DCS007_BrecklandCouncil

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Levy is a public process and your full representation will be made public for this purpose.	Date received:
	Rep no:

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:		2. Agents details (if applicable)
0 11 11	ase complete only the Title and Name boxes lete the full contact details of the agent in	
Title	Mr	Mr
First name	David	Phil
Last name	Spencer	Mileham
Job title	Deputy Planning Manager	Senior Planning Policy Officer
Organisation	Breckland Council	Capita Symonds
Address	Elizabeth House, Walpole Loke, Dereham, Norfolk	Elizabeth House, Walpole Loke, Dereham, Norfolk
Postcode	NR19 1EE	NR19 1EE
Telephone no.	(01362) 656803	(01362) 656303

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

Email address	David.spencer@breckland-	Philip.mileham@capita.co.uk
	sholland.gov.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)?

Regulat	ions 2	2010 (a	is amended)?	
Yes	✓	No		
l would apply):	like	my rep	resentation to be considered for (ple	ase tick all that
Broadla	nd Di	strict C	ouncil's Draft Charging Schedule	✓
Norwich	City	Counc	il's Draft Charging Schedule	🗖
South N	lorfolk	Coun	cil's Draft Charging Schedule	✓
If no:				
			41.1 (4 D II.1 D (60)	

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

Charging Schedule

Breckland Council made representations on the GNDP's preliminary draft Charging Schedule at the previous consultation stage in November 2011. The Council raised a number of concerns at this time relating to the rate of charge in the charging zones of South Norfolk and Broadland Council's administrative areas which adjoin the boundary with Breckland District. The settlements of Wymondham and Attleborough are identified in respective Core Strategies for major growth (2,000 and 4,000 new homes respectively) and CIL revenues from this growth will clearly form a key funding source for the infrastructure needed to underpin the growth plans.

Breckland Council welcomes the reduction in the CIL charge for residential development in Zone A (insofar as it extends to Wymondham which borders Attleborough) from the previous iteration of your Charging Schedule. Breckland Council's initial assessment of potential CIL in this area indicates that a figure of around £100 per sqm could be achieved, which taking into account variances in land values

and affordable housing contributions, is broadly comparable.

However, the Council does consider it surprising that some seemingly high value areas are still included in Zone B, which attracts a lower residential CIL charge. The Council has previously drawn your attention to this issue at the last consultation stage. This is due to the potential for locations such as Reepham, Hingham and Foulsham which, like some higher value villages in the east of Breckland, could potentially support a slightly higher rate of CIL (even taking into account Breckland Council's higher affordable housing rate at 40%).

The supporting information below is expressed as average sales values per square metre and taken from the 'Hometrack' system, with data 'live' as at November 2011. The tables illustrate the point that sales values in the GNDP's Zone B areas adjoining the border could be considered broadly comparable to rates for places such as Wymondham (particularly Town, Northfields Abbey and Rustens Wards) which are part of Zone A.

Hingham & Deopham

	New propert y average	New Build Premiu m	All sales - £/m2	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sales - £/m2
200	N/A	N/A	£1,85	£1,560	£1,89	£1,832	£1,91
7			1 (65)	(1)	7 (22)	(36)	6 (3)
200	£216,12	-4% (8)	£1,75	N/A	£1,83	£1,681	N/A
8	5 (8)		4 (39)		7 (15)	(23)	
200	£169,77	-25%	£2,01	£1,741	£1,83	£2,209	N/A
9	9 (16)	(16)	6 (49)	(10)	1 (20)	(18)	
201	£147,00	-37% (2)	£1,83	£1,159	£1,76	£1,969	N/A
0	0 (2)		0 (46)	(5)	0 (10)	(25)	
201	£140,00	-34% (1)	£1,68	£1,537	£1,67	£1,824	£1,22
1	0 (1)		9 (41)	(4)	9 (14)	(21)	4 (1)

