

Community Infrastructure Levy - Draft Charging Schedule Consultation (1 April to 16 May 2016)

Response Form

Please return by **5:00pm on Monday 16th May 2016** to:

Post: South Worcestershire Development Plan Team
Civic Centre
Queen Elizabeth Drive
Persnore
Worcestershire
WR10 1PT
Email: 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 Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be available in full for inspection on request.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

Title	
Full name	
Job title (if applicable)	
Organisation (if applicable)	
Address	
Postcode	
Telephone number	
E-mail address	

2. Agent's details (if applicable)

Mr
Tim Watton
Technical Director
RPS Planning

In parallel with the South Worcestershire Development Plan (SWDP), the South Worcestershire Councils (Worcester City, Malvern Hills and Wychavon District Councils) are synchronising the process of preparing a Community Infrastructure Levy (CIL). Following consultation on the Preliminary Draft Charging Schedule (PDCS) in February/March 2015, work to update CIL has been carried out and each authority now intends to submit a **Draft Charging Schedule (DCS)** in 2016 for Examination. The updated timetable changes are reflective of the latest Local Development Scheme timetable, which came into force on 1 October 2015.

The South Worcestershire Councils are therefore now inviting representations on the DCS, prior to submission.

Please submit your representation by using this form and answering the questions below. If you need to continue on separate sheet, please remember to state which question you are responding to.

Question 1: Do the South Worcestershire Council's Draft Charging Schedules strike an appropriate balance between the desirability of funding infrastructure from the Levy and the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across the area?

Yes	
No	

Comment: Please See Question 6

Question 2: Does the Regulation 123 list clearly and effectively set out the types of infrastructure that the South Worcestershire Councils intends will be, or may be, wholly or partly funded by CIL (or S106 agreements)?

Yes	
No	

Comment: Please See Question 6

Question 3: Do you agree with the proposed CIL rates for each of the South Worcestershire Councils?

Yes	
No	

Comment: Please See Question 6

Question 4: Do you agree with the proposed CIL rates for the specific strategic site areas?

Yes	
No	

Comment: Please See Question 6

Question 5: Do you have any views on the proposed Instalments policy?

Comment:

Question 6: Do you have any further comments to make? If so, please make your comments below, as clearly and concisely as possible. If you are referring to any particular text in the CIL DCS, please state the relevant paragraph number.

Comment:

The National Planning Practice Guidance (NPPG) makes it clear at paragraph 082 that *'charging authorities may pass money to bodies outside their area to deliver infrastructure that will benefit the development of the area. For example, these bodies may include the Environment Agency for flood defence or, in two tier areas, the county council, for education infrastructure'*.

The recently adopted SWDP makes explicit provision for potential future development on land at Mitton. Policy SWDP2 (Development Strategy and Settlement Hierarchy) states that *'...due consideration will be given, including through a review of the SWDP where appropriate, to the housing needs of other local planning authorities⁽⁶⁾ in circumstances when it has been clearly established through the local plan process that those needs must be met through provision in the SWDP area'*. Footnote 6 refers specifically to land at Mitton and confirms that the South Worcestershire Councils will continue to monitor progress with the Examination of the JCS.

The 'Mitton' land is currently being considered as an 'omission site' as part of the ongoing Joint Core Strategy (JCS) examination process. The Inspector's interim findings are expected shortly. Her Preliminary findings identified that additional land around Tewkesbury may be required, including land within Wychavon District.

"Whilst flooding is a consideration around Tewkesbury, the evidence suggests that there may be sustainable omission sites close to Tewkesbury's wider urban boundary, which are not at significant risk of flooding, are outside the GB, and are not within highly sensitive landscape areas. I invite comment from the JCS authorities only on the potential for allocating omission sites/other alternatives close to the urban edge of the wider Tewkesbury area, whether within the JCS administrative area or not" (paragraph 28 of the JCS Inspector's Preliminary Findings 18 December 2015.

We believe it would be appropriate and prudent for the South Worcestershire CIL documentation to make explicit reference to the principle of CIL monies being passed to Gloucestershire County Council and Tewkesbury Borough Council when the 'Mitton' land comes forward; in the likely event that some of the necessary supporting community and physical infrastructure will need to be delivered in Tewkesbury Borough.

Without such a principle in place, there would be a very real risk of actual or perceived 'double dipping', with the promoters of land at Mitton paying twice for the same items of infrastructure (for example, in relation to secondary education).

Comments received will be acknowledged and registered and will then be carefully considered in preparing the final documents to go forward for Examination, prior to eventual adoption and implementation by the South Worcestershire Councils.

Signature



Date

16 May 2016

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 16 May 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.



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Our Ref: JBB7404.C4476

16 May 2016

Draft CIL Consultation
South Worcestershire Development Plan
Civic Centre
Queen Elizabeth Drive
Persnore
WR10 1PT

BY EMAIL ONLY

Dear Sirs

COMMUNITY INFRASTRUCTURE LEVY – DRAFT CHARGING SCHEDULE CONSULTATION

RPS acts on behalf of Barratt West in respect land, on the eastern side of Bredon Road situated in Wychavon District known as Land at Mitton and identified on the attached Plan. It forms part of a wider proposal that includes land promoted by Carter Jonas on behalf of Mactaggart & Mickel, also identified on the attached plan. The two parcels of land could jointly provide in the order of 750 dwellings, together with land for a new primary school, commercial uses and associated open space.

The promoted land adjoins a modern housing estate (Mitton) on its south western flank, whilst to the south and east is the extensive Tewkesbury Industrial Estate. The southern and eastern boundaries are defined by Carrant Brook towards which the land slopes down from Bredon Road. The developable land is situated above the floodplain of Carrant Brook - less than a mile from Tewkesbury town centre.

