

# **West Northamptonshire Community Infrastructure Levies**

## **Draft Charging Schedule Consultations**

### **Statement of Community Engagement and Consultation**

**November 2014**



## Contents

<b>Section</b>	<b>Sub Section</b>	<b>Content</b>	<b>Page Number</b>
<b>1.0</b>		<b>Introduction</b>	<b>1</b>
	1.1	Purpose of this Statement	1
	1.2	Background	1
	1.3	The West Northamptonshire Joint Core Strategy	2
<b>2.0</b>		<b>Consultations</b>	<b>3</b>
	2.1	The Preliminary Draft Charging Schedule Consultations	3
	2.2	The Consultation Process	3
	2.3	The Draft Charging Schedule Consultations	3
	2.4	The Consultation Process	3
	2.5	Results of the Draft Charging Schedule Consultations	5
<b>3.0</b>		<b>Stakeholder Engagement</b>	<b>8</b>
Appendix 1		List of consultation bodies	9
Appendix 2		List of public inspection locations	25
Appendix 3		Summary of responses	26

## **1.0 Introduction**

### **1.1 Purpose of this statement**

1.1.1 This statement sets out the community engagement and consultation undertaken to date for the Community Infrastructure Levies being delivered by Daventry District Council, Northampton Borough Council and South Northamptonshire District Council.

1.1.2 For six weeks during June and August 2014 the West Northamptonshire Joint Planning Unit managed a consultation on the Draft Charging Schedules on behalf of the Partner Councils that have the powers to charge a community infrastructure levy.

### **1.2 Background**

1.2.1 In order for a Community Infrastructure Levy (CIL) to be adopted, it is required by the CIL Regulations 2010 (as amended) that the Partner Councils that propose to charge CIL hold a minimum of two rounds of public consultation. The first round of consultation to be held is concerned with the Preliminary Draft Charging Schedule 'PDCS' and the second with the Draft Charging Schedule 'DCS'. The Councils also decided to hold stakeholder engagement sessions in order to gauge the opinions of developers, the local community and other organisations with an interest in development in the West Northamptonshire area.

1.2.2 Regulations 15 and 16 of the CIL Regulations specify the consultation bodies that the Councils must consult for the PDCS and DCS. The Councils have consulted beyond the statutory minimum requirement in order to ensure that a wide range of consultation bodies were given the opportunity to make representations. These consultation bodies include parish councils, community groups and organisations, representatives from the affordable housing sector, local businesses and the development sector that operates locally.

1.2.3 The charging Partner Councils are also required to publish a Statement of Community Involvement (SCI), the primary purpose of which is to clarify the breadth of consultation that will take place with respect to the preparation of the planning framework that will guide development in the area.

1.2.4 As the adoption of a CIL is embedded within planning legislation, regulations and guidance and its purpose is to support the funding of infrastructure associated with the planned growth set out within the adopted West Northamptonshire Joint Core Strategy. It is appropriate to align public consultation relating to CIL with adopted SCIs. As such the SCIs of the Partner Councils, along with statutory consultation requirements of Regulations 15 and 16 of the CIL Regulations, helped form the basis for determining who has been consulted on CIL and how CIL will be implemented in West Northamptonshire.

### **1.3 The West Northamptonshire Joint Core Strategy**

1.3.1 West Northamptonshire is the area covered by Daventry District, Northampton Borough and South Northamptonshire Councils. It includes the towns of Northampton, Daventry, Towcester and Brackley and all the villages and rural areas within the three Councils' administrative areas.

1.3.2 The Joint Core Strategy has been prepared by the West Northamptonshire Joint Planning Unit on behalf of the three Councils of Daventry District, Northampton Borough and South Northamptonshire working together with Northamptonshire County Council.

1.3.3 The West Northamptonshire Joint Core Strategy (adoption expected December 2014) provides a planning framework for the West Northamptonshire area up to 2029. It sets out the long term vision and objectives for the whole of the area and includes strategic policies for steering and shaping development. It identifies locations for strategic new housing and employment and details the infrastructure (such as transport improvements, schools, open space and community facilities) required to support this development. It also defines where development will be limited.