Eynesford*

	New propert	New Build Premiu	All sales	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sale s -
	average	m	£/m2	- 2/1112	_ ~/1112	2/1112	£/m2
200 7	£300,00 0 (1)	31% (1)	£1,66 1 (59)	£1,665 (11)	£1,55 5 (19)	£1,818 (25)	N/A
200 8	£100,00 0 (1)	-47% (1)	£1,76 3 (27)	£1,948 (10)	£1,41 3 (8)	£2,178 (7)	N/A
200 9	£206,16 5 (12)	15% (12)	£1,50 8 (29)	£1,534 (4)	£1,72 4 (6)	£1,396 (19)	N/A
201 0	£216,02 0 (12)	0% (12)	£1,53 8 (49)	£1,525 (13)	£1,30 6 (9)	£1,685 (27)	N/A
201 1	N/A	N/A	£1,58 9 (23)	N/A	£1,44 8 (8)	£1,594 (12)	N/A

^{*}Eynesford Ward - Broadland - containing Foulsham

Reepham

	New propert y average	New Build Premiu m	All sales - £/m2	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sale s - £/m2
200 7	£230,00 (1)	1% (1)	£1,80 8 (46)	£1,640 (2)	£2,07 1 (13)	£1,729 (30)	N/A
200 8	N/A	N/A	£1,99 5 (32)	£1,627 (5)	£2,05 9 (7)	£2,214 (16)	N/A
200 9	£233,55 0 (7)	10% (7)	£1,58 9 (41)	£1,845 (1)	£1,59 1 (7)	£1,564 (27)	N/A
201 0	£214,97 2 (9)	4% (9)	£1,76 8 (59)	£1,753 (8)	£1,38 3 (14)	£1,788 (31)	N/A
201 1	£195,83 3 (3)	-15% (3)	£1,71 0 (37)	£1,646 (5)	£1,49 1 (9)	£1,796 (23)	N/A

Wymondham - Rustens

	New propert y average	New Build Premiu m	All sales - £/m2	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sales - £/m2
200	£219,29	4% (27)	£1,88	£1,924	£1,83	£1,795	£2,05
7	6 (27)		7 (99)	(13)	4 (27)	(42)	8 (17)
200	£183,60	1% (20)	£1,90	£1,734	£2,17	£2,157	£2,03
8	5 (20)		8 (51)	(12)	7 (19)	(12)	5 (8)
200	£185,44	11% (49)	£1,49	£1,457	£1,55	£1,458	£1,63
9	7 (49)		3 (75)	(31)	5 (22)	(20)	9 (2)
201	£202,02	-7% (37)	£1,72	£1,321	£2,10	£1,633	£1,71
0	7 (37)		1 (62)	(15)	0 (21)	(23)	8 (3)
201 1	£252,60 0 (5)	56% (5)	£1,66 6 (41)	£1,648 (9)	£1,67 4 (18)	£1,667 (13)	N/A

Wymondham - Northfields

	New propert y average	New Build Premiu m	All sales - £/m2	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sales - £/m2
200 7	N/A	N/A	£2,04 4 (53)	£1,965 (11)	£1,72 7 (17)	£2,294 (20)	£2,61 1 (3)
200 8	N/A	N/A	£2,00 6 (39)	£2,529 (10)	£1,72 4 (12)	£1,901 (1)	£2,07 3 (1)
200 9	N/A	N/A	£1,71 5 (34)	£1,638 (7)	£1,53 2 (8)	£1,888 (15)	N/A
201 0	N/A	N/A	£1,68 8 (33)	£1,608 (6)	£1,50 4 (13)	£1,856 (11)	N/A
201 1	N/A	N/A	£1,78 5 (33)	£1,767 (9)	£1,80 0 (10)	£1,790 (13)	N/A

Wymondham - Abbey

•	New propert y average	New Build Premiu m	All sales - £/m2	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sales - £/m2
200	£135,00	-28% (1)	£2,08	£1,982	£2,31	£2,032	£1,29
7	0 (1)		5 (74)	(26)	2 (20)	(32)	1 (13)

