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North Dorset Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule Consultation 24 July to 18 September 2015

Response Form

A preliminary draft charging schedule has been developed by the Council. This sets out the proposed charging rates for North Dorset and comments are now invited on the preliminary draft charging schedule. The consultation period starts on 24 July 2015 and ends on 18 September 2015. The consultation document and all supporting documentation can be viewed on the Council's web page below:

<https://www.dorsetforyou.com/northdorsetcil>

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Deadline: Midnight on 18 September 2015. Representations received after this time may not be accepted.

Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title	Mrs	
First Name	Gill	
Last Name	Smith	
Job Title(<i>where relevant</i>)	Senior Planning Officer	
Organisation (<i>where relevant</i>)	████████████████████	
Address	██████████ ████████████████████	
Postcode	██████	
Tel. No.	██████████	
Email Address	████████████████████	

Part B – Representation

1. Do you agree that the evidence provided by Peter Brett Associates in their viability report and other supporting evidence is correct?

No – See below

2. Do you agree that the CIL rates proposed (per square metre) strike an appropriate balance between the desirability of funding infrastructure through CIL and associated economic viability?

No – See below

3. Do you believe that the Council should offer relief for any of the following discretionary matters?

- Payment by installments (and what should these be?)
- Relief for low cost market housing
- Land and Infrastructure in-kind
- Relief for exceptional circumstances
- Relief for charitable investment activities

No Comment

4. Do you have any views on the content of the Council's Preliminary Draft Regulation 123 list and the proposed balance between CIL and S106?

See below

5. Your Comments.

Please provide alternative evidence or reasoning to support your view where necessary.

General Comment

As a major provider of infrastructure in the area, Dorset County Council welcomes the publication of the Preliminary Draft Charging Schedule as the first stage in preparing a Community Infrastructure Levy (CIL) for North Dorset. In view of the large funding gap of just under £95 million between the cost of infrastructure needed to support the policies of the North Dorset Local Plan and the funding otherwise available, a CIL charge will be essential.

Dorset County Council also welcomes the statement in paragraph 2.17 of the consultation document that, whilst the governance and prioritisation of future CIL spend is the responsibility of North Dorset District Council, "in practice (and in line with statutory guidance) prioritisation of projects will need to be undertaken in partnership with other infrastructure providers, including Dorset County Council." We welcome the opportunity to work with North Dorset on the appropriate allocation of the resources available.

We set out below our response to the questions in the consultation document:

1) Do you agree that the evidence provided by PBA in the viability report and other supporting evidence is correct? If not, please set out alternative evidence to support your view.

Dorset County Council is concerned that the evidence provided by Peter Brett Associates¹ is based on policies that, whilst relevant at the time that the study was being prepared, have since been superseded by proposed changes to the North Dorset Local Plan Part 1 introduced following the examination hearing, as well as by changes to government policy in respect of affordable housing requirements on small sites following a High Court ruling.

In order to properly understand the full implications on viability of the changes outlined above, the data should be re-worked. The relevant figures for total housing provision and proportions of affordable housing identified in the proposed Modifications to the Local Plan should be used in the calculations. Also, should North Dorset District Council be minded to reconsider the proposed changes to its affordable housing policy that it had introduced in direct response to the Government's requirement on site size thresholds, this will also have implications for the viability of smaller sites and appropriate adjustments should be made to the calculations.

2) Do you agree that the CIL Rates proposed (per square metre) strike an appropriate balance between the desirability of funding infrastructure through CIL and associated economic viability? If not, please set out alternative evidence to support your view.

Bearing in mind our response to question 1 above, it may be premature to comment on the appropriateness of the proposed CIL rates in view of the need to update the evidence. However a provisional view is that the proposed rates appear low, especially when compared to those in neighbouring authorities.

While it is appreciated that residual land values will vary between and within Districts, it is noted that the highest CIL charge in North Dorset of £45 per sq metre is well below that for Portland, where land values are amongst the lowest in Dorset. The CIL charges for Portland (£80psm), Weymouth (£93psm) and the rest of West Dorset (£100psm) have recently been examined and have been found sound. This raises concerns that the assessments may not be compatible and could result in inappropriately low charges in North Dorset. Bearing in mind the large funding gap that exists, it is essential that realistic CIL charges are set in order that, as the NPPF requires, "*there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.*"²

We question whether the larger sites identified for housing growth in the North Dorset Local Plan Part 1, where infrastructure provision is critical to the development, should be excluded from CIL charges and should instead rely entirely on Section 106 agreements. This approach has been used by several other authorities in Dorset, including Christchurch, East Dorset, West Dorset and Weymouth and Portland as it provides more certainty over the provision of infrastructure on the large sites. It should also simplify the calculation of a CIL charge on all other sites. As a major provider of infrastructure the County Council is concerned that, as far as possible, CIL charges across the County are comparable and that they maximise the income from CIL to close the gap as far as reasonably possible without compromising development viability.

¹ North Dorset Whole Plan viability and CIL Study 2015. Peter Brett Associates

² National Planning Policy Framework para 177.

Other comments

In respect of the Preliminary Draft Charging Schedule (para 4.3) it is requested that Plans are provided to clarify the boundaries of the individual towns, Gillingham Southern Extension and the other locations.

In respect of the Draft Regulation 123 List we would request that libraries are specifically listed under “Community Facilities”.

Signature: G Smith

Date: 16.09.2015_

If submitting the form electronically, no signature is required.