

Norwich City Council  
Planning Department  
City Hall St. Peters Street  
Norwich  
Norfolk  
NR2 1NH

**Our ref:** AE/2006/000017/OR-02/IS1-L01

**Date:** 14 November 2011

Dear Sir/Madam

**Community Infrastructure Levy Regulations 2011 (amended)  
Preliminary Draft Charging Schedule Consultation**

Thank you for inviting us to comment on the above consultation document.

We understand that the final charging schedule will lead to the production of a 'Regulation 123 List' under CIL Regulations which will set out the specific infrastructure to be funded/part funded by CIL. We would welcome the opportunity to provide input, particularly into the production of the 'Regulation 123 list', but also into any future review of the LIPP.

We note that appendix 1 of the 'Background and Context' consultation document includes an indication of the categories of infrastructure currently intended to be funded/part funded by CIL. We support the inclusion of the following general infrastructure types: green infrastructure, waste recycling, renewable energy, flood prevention and drainage, and utilities.

Flood prevention and surface water drainage

It appears that there may be an expectation that future flood defences are likely to be fully funded through the Environment Agency. It should be noted that this may not necessarily be the case and further/additional sources of funding may be required. In particular, it should be noted that we are unable to fund defences specifically required for future development proposals.

There may be flood defence/prevention schemes with the potential to be CIL funded/part funded. This is currently subject to discussion internally. We would welcome further discussion on any potential schemes when you begin to draft your Regulation 123 list/review your LIPP.

Information on Environment Agency Anglian Region flood risk and coastal management schemes that have confirmed funding in 2011/12 and indicative funding up to 2015/16 has been placed on our web site - see web link below.

<http://www.environment-agency.gov.uk/research/planning/118129.aspx>

You may wish to discuss the issue of surface water drainage infrastructure with the relevant officer at the Lead Local Flood Authority. We are aware that there is a draft Surface Water Management Plan (SWMP) for the Norwich area. The SWMP recommends that a number of actions are required to manage surface water within Norwich more effectively. These can be found within appendix D. The SWMP suggests that its findings should be a source of evidence for future infrastructure planning and reviews of the LIPP. We therefore recommend that the outputs of the SWMP are considered when planning future infrastructure.

#### Wastewater/water infrastructure

We recommend that discussions with the Water Company continue to determine where water infrastructure is required and the appropriate funding mechanism for that infrastructure.


#### Green Infrastructure

We are supportive of all forms of green infrastructure particularly as they can often provide multiple benefits such as habitat creation, water quality improvements, surface water drainage etc.


Further, we draw your attention to Regulation 17 of the Water Environment (WFD)(E&W) Regulations 2003 which places a duty on each public body, including local planning authorities, to 'have regard to' river basin management plans (RBMP). Indeed, we note that it has already been highlighted within the LIPP that development must support the Anglian RBMP actions to protect/improve water quality. We therefore recommend that you consider whether WFD improvements can be achieved through the provision of green infrastructure. At this time, it is difficult to provide further guidance on this matter. However, as more information becomes available we would be happy to participate in further discussions through the drafting, or reviews, of your Reg123 list or through reviews of your LIPP.

We hope that our comments are helpful to you. We look forward to future discussions with you on this matter.

Yours faithfully



**Miss Jessica Bowden**  
**Planning Liaison Officer**



End