

Draft Charging Schedules for Broadland, Norwich and South Norfolk:
Representations Form and Guidance Notes

The preparation of the Community Infrastructure Levy is a public process and your full representation will be made public for this purpose.	<i>For office use only:</i>
	<i>Date received:</i>
	<i>Rep no:</i>

Greater Norwich Development Partnership

Community Infrastructure Levy Draft Charging Schedules for Broadland, Norwich and South Norfolk

Representations Form

Please return to:

By email: cil@gndp.org.uk

By post: Greater Norwich Development Partnership
PO Box 3466
Norwich
NR7 0DU

All comments must be received by 5pm on Monday 5 March 2012

Please read the Statement of Representations Procedure and Guidance Notes before you complete this form.

1. Personal details:

**If an agent is appointed, please complete only the Title and Name boxes in column 1 below, but complete the full contact details of the agent in column 2.*

Title

First name

Last name

Job title

Organisation

Address

Postcode

Telephone no.

2. Agents details (if applicable)

Email address

Cassie.fountain@peacockandsmith.co.uk

Q1. Do you consider the Council(s) has followed a correct approach in developing the Draft Charging Schedule as required by the Community Infrastructure Levy Regulations 2010 (as amended)?

Yes No

I would like my representation to be considered for (please tick all that apply):

Broadland District Council's Draft Charging Schedule.....

Norwich City Council's Draft Charging Schedule.....

South Norfolk Council's Draft Charging Schedule.....

If no:

a. Did you raise this issue at the Preliminary Draft Charging Schedule Consultation Stage?

Yes No

b. Please give details of what change(s) you consider are necessary, having regard to the legal requirements for a charging schedule and, if not raised previously, why not. You will need to say why you think this change will make the Draft Charging Schedule legally compliant. It will be very helpful if you could also put forward your suggested revised wording of any text. Please note your comment should briefly cover all the information, evidence and supporting information necessary to support or justify the representation and the suggested change as, after this stage, further submissions will only be possible at the request of the examiner, based on the matters and issues he/she identifies for examination. Please be as precise as possible. Only information that relates to the representation will be accepted.

Please add your comments here

We wish to reiterate our previous comments.

In particular, we object to:

The significantly lower CIL rate for retail developments below 2,000 sq.m compared to those above that threshold. This will unreasonably favour smaller scale retail developments over larger which goes beyond viability concerns and conflicts with national guidance. Having two rates for new retail development of different sizes is not reasonable or properly justified. A single rate for new retail development over 100 sq.m should be used instead.

The proposed CIL rate of £135 per sq.m for new retail developments over 2,000 sq.m is very high, and for a large foodstore (of around 7,400sq.m) will result in a CIL charge of around £1m which is excessive. A levy of this level is likely to render future large-scale retail developments unviable, particularly when taking into account other costs for local infrastructure works and other contributions required as part of typical S106 Agreements (eg highways works).

It is therefore recommended that one CIL rate should be set for all retail development of over 100 sq. m and that the charging level should be amended, and full justification for the new figure should be given to ensure that all relevant factors have been taken into consideration.

Q2. Please state in the table below which part of the Draft Charging Schedule(s) you have further comment on.

I would like my representation to be considered for (please tick):

Broadland District Council's Draft Charging Schedule..... **X**

Norwich City Council's Draft Charging Schedule..... **X**

South Norfolk Council's Draft Charging Schedule..... **X**

Paragraph e.g. 1.1	Comment
<i>Please enter the paragraph number here</i>	<i>Please enter your comment here</i>
4.	One rate for all retail development above 100 sq.m should be imposed, and the rate reduced to take all relevant factors (such as anticipated S106 contributions) into account.

Supporting documents

You can support your comment with documents. Please refer to the guidance notes if you wish to submit documents. Please list any documents that you are sending to support your comment.

<i>Please add your comments here</i>

Notification requests

In line with the Statement of Representations procedure, please indicate if you wish to be:

- heard by the Examiner
- notified that the Draft Charging Schedule has been submitted to the Examiner in accordance with Section 212 of the Planning Act 2008
- notified of the publication of the recommendations of the Examiner and the reasons for those recommendations
- notified of the approval of the Charging Schedule by the Charging Authority(s)

Signature:

Signature: 	Date: 5/3/2012
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NB: A signature is not required on forms returned electronically

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