The principal purpose of this letter of representation is to alert the South Worcestershire authorities to the likely future need for CIL monies to be passed to Gloucestershire County Council and Tewkesbury Borough Council to address the infrastructure needs arising from development of the 'Mitton' land.

Response

The National Planning Practice Guidance (NPPG) makes it clear at paragraph 082 that '*charging authorities may pass money to bodies outside their area to deliver infrastructure that will benefit the development of the area. For example, these bodies may include the Environment Agency for flood defence or, in two tier areas, the county council, for education infrastructure*'.

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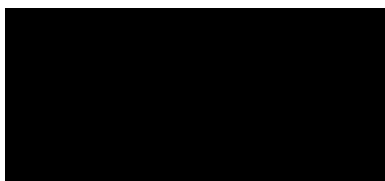
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Without such a principle in place, there would be a very real risk of actual or perceived 'double dipping', with the promoters of land at Mitton paying twice for the same items of infrastructure (for example, in relation to secondary education).

For completeness, a Response Form has been duly completed – covering the same ground as this letter.

I trust the above is clear but please do not hesitate to contact me if you have any queries.

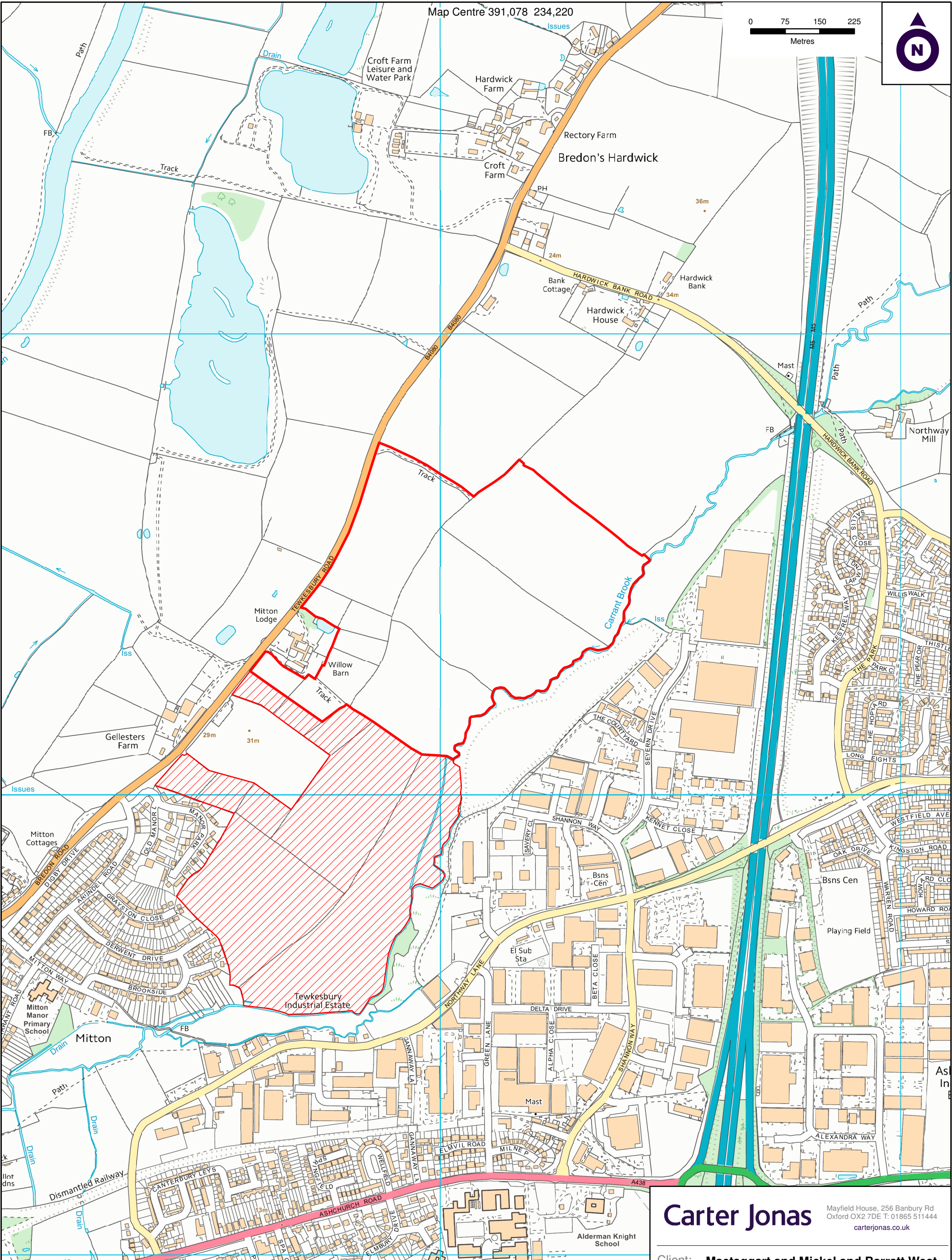
Yours faithfully



**TIM WATTON BA (Hons) Dip TP MRTPI
TECHNICAL DIRECTOR**



Enc
Site Plan
Response Form



Legend

-  Land promoted by Barratt West
-  Land owned by Croome Estate Trustees and promoted by Mactaggart & Mickel

Carter Jonas

Mayfield House, 256 Banbury Rd
Oxford OX2 7DE T: 01865 511444
carterjonas.co.uk

Client: **Mactaggart and Mickel and Barratt West**
Project: **Land east of Bredon Road, Tewkesbury**

Title: **Site Location Plan**

Scale: 1:7500 @A3 Date: 13 May 2016
Drawn by: GY Dwg no: **OX63074-12-01a**