1.3.4 The Localism Act 2011 and the Town and Country Planning (Local Planning) (England) Regulations 2012 introduced a range of changes to the planning system, and the Joint Core Strategy is now a Part 1 Local Plan alongside a range of Part 2 Local Plans covering different locations or topics that will contribute to guiding development and use of land in West Northamptonshire for the Plan period up to 2029. Together the Part 1 and Part 2 Local Plans will comprise the Development Plan for each West Northamptonshire Partner Council.

1.3.5 The CILs will collect charges from development to facilitate the delivery of necessary supporting infrastructure across West Northamptonshire.

Combined with other sources of finance, such as s106 agreements and Government capital investment programmes, the CILs will contribute towards infrastructure required as a result of the growth outlined within the Development Plan.

## **2.0 Consultations**

### **2.1 The Preliminary Draft Charging Schedule Consultations**

2.1.1 The purpose of the Preliminary Draft Charging Schedule (PDCS) consultations was to allow local communities, developers and businesses to make representations on the initial proposed CIL charging schedules for each of the charging Partner Councils. The Joint Planning Unit managed the consultations on behalf of the three Councils.

### **2.2 The Consultation Process**

2.2.1 The consultation period for the PDCSs was held between Thursday 14 March and Monday 29 April 2013. The consultation for each PDCS was held in parallel and the process was identical for each.

2.2.2 A Statement of Consultation was produced relating to this consultation and this was made available alongside the second consultation period relating to the Draft Charging Schedules. It is available via the website at the following location:

[http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN\\_CIL\\_DCSs\\_Consultation/consultationHome](http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN_CIL_DCSs_Consultation/consultationHome)

### **2.3 The Draft Charging Schedule Consultations**

2.3.1 The purpose of the Draft Charging Schedule (DCS) consultations was to allow local communities, developers and businesses to make representations on the proposed charging schedules for each of the charging Partner Councils. This consultation document provided feedback on the PDCS consultation and took into consideration the changes to legislation in the intervening period. The Joint Planning Unit managed the consultations on behalf of the three Councils.

### **2.4 The Consultation Process**

2.4.1 The consultation period for the DCSs was held between Thursday 26 June and Thursday 07 August 2014. The consultation for each DCS was held in parallel and the process was identical for each.

2.4.2 The methods of consultation that were used are detailed below:

i. Letter and email notification;

Notification by either letter or email was sent to the following:

- The statutory consultation bodies as specified in Regulation 16 of the CIL Regulations;
- The consultation bodies specified in each charging Partner Council's SCI; and
- All those other companies, organisations and individuals in the development sector that the charging Partner Councils considered may have an interest in CIL.

Every organisation and individual notified about the DCS consultation over and above the statutory consultees received that notification by either standard letter or email. In total the Joint Planning Unit contacted 1625 consultees. Appendix 1 lists each consultee.

ii. Advertisement on the West Northamptonshire Joint Planning Unit Website;

The consultation was made available online and the consultation featured on the front page of the website for the duration of the consultation period.

2.4.3 The DCS and relevant evidence was made available for public inspection at the following locations:

i. The Partner Councils' principal offices

A paper copy of the DCS and relevant evidence was made available at the following locations:

- Daventry District Council One Stop Shop, Lodge Road, Daventry, NN11 4FP
- Northampton Borough Council One Stop Shop, The Guildhall, St Giles Square, Northampton, NN1 1DE
- South Northamptonshire Council Reception, Springfields, Towcester, Northamptonshire, NN12 6AE.

ii. The offices of Northamptonshire County Council.

iii. The West Northamptonshire Joint Planning Unit Website

An electronic copy of the DCS and relevant evidence is available on the West Northamptonshire Joint Planning Unit website by visiting [http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN\\_CIL\\_DCSs\\_Consultation/consultationHome](http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN_CIL_DCSs_Consultation/consultationHome)

iv. Local libraries

Paper copies of the DCS and relevant evidence were deposited for public inspection on request at 21 council libraries across the West Northamptonshire partnership area (including mobile libraries) together with a further 15 council libraries in the areas of adjoining Councils to West Northamptonshire (See Appendix 2 for a full list).