200	N/A	N/A	£1,65	£1,768	£1,42	£1,729	N/A
8			1 (50)	(11)	9 (15)	(19)	
200	N/A	N/A	£1,66	£1,696	£1,55	£1,965	£2,04
9			5 (47)	(14)	7 (15)	(11)	1 (2)
201	£300,00	47% (1)	£1,85	£1,811	£1,69	£2,395	£1,33
0	0 (1)		2 (52)	(11)	7 (17)	(16)	7 (2)
201	N/A	N/A	£1,99	£1,852	£2,64	£1,741	N/A
1			7 (32)	(9)	3 (2)	(16)	

Wymondham - Town

	New propert y average	New Build Premiu m	All sales - £/m2	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sales - £/m2
200 7	£249,95 0 (1)	16% (1)	£1,94 2 (80)	£1,707 (6)	£2,02 1 (27)	£1,936 (42)	£2,11 7 (2)
200 8	N/A	N/A	£1,86 3 (43)	£1,869 (8)	£1,98 1 (14)	£1,733 (17)	£1,87 2 (4)
200 9	N/A	N/A	£1,68 8 (49)	£1,681 (5)	£1,66 9 (20)	£1,667 (24)	N/A
201 0	N/A	N/A	£1,69 6 (60)	£1,564 (9)	£1,67 3 (21)	£1,750 (30)	N/A
201 1	N/A	N/A	£1,72 2 (49)	£1,585 (8)	£1,68 4 (22)	£1,775 (18)	N/A

Wymondham - Cromwells

	New propert y average	New Build Premiu m	All sales - £/m2	Terrac e sales - £/m2	Semi sales - £/m2	Detache d sales - £/m2	Flat sales - £/m2
200 7	£208,07 3 (15)	-18% (15)	£1,85 4 (68)	£1,770 (22)	£1,73 9 (17)	£1,953 (23)	£2,14 2 (6)
200 8	£156, 250 (2)	-44% (2)	£2,23 7 (19)	£2,333 (5)	£1,81 2 (7)	£2,153 (6)	N/A
200 9	N/A	N/A	£1,78 0 (26)	£1,898 (5)	£1,65 4 (8)	£1,770 (13)	N/A
201 0	N/A	N/A	£1,73 5 (32)	£1,725 (12)	£1,38 2 (10)	£2,032 (8)	N/A
201 1	£169,69 6 (5)	-23% (5)	£1,84 6 (33)	£1,241 (7)	£1,73 5 (14)	£2,115 (12)	N/A

Therefore, as can be seen from the above tables, despite low sample sizes in some specific categories, the Council considers that there could be a case for increasing the CIL rate in areas adjoining the border with Breckland such as Hingham without jeopardising viability. However, it should be noted that the 'New build Premium' column has been derived from valuations and sales figures and should be treated with relative caution. Notwithstanding this point, this column could aid the understanding as to whether there are anomalous values due to new developments coming to the market which would affect average sales prices, and consequently the ability of development to support a particular CIL rate.

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Therefore, whilst Breckland Council does not consider that the rate in Zone B is unsound, it is considered that the GNDP should give careful consideration as to whether there is merit in reconsidering the rate in these areas.

Staging Payments and Payments in Kind

The approach to payments in kind at section 12 is supported and represents a sound approach to dealing with this form of provision.

The Council also supports the GNDP's approach to stage payments as set out at Appendix 4 of the documentation. It is considered that such an approach to stage payments will have a positive impact on development viability and aid developer cash flow, enhancing the delivery of the proposed housing growth in the Joint Core Strategy area.

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

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

Paragraph e.g. 1.1	Comment			
Please enter the paragraph number here	Please enter your comment here			

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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.

lease add your comments here	

Notification requests

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

No heard by the Examiner

Yes notified that the Draft Charging Schedule has been submitted to the Examiner in accordance with Section 212 of the Planning Act 2008

Yes notified of the publication of the recommendations of the Examiner and the reasons for those recommendations

Yes notified of the approval of the Charging Schedule by the Charging Authority(s)

Signature:

Signature:	Date: 29.02.12		

NB: A signature is not required on forms returned electronically

Please email to cil@gndp.org.uk or post to Greater Norwich Development Partnership, PO Box 3466, Norwich, NR7 0DU