

## Community Infrastructure Levy - Draft Charging Schedule Statement of Modifications Consultation (25 July to 22 August 2016) Response Form

Please return by **5:00pm on Monday 22<sup>nd</sup> August 2016** to:

**Post:** South Worcestershire Development Plan Team  
Civic Centre  
Queen Elizabeth Drive  
Persnore  
Worcestershire  
WR10 1PT  
**Email:** [contact@swdevelopmentplan.org](mailto:contact@swdevelopmentplan.org)

**Ref:**

(For official use only)

### How we will use your details

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 1998.

Please note that your name, postal address and comments may be made publicly available when displaying and reporting the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be available in full for inspection on request.

1. Personal details		2. Agent's details (if applicable)	
Title		Mr	
Full name		Matthew Fox	
Job title (if applicable)		Associate	
Organisation (if applicable)	QinetiQ	Bilfinger GVA	
Address	Care of Bilfinger GVA	3 Brindleyplace Birmingham	
Postcode		B12JB	
Telephone number			
E-mail address			

Following consultation on the Draft Charging Schedule (DCS) in April/May 2016, a statement of modifications schedule has been produced to accompany the CIL examination submission material. The statement of modifications lists the proposed changes the SWC are seeking to make to the CIL charging schedule as a result of representations received during the DCS consultation period (schedule 1), and any other minor amendments that the SWC have identified in reviewing the draft documentation prior to submission (schedule 2).

The South Worcestershire Councils are therefore now inviting representations on the statement of modifications, prior to undertaking the CIL examination hearing sessions.

Please submit your representation by using this form and answering the questions below.

**Proposed Modification Number: PM9**

**(The PM reference numbers are located on the statement of modifications schedules)**

**Question 1: Do you agree with the proposed modification? Please continue on a separate sheet if you require further pages.**

<b>Yes</b>	
<b>No</b>	X

**Comment:**

QinetiQ welcomes PM9 insofar as it proposes to modify the Draft Charging Schedule (DCS) to replace the proposed levy rate of £40 per sq m for strategic site SWDP53 “QinetiQ Malvern” with a nil rate (£0 per sq m). This modification is proposed in response to QinetiQ’s representations to the CIL DCS which highlighted the fundamental error in the 2016 viability appraisal for this specific site (an incorrect gross land area measurement) which resulted in a flawed viability assessment, as well as the DCS’ inadvertent proposal to apply the levy to any new employment development at QinetiQ Malvern. Officers of the South Worcestershire Councils have now acknowledged these errors and have sought to address them through PM9. QinetiQ supports the modified nil rate for QinetiQ Malvern but it is apparent that PM9 proposes to incorrectly modify Table 1 (beneath para. 8.2) which deals with generic development types, rather than Table 2, which deals with the strategic sites (including SWDP53).

Having regard to the above, QinetiQ objects to PM9 on the basis that it seeks to amend the incorrect table in the DCS. It is requested that PM9 be updated to ensure that Table 2 is corrected (page 20 of the DCS) to provide a nil rate for all new development at QinetiQ Malvern.

In addition to the above, it is evident that PM9 needs to go further than simply making a change to the levy rate. This is because other aspects of the DCS need to be updated to ensure they are consistent with the nil rate:

- **Para. 8.2 Table 2** – The text within the “Comments” column for SWDP53 should be amended to read “As for “Residential – Main Urban Areas” and “Industrial and Office uses”. As currently drafted, there will be an inconsistency between the modified nil rate applicable to QinetiQ Malvern and the reference in the comments column to “Residential – All Other Areas” which currently proposes to apply a rate of £40 per sq m for sites in Malvern Hills District. It is also important to make reference to the nil rate for industrial and office development mindful that QinetiQ Malvern is allocated to deliver at least 4.5ha of B1(b) land.
- **Paras. 6.5 and 8.1** in the DCS must acknowledge that there are errors in the January 2016 viability evidence base in relation to QinetiQ Malvern. Otherwise, there is a clear and unexplained inconsistency between these paragraphs as drafted (which refer to the Charging Schedule being underpinned by the HDH viability assessment work) and Table 2, which will now apply a nil rate to QinetiQ Malvern.

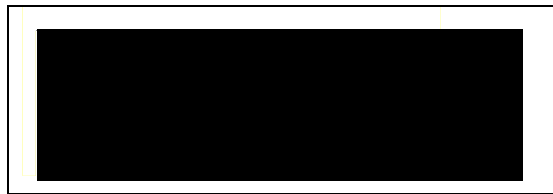
QinetiQ respectfully request that the above further modifications are made to ensure a sound CIL Charging Schedule.

**Right to be heard**

Do you wish to appear at the CIL examination?

Yes	X
No	

Signature

A rectangular box containing a solid black redaction, covering the signature area.

Date

19/08/2016
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Responses to this consultation should be sent to the e-mail contact address and/or postal address shown at the top of this form. Please ensure all responses are marked for the attention of the South Worcestershire Development Plan Team.

**Representations must be received by 5:00pm on 22 August 2016. Any representations made after that date and time will be considered “Not Duly Made” and will not be taken into account.**

Thank you for completing the form.