2.4.4 In order to assist respondents in the consideration of the consultation, a questionnaire was produced which posed 6 questions. These are discussed further in the following section.

## 2.5 Results of the Draft Charging Schedule Consultations

2.5.1 The Joint Planning Unit received 56 responses to the DCS consultations that included representations made by statutory agencies, developers, Parish Councils, local residents, infrastructure and utilities companies, public service providers and environmental groups.

2.5.2 Those consulted were able to submit their comments electronically or in writing by letter or questionnaire. We received 27 emails, 25 online responses and 4 paper responses. Some of the key issues arising from the consultation are summarised in the tables below.

<b>Question 1</b>
Do you have any comments relating to the CIL Draft Charging Schedule(s)?
<p>Summary of responses:</p> <ul style="list-style-type: none"> <li>• Residential rural rates are too high – developer interests.</li> <li>• Residential rural rates are supported or are too low – Parish Councils.</li> <li>• SUEs should be £0m<sup>2</sup> – developer interests.</li> <li>• Discretionary relief should be provided.</li> <li>• It would be more cost effective to have a joint CIL.</li> <li>• A joint CIL would be essential in determining a fair allocation of CIL monies.</li> <li>• Should extend remit to encompass benefits of wind and solar farm applications.</li> <li>• Support for £0m<sup>2</sup> on 'all other uses'.</li> <li>• Student accommodation should be zero rated.</li> <li>• Development related to agricultural and rural diversification should be zero rated.</li> <li>• Levy is disproportionately weighted against rural developments.</li> <li>• Rural rates will lead to increased unaffordability.</li> <li>• Support for nil contribution for employment uses.</li> <li>• A buffer on the rates does not appear to have been applied.</li> <li>• There is no evidence that the Councils are striking the 'appropriate balance'.</li> <li>• CIL should only be applied to sites too small for a s106 agreement.</li> <li>• SNC should not adopt a CIL as the s106 process works.</li> <li>• CIL should be applied to all use classes.</li> </ul>

**Question 2**

Do you have any comments relating to the draft Regulation 123 List(s)?

Summary of responses:

- Any changes to R123 Lists before the Examination in Public should be consulted upon.
- Public art and fire services should not be on the DDC R123 List.
- The DDC R123 List is too broad.
- R123 Lists focus too heavily on urban areas.
- Primary education should not be on the R123 Lists (NBC and SNC).
- Secondary education should be caveated to exclude specific on site provision (DDC).
- The way in which education is phrased is 'double dipping/counting'.
- Support inclusion of NGMS and North West Bypass Phase 2.
- Alternative projects have been recommended for inclusion on the R123 Lists:
  - Improvements to A5 at Potterspurty;
  - Improvements to A422 at Brackley;
  - Parking issues in rural areas;
  - Flood risk/prevention projects; and
  - Sustainable energy projects.
- Strategic infrastructure should be provided by Government.
- Recommend conformity of all three R123 Lists.

**Question 3**

Do you have any comments relating to the draft Instalment Policy?

Summary of responses:

- Alternative policies recommended – developer interests.
- Policy should be tested against viability of sites.
- One Parish Council considers that an Instalment policy is sensible but another considers that it should not be allowed.

**Question 4**

Do you have any comments relating to the CIL Economic Viability Updated Report 2014?

Summary of responses:

- Copies of the appraisal summaries are required to fully comment.
- Appraisals over estimate development density and therefore viability.
- Following assumptions are considered too low: base land value; BCIS build costs; external works assumption; marketing fees; s106; professional fees for SUEs; and development contingency.
- Ground rent should be removed.
- A number of respondents (developer interests) have provided detailed evidence on viability.

**Question 5**

Do you have any comments on the approach to infrastructure funding through CIL?

