

## CIL Draft Charging Schedule Response Form 2015

For Official Use Only
Ref:
Rep. Ref.

Please use this form if you wish to support or object to the Community Infrastructure Levy – Draft Charging Schedule. If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available (see back page). You can also respond online using the LDP Consultation System, visit: [www.warwickdc.gov.uk/planning](http://www.warwickdc.gov.uk/planning)

### Part A - Personal Details

1. Personal Details

2. Agent's Details (if applicable)

Title	Mr	
First Name	Colin	
Last Name	Blundel	
Job Title (where relevant)	Strategic Planner	
Organisation (where relevant)	Warwickshire Police / West Mercia Police	
Address Line 1	Estate Services HQ	
Address Line 2	Hindlip Hall	
Address Line 3	PO Box 55	
Address Line 4	Worcester	
Postcode	WR3 8SP	
Telephone number	01905 332885	
Email address	colin.blundel@westmercia.pnn.police.uk	

Would you like to be made aware of future updates on the CIL?  Yes  No

About You: Gender

Ethnic Origin

Age  Under 16  16 - 24  25 - 34  35 - 44

**45 - 54**  55 - 64  65+

**Notifications**

Please specify whether you wish to be notified of any of the following:

- 1. Submission of the Draft Charging Schedule for examination  Yes  No
- 2. Examiner's Report  Yes  No
- 3. Council approval of Charging Schedule  Yes  No

# Part B - Commenting on the CIL Draft Charging

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of

Which part of the document are you responding to?

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

- Under paragraph 1.5, the continued use of Section 106 agreements is welcome as this will have potential to continue to provide funding for police infrastructure costs that are directly related to the new development. The Schedule does not address the potential implications of the restrictions on the pooling of Section 106 contributions. In particular the document should outline how these restrictions will be operated in practice and whether there is potential to address some of these infrastructure requirements and generate sufficient funding through CIL.
- In calculating the CIL charge and balancing this with viability, as set out under paragraphs 1.7 to 1.11, it is essential to be clear which elements of infrastructure are to be funded through CIL and which through Section 106 agreements.

# Part B - Commenting on the CIL Draft Charging

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of

Which part of the document are you responding to?

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

- Warwickshire Police (WP) and West Mercia Police (WMP) welcome the inclusion of emergency services under paragraph 2.2 of the policy, reflecting the findings of the Infrastructure Delivery Plan. It is, however unclear from this which elements of emergency services infrastructure will be covered by CIL and which will continue to be collected through S106 contributions. This needs to be clearly set out in the Regulation 123 list.
- WP/WMP are currently working on a Strategic Infrastructure Assessment for Warwick and Stratford Districts, which will help to inform police infrastructure requirements across South Warwickshire.

# Part B - Commenting on the CIL Draft Charging

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of

Which part of the document are you responding to?

Section 5 – Proposed CIL Charging Rates

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

- The larger Strategic Sites as referred to in paragraph 5.2 are likely to be those where there is most demand for increased police presence and therefore new infrastructure. If there are to be reduced CIL payments for these sites it needs to be clear from the schedule that S106 payments would be required towards on-site infrastructure, including police infrastructure.
- The charging rates are set at quite a cautious level, which is acceptable as long as S106 agreements continue to be used as the main funding source for police infrastructure. However, the Regulation 123 list needs to clearly demonstrate those items to be funded through CIL and S106 and there needs to be a clear approach across the District to deal with the restrictions on pooling of S106 contributions. We consider that the current wording in the Draft Regulation 123 List relating to 'Police equipment and other costs' is much too vague and may jeopardise future requests from the police for site-specific funding through S106. With the rates set at a cautious level it seems very unlikely that CIL would produce the levels of contributions identified (£1 million) in the Draft Regulation 123 List. As the 'police equipment and other costs' would be likely to relate to specific sites, we would wish to see this aspect removed from the Draft Regulation 123 List and to continue to be funded through S106. The Police Custody Suite should continue to be funded through CIL.

# Part B - Commenting on the CIL Draft Charging

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of

Which part of the document are you responding to?

Section 6 – Exemptions and Payment Terms

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

- Infrastructure cannot be delivered incrementally ie small sections of a road or a police station cannot be built in isolation. Developers should be factoring this in as part of their calculations. With an installment policy the risk is that a given scheme will get all of the benefits of particular infrastructure, but share only limited costs.
- Payments for police infrastructure such as police offices, officer training, vehicles and ANPR will need to be payable prior to occupation of the dwellings. As these would be capital costs, it would not normally be feasible for these to be paid in installments.

## Part B - Commenting on the CIL Draft Charging

---

If you are commenting on multiple sections of the document, you will need to complete a separate sheet for each representation

Sheet  of

### CIL Examination : Right to be Heard

---

Do you wish to be heard by the Examiner at the examination?  Yes  No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: