

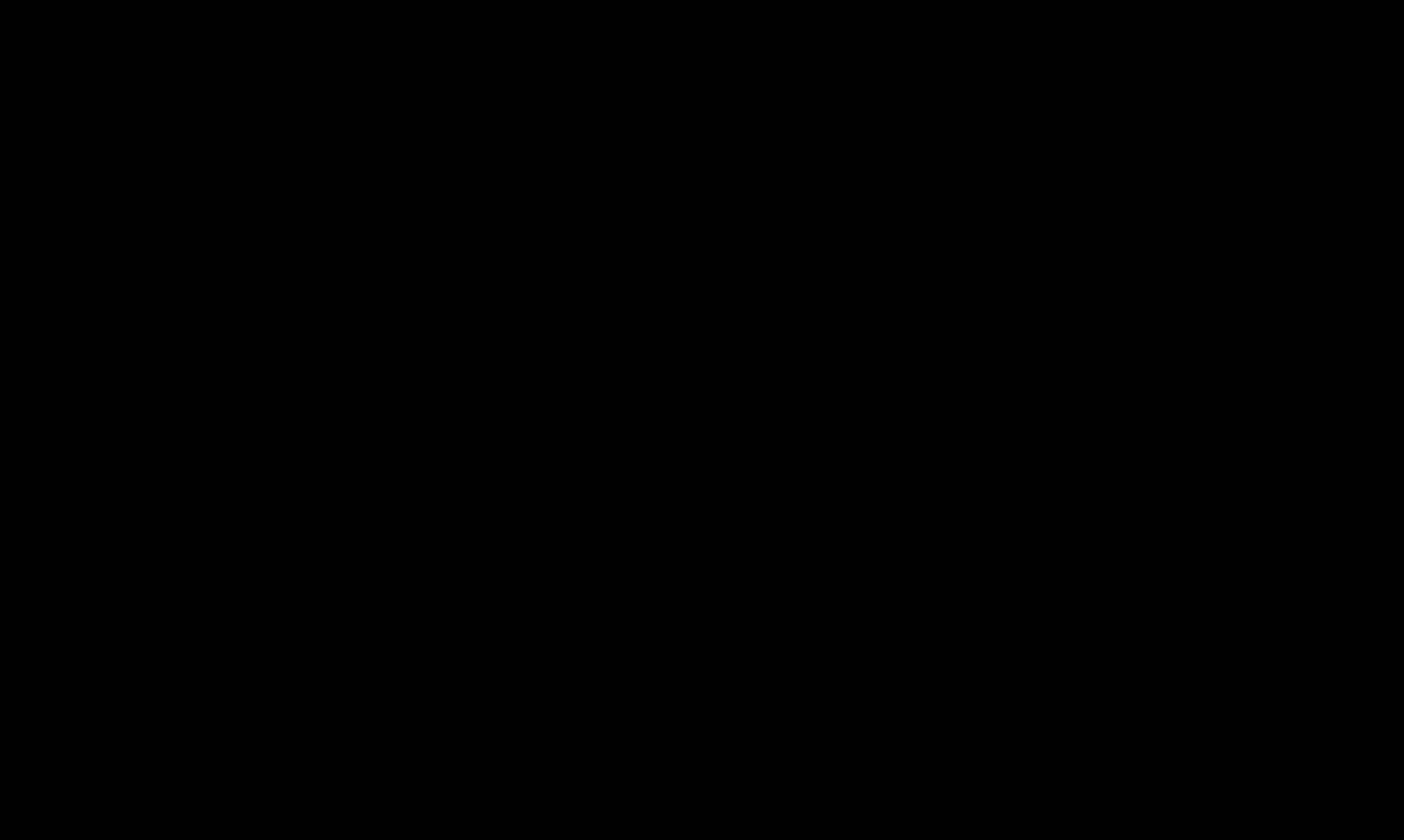
CIL Submission Charging Schedule Consultation

submitted on Wed Nov 2015 at 13:35

User details

Name: john deegan

Address:



Representation (Agents Only)

Are you an agent representing a third party? **Yes**

Representing: The Stratford Society

Address:

Telephone:

Email:

Notification of subsequent stages of the Community Infrastructure Levy (CIL)

Notify Me of the Following;

Submission of the Charging Schedule for independent examination: **YES**

Publication of the recommendations of the person appointed to carry out an independent examination of the Submission Charging Schedule: **YES**

Adoption of the Community Infrastructure Levy: **YES**

Your Comments

Have you commented on any previous Planning Policy Consultations? **Yes**

Nature of comment **Comment**

Comments

Points made in the Society's responses to earlier consultations, which still seem to be valid are as follows: a) Employment land continues to be outside the scope of CIL for no good reason. If there is an issue over its impact on economic viability, then it should be zero rated and not exempt.

b) It is still not proposed that CIL be charged on extensions to the currently defined town centre area, which could be damaging to established retailers.

c) Although the Council proposes phased payments on strategic sites, it is still unclear what the baseline date is and therefore how, if at all, the economic viability of development would be affected.

d) No decision has yet been taken on discretionary exceptions to the charge. The Society has already expressed a view that there is no reason generally to extend exemptions to investment properties held by charities, or to specific schemes which "can't afford to pay". However, in the proposed canal quarter the Council should keep under review the proposed CIL charge (£85psm) in order to ensure its deliverability over the plan period.

e) There still appears to be no proposal for review of CIL rates, even though inflation generally and land prices in particular will change over time and quickly render the charging schedules out-of-date.

On the positive side, the proposed draft Regulation 123 list (which should include those projects or type of infrastructure to be wholly or partly funded via CIL) is now much clearer than in earlier drafts and should not be controversial. Clearly there may be new issues arising as the Housing and Planning Bill makes its progress through Parliament but no doubt the Council will be monitoring this.

The Examination

Yes, I wish to participate at the oral Examination