Summary of responses:

- Welcome inclusion of Open Space and Green Infrastructure through CIL.
- Flood and water management should be funded by CIL.
- Councils should consider using CIL for rail station improvements.



- Evidence to support infrastructure approach is out of date.

**Question 6**

Do you have any other comments?

Summary of responses:

- Progression of CIL is premature as Joint Core Strategy is not adopted.
- Lack of information provided to Parish Councils.
- Monitoring should be standardised and co-ordinated.
- CIL relief is supported by developer interests.
- CIL relief is not supported by Parish Councils.
- No evidence presented on s106 approach post submission.
- A review of CIL in 2016 should be committed to by the Councils.
- Parish element / neighbourhood portion should be higher.
- Clarity sought on how parishes wishes are acted upon for parish element.
- Further clarity on the geographical area of the charging zones is required.
- Governance arrangements need to be clarified.

2.5.3 The responses to the DCS consultations have been published on the West Northamptonshire Joint Planning Unit website. An overview of the responses, which includes a précis of the representations, is available at Appendix 3. The full version of each response is available via the website at:

[http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN\\_CIL\\_DCSs\\_Consultation/listresponses](http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN_CIL_DCSs_Consultation/listresponses)

2.5.4 The table in Appendix 3 also summarises the response of the Partner Councils and the consultants supporting the CIL preparation process in the West Northamptonshire area, GVA.

### **3.0 Stakeholder Engagement**

- 3.1 Prior to embarking upon the preparation of the Preliminary Draft Charging Schedules, the Councils invited representatives of the development sector to CIL Workshops run by GVA, the consultants employed by the Councils to produce the viability assessment to inform the Partner Councils' approach to rate setting.
- 3.2 The first event took place on Friday 27 July 2012. The event was targeted at agents, landowners and developers who would be able to provide constructive feedback into the CIL viability assessments being undertaken by GVA on behalf of the Partner Councils. An invitation was sent to 131 representatives of the development sector representing house builders, surveyors, planning consultants, promoters of commercial premises, land agents and the affordable housing sector. The event was attended by 23 stakeholders.
- 3.3 The workshop was underpinned by a presentation by officers of the Joint Planning Unit and GVA that set the scene to CIL and the approach of GVA to setting assumptions to be used to determine viability of different types of development across West Northamptonshire. There was discussion on the types of development that it might be appropriate to test, the place of affordable housing and the relationship with the future of s106 planning obligations.
- 3.4 GVA offered any person attending the opportunity to make direct contact by telephone or email to discuss any matter that may arise subsequent to the event.
- 3.5 The second event took place on Friday 11 January 2013. An invitation was sent to 177 stakeholders. This event was organised to present the viability conclusions and provide an opportunity for further comment prior to the finalisation of the viability report. The event was attended by 16 stakeholders.
- 3.6 The partner Councils also held an Infrastructure Delivery Workshop on 8 May 2014 to discuss infrastructure delivery, the prioritisation of projects and alternative funding mechanisms. In total 194 stakeholders were invited and 28 people attended.

## Appendix 1 – List of consultation bodies

Abbey Ross
A Bell & Co Ltd
Abbey Developments Ltd
Abbeyfield Housing
Abington Community Centre
Abington Consulting Engineers Ltd
Abington Park Conservation Society
Abthorpe Parish Council
AC Adam Development Ltd
Accent Nene
Adderbury Parish Council
Adolescent Services
Adstone Parish Meeting
Advance Housing Association
African Caribbean Elders Society
Age Concern
Albion Land Ltd
Alderton Parish Meeting
Alderwood Living and Learning with Autism
Allen, BH
Althorp Estate
Althorp Parish Meeting
Alyn Nicholls & Associates
Ancer Spa (Midlands) Ltd
Anchor Housing Association
Ancient Monuments Society
Ancient Tree Forum
Andrew Granger & Co
Andrew Martin Associates
Anglian Water
Anjumane Ghulamene Hazrat Abbas a.s.
Anthony Ricketts Partnership
APC
Aracon UK
Aragon
Armitage Homes Ltd
Arnold Thompson
Arriva MK
Arthingworth Parish Council
Arts Council England, East Midlands

