Norwich and Norfolk Transport Action Group

The Greater Norwich Development Partnership By email

14 November 2011

Dear GNDP,

Community Infrastructure Levy Regulations 2011 Preliminary Draft Charging Schedule Consultation

The Norwich and Norfolk Transport Action Group objects to the proposed rates set out in the Charging Schedule for Broadland, Norwich and South Norfolk on the grounds that the amount of Community Infrastructure Levy which the GNDP anticipates raising will be insufficient to pay for essential infrastructure projects in addition to a proposed Norwich Northern Distributor Road, a scheme to which NNTAG objects.

The estimated cost of a three quarters NDR between A47 Postwick Interchange and A1067 has risen from £110 million in the Proposed Submission Joint Core Strategy to £157.5 million (a 40% increase). The latter higher figure is as follows:

- £112.5 m cost of a half NDR route (£90.5m Government funding; £4m Growth Point; £22m local authority).
- plus £45m cost of NDR extension between A140 and A1067 to be funded by local authority Prudential Borrowing and Community Infrastructure Levy.

The GNDP regards a NDR scheme as a Priority One infrastructure project for funding. Its CIL Background and Context report states, "A future CIL examination should not reopen infrastructure planning that has already been submitted in support of a sound core strategy." (3.5)

However, the implication is that funding the NDR would absorb a higher proportion of CIL funding in the early phases of development (in region of £50m) which would leave less funding for essential infrastructure. The only solution is to increase the CIL rate for all types of development. We recommend that the CIL rates are increased in the Broadland District council area through which the NDR route would pass.

Yours faithfully, Denise Carlo, policy adviser to NNTAG