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland



Norwich



South  
Norfolk



All



**Other types of development**

**Question 10a:** It is intended that the rates of charge for all other types of development (including shared-user garages) covered by the CIL regulations will be £5 per m2. Do you agree with this approach?

Yes

☐

No

☒

Please add any comments below

**The current proposal would see the application of the Levy to Fire and Rescue Service property developments. We would refer you to our response in 9a above, and further highlight our view that the Fire and Rescue Service should not be subject to the Levy as we are a community function and are not a commercial entity.**

**Question 10b:** If you answered no to the above question:

What should the charge be?

What is your justification for this rate?

My answer applies to (please tick one or more of the boxes):

Broadland

☐

Norwich

☐

South  
Norfolk

☐

All

☒

There are other issues we would like your views on, though these are not part of the Preliminary Draft Charging Schedules.

### Discretionary relief

The approach to discretionary relief can be found on page 3 of the Preliminary Draft Charging Schedule and in section 12 of the 'Community Infrastructure Levy: Background and Context'.

**Question 11** Do you agree with the approach to Discretionary Relief?

Yes ☐ No ☐

Please add any comments below

**Please see our comment at question 15**

My answer applies to (please mark one or more of the boxes):

Broadland ☐ Norwich ☐ South Norfolk ☐ All ☐

### Staging of payments

The approach to the staging of payments can be found in page 3 of the Preliminary Draft Charging Schedule and in section 11 and appendix 4 of the document 'Community Infrastructure Levy: Background and Context'.

**Question 12:** Do you have any comments about the draft policy

Yes ☒ No ☐

Please add any comments below

**Should the Fire and Rescue Service seek CIL funding and be successful, how would the GNDP assure payment to the Fire and Rescue Service and manage inflationary costs should they arise.**

My answer applies to: (please mark one or more of the boxes):

Broadland ☐ Norwich ☐ South Norfolk ☐ All ☒

### Payment in kind

Within the GNDP area, where land is required within a development to provide built infrastructure to support that development (such as a school) it will be expected that land transfer will be at no cost to the local authorities and will not be accepted as a CIL payment in kind. Where the facility is needed to serve more than one development, any land transfer over and above that needed for the specific development would be regarded as payment in kind of CIL. The approach to payment in kind can be found on page 3 of the Preliminary draft charging schedule and in section 12 of the document 'Community Infrastructure Levy: Background and Context'.

**Question 13:** Do you agree with the approach to payment in kind?

Yes ☐ No ☐

Please add any comments below

**We have no comment to make on this point**

My answer applies to: (please mark one or more of the boxes):

Broadland ☐ Norwich ☐ South Norfolk ☐ All ☐

## Neighbourhoods and CIL

The Government proposes that neighbourhoods where development takes place will receive a 'meaningful proportion' of CIL revenue to spend on infrastructure projects locally. The local community will be able to decide how this money should be spent as long as it is used for infrastructure.

The government is currently consulting on this proposal which can be found its website at [www.dclg.gov.uk](http://www.dclg.gov.uk).

The consultation suggests that in Broadland and South Norfolk districts the Parish and Town Councils will take on this responsibility. In Norwich, where there are no Parish or Town councils, an approach appropriate to the area will need to be developed.

**Question 14a:** Subject to any updated Regulations it is proposed that 5% of the net CIL receipts be passed to local communities (e.g. the Parish Council or Town Council in the two rural districts) who express an interest in receiving it. Do you agree with this approach?

Yes

☐

No

☒

Please add any comments below

**The provision of Fire and Rescue Service response is the direct responsibility of Norfolk County Council and the Chief Fire Officer. The Fire Authority is obliged to complete an Integrated Risk Management Plan that assesses and quantifies risk, including associated risk profile within our communities. A safety plan details how the Fire Authority will discharge its duty to provide fire and emergency response and includes how it delivers its statutory obligations towards prevention and fire protection measures. Community infrastructure forms part of the assessment of risk and needs to manage and protect communities i.e. larger housing and commercial developments may require additional or improved fire service facilities and capabilities. The Fire and Rescue Service is mandated by the Fire and Rescue Services Act to manage the Fire and Rescue Service response in Norfolk.**

**In context to Q 14a there should be a formalised process on what infrastructure takes precedence over other items, and how these are selected. In relation to this point the Fire and Rescue Service would require formal representation at County level.**

My answer applies to: (please mark one or more of the boxes):

Broadland

☐

Norwich

☐

South  
Norfolk

☐

All

☒

**Question 14b:** Do you have any views about how the CIL which will be made available for the local community in Norwich, where there are no Parish or Town Councils, should be administered?

Please add any comments below  
( above refers)

## Other comments

**Question 15:** Do you have any other comments on the Preliminary Draft Charging Schedule(s) or the Community Infrastructure Levy?

Yes



No



Please add any comments below

**Norfolk Fire and Rescue Service would draw attention to the following.**

**Whilst we appreciate and welcome that the CIL enables an initial funding stream to support the development of Infrastructure, there appears to be no provision for the ongoing maintenance of measures put into place once the item(s) have been established and funded. We anticipate that investment in infrastructure would have the consequential effect on raising public revenue streams (business rates, council tax etc) however these may not cover additional costs for the ongoing maintenance of new infrastructure.**

**Good examples of this would be installation of fire hydrants (usually paid for and maintained at the Fire and Rescue Service expense), through to the provision of a fire station. Clearly, these items are at different ends of the cost spectrum for initial capital outlay; however we must raise the matter of 'ongoing' financial impact that the Fire and Rescue Service would incur, and would be expected to find from existing budgets - i.e service regimes and staffing etc.**

**Without detailing the complexities of the Fire and Rescue Service funding formula in this submission, it is fair to say that the ongoing costs (Post CIL) could become disproportionate over time.**

**(Appendix One of the document 'CIL context and background' – specifies the distinction between Section 106 applications i.e fire hydrants and the applicability of CIL items such as Fire stations etc. We welcome the distinction between the two items but would still reiterate the challenges presented by ongoing funding once Fire and Rescue Service infrastructure is in place).**

**We would welcome a response on how post CIL cost would be covered within the current funding formula?**

**We believe Fire and Rescue Service developments i.e the building of new stations and facilities should not be liable for payment of the levy. The grounds for our position are that we are a non commercial entity providing a community service. As a consequence we believe the levy should be £0 / metre for Fire and Rescue Service structures i.e the approach adopted for community use – our response at 9a & 10a refers.**

**We understand that the analysis for the Joint Core Strategy was conducted by ACOM (formerly EDOR), and that the Fire Service, at that time (circa 2008) had not raised the potential for Fire and Rescue Service accommodation in the GNDP area.**



However the Service is minded to direct you to our interpretation of community infrastructure. In context we have listed below the areas (in addition to potential new fire station development and land cost), we believe would be in scope for CIL funding from the GNDP:-

1. Domestic Sprinkler systems - saving life and property.
2. Commercial sprinkler systems - saving life, property and preventing economic and environmental compromise ( i.e loss of industry and jobs in the community).
3. Provision of adequate water supplies for effective fire fighting.
4. Provision of fire fighting appliances.
5. Associated operational IT infrastructure.
6. Personnel recruitment.
7. Training.
8. Personal protective equipment.
9. Increase in community safety initiatives.
10. Increase in technical fire safety costs.

We would request that the above items are considered within the costing model used in determining the CIL cost proposals in your consultation. If this is not the case we believe you may wish to reconsider your costing model in view of our comments above.

My answer applies to: (please mark one or more of the boxes):

Broadland ☐      Norwich ☐      South Norfolk ☐      All ☒

For paper copies of this form please email [cil@gndp.org.uk](mailto:cil@gndp.org.uk) or telephone 01603 430144

**Please return the form to:**

Email: [cil@gndp.org.uk](mailto:cil@gndp.org.uk)

Post: Greater Norwich Development Partnership  
PO Box 3466  
Norwich  
NR7 0NX

**OFFICE USE ONLY:**

Date received:

Representation no:

Forms can also be delivered by hand to:

to your local district council office or to the County Council:

- Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Norwich NR7 0DU
- Norwich City Council, City Hall, St Peter's Street, Norwich, NR2 1NH
- South Norfolk Council, South Norfolk House, Swan Lane, Long Stratton, NR15 2XE

**ALL FORMS MUST BE RECEIVED BY 5PM ON MONDAY 14 NOVEMBER 2011**

For more information or if you require this document in another format or language, please contact the GNDP:

**email:**    [cil@gndp.org.uk](mailto:cil@gndp.org.uk)  
**tel:**       01603 430144