Ashby Capital
Ashby St Ledgers Conservation Group
Ashby St Ledgers Farms LTD
Ashby St Ledgers Parish Meeting
Ashfield Land (Birmingham) Ltd
Ashfield Land Limited
Ashfield Land, Arm Farm, Blisworth
Ashton Parish Council
Aston-le-Walls Parish Council
Atkins (Property Service, NCC)
Aviva Investors Ltd
Avon Cosmetics Ltd
Aylesbury Vale District Council
Aynho Parish Council
Badby Parish Council
Bahai Faith
Banbury Lane Residents Association
Banbury Library
Banbury Town Council
Banner Homes (Midlands) Ltd
Barby & Onley Parish Council
Barclays Bank PLC
Barrack Road CAAC
Barratt Developments
Barratt Developments/Kier Ventures Limited
Barratt Homes
Barratt PLC
Barratt Strategic
Barris Liptrott
Barry Howard Homes Ltd
Barton Willmore LLP
Barwood Land
Barwood Land and Estates Ltd
Bayly and Co
Beachampton Parish Council
Beacon Housing Association
Bed & Herts LMC
Bedfordshire CCG
Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust

Bellinge & District Residents Association
Bellinge Community House
Bellway Homes
Bellway Homes Northern Home Counties
Ben Coleman Associates
Berkeley Strategic
Bernard & Mary Sunley Ltd
Berry Morris
Berrys
Biddlesden Parish Meeting
Bidwells
Billing Parish Council
BioPower Ltd
Black & Veatch Ltd
Blackthorn & Goldings Residents Association
Blackthorn Community Centre
Blackthorn Good Neighbours & Children's Centre
Blackthorn Residents Association
Blakesley Parish Council
Bletsoe & Son
Blisworth Heritage Society
Blisworth Parish Council
Bloor Homes
Blue Boar Group Holdings
Boddington Parish Council
Bodicote Parish Council
Boothville Community Centre
Boothville Residents Association
Boots the Chemists Ltd
Borough Council of Wellingborough
Boughton Parish Council
Boughton Primary School
Bourton Parish Council
Bovis Homes Ltd
Boyer Planning
BPA Ltd
BPHA
Brackley Fox Lane Gospel Hall & Wantage Gospel Hall Trust
Brackley Fox Lane Trust
Brackley Means Business
Brackley Residents Association

Brackley Town Council
Brackley Vision
Bradden Parish Meeting
Brafield on the Green Parish Council
Brafield on the Green Parish Council & Brafield on the Green Action Group
Brafield Stadium- Brafield Motorsports
Branston & Company
Braunston Parish Council
Braybrooke Parish Council
BRE
Brian Barber Associates
Briar Hill 2 Residents Association
Briar Hill Community Centre
Briffa Phillips
Bringtons and Nobottle Parish Council
British Airways Pension Trustees
British Geological Survey
British Horse Society
British Telecom
British Toilet Association
British Trust of Conservation Volunteers
British Wind Energy Association
Briton Properties Ltd
Brixworth Library
Brixworth Parish Council
Brockhall Parish Meeting
Brockwatch
Bromford Housing Group
Bromford Living
Brookside Residents Council
Broughton Parish Council
Brown and Co
Brown Co
Buchanan Consulting Engineers (Capital Symonds)
Buckingham and River Ouzel Internal Drainage Board
Buckingham Canal Society
Buckingham Library
Buckinghamshire County Council
Budworth Hardcastle
Bugbrooke Parish Council

Burbage Realty
Burcote Developments Ltd
Burnett Planning and Development
Butler Sherborn
Byfield Parish Council
C Walton Ltd
CABE, Design Council
Cable & Wireless UK
CALA (Campaign against Lorry Abuse)
Calverton Parish Council
Calvoyden Property Ltd
Camargue Consultants
Camp Hill Residents Association
Campaign to Protect Rural England (CPRE)
Campion School
CAMRA
CAN
Canal & River Trust
Cannons Group Limited
Cannons Health and Fitness Ltd
Canons Ashby Parish Meeting
Capita Lovejoy
Carlsberg Tetley
Caroline Chisholm School
Carter Jonas
Castle Ashby Parish Council
Castle Residents Association
Castle St James Residents Association
Castletorpe Parish Council
Catesby Parish Meeting
Catesby Property Group
Catthorpe Parish
CB Richard Ellis Ltd
Celeford Essex Associates
Celsius Consulting
CEMEX
Cerda Planning
CGMS
Chacombe Parish Council
Chadwick McRae Chartered Surveyors
Charles F Jones
Charwelton Parish Meeting

Chell Instruments Ltd
Chemical Business Association
Chenderit School
Cherwell District Council
Chesterton Plc
Chetwood Associates
Chipping Warden and Edgcote Parish Council
Chown Commercial Limited
Chris Thomas Ltd
Christ Church Oxford
Christian Aid (Charity)
Christina Cherry
Church of England
Church with Chapel Brampton Parish Council
Churches Conservation Trust
Churches Together in Daventry
Churches Together in Northamptonshire and Peterborough
Circle Anglia
Citizen's Advice Bureau
Civil Aviation Authority
CJC Development Co Ltd
CLA East
Clay Coton Parish Meeting
Claydon with Clattercote Parish Council
Clayson Country Homes
Cleford Essex
Clifton Upon Dunsmore Parish Council
Clipston Parish Council
Clubs for Young People
Cluttons
Cogenhoe and Whiston Parish Council
Cognita Schools
Cold Ashby Parish Council
Cold Higham Parish Council
Colliers CRE
Colliers International
Collingtree CAAC
Collingtree Parish Council
Collingtree Park Residents Association
Colwyn Road Residents Association
Commission for Rural Communities
Community & Residents Association of

Southfields
Community Access and Language Service
Community Landscape Archaeology Survey Project
Community Safety team, Northamptonshire Police
Community Windpower Ltd
Concept Town Planning Ltd
Connells Land and Planning
Connexions
Conservation Officer Group & Partners
Cook, RJ
Corby Borough Council
Corby CCG
Corus Property Department
Cosgrove Parish Council
Costco Wholesale UK Ltd.
Cottesbrooke Parish Meeting
Cottisford Parish Meeting
Council for British Archaeology
Country Landowners Association East
Country Properties
Countryside Properties (Special Projects) Ltd
County Travellers Unit
Courteenhall Parish Meeting
CPRE Northamptonshire
Cransley Parish Council
Creaton Parish Council
Crest Homes
Crest Nicholson
Crest Strategic Projects Ltd
Crick Parish Council
Crime Prevention Design Advisor
Crossroad Care
Croudace Strategic Ltd
Croughton Parish Council
Culworth Parish Council
Cushman & Wakefield
Cushman and Wakefield Healey and Baker
Cyclists Touring Club
D M Wood Will Trust
Dalton Warner Davis
Dandara Holdings

Danetree Consortium Landowners
Danetree Marches Ltd/Danetree Ltd (UKSL Group) & Danetree Landowners
Darwin Developments
Daventry and District Housing
Daventry Area Community Transport
Daventry Business Breakfast Club
Daventry Constituency
Daventry District Council
Daventry District Local Strategic Partnership
Daventry Fire Service
Daventry Police
Daventry Tertiary College
Daventry Town Council
Daventry Villages Together
Daventry Volunteer Centre
David Lock Associates
David Williams IFA
David Wilson Homes
Davidsons Development
Day Lewis Planning
DB Schenker Railway Ltd
Dbi Consulting
De Pol Associates
Deafconnect - Connecting Deaf People
Deanshanger Parish Council
Deanshanger Village Heritage Society
Deddington Parish Council
Deenside Ltd
Defence Estate Operations North
Defence Infrastructure Organisation
Deloitte - DR Planning & Development
Deloitte Llp
Delta Planning
Dennis Faulkner & Alsop
Denton Parish Council
Department for Business, Innovation and Skills
Department for Constitutional Affairs
Department for Culture, Media and Sport
Department for Environment, Food and Rural Affairs
Department for Transport

Department of Energy and Climate Change
Derbyshire Gypsy Liaison Group
Derwent Living
Development Land & Planning
DIAL
Diamond Estates
Dignity Funerals Ltd
Disabled People's Alliance
District Development Consultancy
District Liaison Office, Daventry and South Northants
DLA Piper UK LLP
DLP Planning Ltd
Dodford Parish Meeting
Dostiyo - Asian Women and Girls Organisation
Double H Residents Association
Douglas Redlands
Doyle, P
DPDS Consulting Group
Drake Commercial
DRH Architectural Design
Drivers Jonas
Drivers Jonas Deloitte
DTZ
DTZ Pieda Consulting
Dunchurch Community Library
Dunchurch Parish Council
Duston Action Group
Duston Community Centre
Duston Dental Practice
Duston Library
Duston Local History Society
Duston Parish Council
E M W Picton Howell Llp
Earls Barton Library
Earls Barton Parish Council
East & North Herts CCG
East Farndon Parish Council
East Haddon Parish Council
East Midlands Ambulance Service
East Midlands Conservatives
East Midlands Councils

East Midlands Electricity
East Midlands Housing Association
East Northamptonshire Council
Eastfield Residents Association
Easton Maudit
Easton Neston Parish Meeting
Easynet Group
Easynet Ltd/Sky Network Services
EC Harris
Ecton Parish Council
Ekins Allotment Association
Elkington Parish Meeting
English as 2nd Language Group
English Churches Housing Group
English Heritage
English Historic Towns Forum
Entec UK Ltd
Enterprise Solutions
Environment Agency
Equality and Human Rights Commission
Equibrand
European Parliament for the East Midlands
Evenley Parish Council
Everdon Parish Council
EWS Ltd (D B Schenker UK Ltd)
Executors of Freda Balding and Mr England
Eydon Parish Council
Fable Gospel Hall Trust
Far Cotton Library
Far Cotton Residents Association
Farming & Wildlife Advisory Group
Farthinghoe Parish Council
Farthingstone Parish Council
Fawsley Parish Meeting
Fernie Fields Scout & Community Centre
First Bus - Northampton
First Church of Scientists
First City
first4blinds
FirstPlan Ltd
Fisher German
Flore Parish Council

FOBA (Friends of Boughton Area)
For the Society of Merchant Venturers (Land to the southwest of Brixworth)
Forestry Commission
FPD Savills
Framptons Planning
Francis Jackson Homes
Frazer Kirkcaldy
Freeman Leisure
Freeth Cartwright LLP
Freight Transport Association
Friars and Delapre Residents Association
Friars Residents Association
Friends of Abington Library
Friends of Alderton Monuments
Friends of Bradlaugh Fields
Friends of Dallington Park
Friends of Delapre Abbey
Friends of Eastfield Park
Friends of the Earth
Friends, Families & Travellers Land Reform Project
Frontier Estates
Fusion Online Ltd
G A Soame & Associates
G L Hearn Planning
G R Kenning
Gallagher Estates
Garbe (Northampton) Limited
Garbe Real Estate Ltd.
Gardner & Associates
Gayton Parish Council
Gazeley Ltd
General Motors
Geoff Amos Coaches
George Wimpey South Midlands Ltd
George Wimpey UK Ltd
George Wimpey West Midlands Ltd
Gerald Eve
Gharana House
Gibbins, J
GL Hearn Ltd
Gladman Developments

Godfrey Payton
Goldfinch
Gotch, Saunders and Surridge
Govia (London Midland)
GP Planning Ltd
Grafton Regis Parish Meeting
Grand Union Housing Group
Grandfield Partnership
Grange Park Parish Council
Great Houghton Action Group
Great Houghton Parish Council
Great Oxendon Parish Council
Greater Northampton Deanery, Diocese of Peterborough
Greatworth Parish Council
Green Park Residents Association
Greenpeace (Northampton)
Greens Norton Parish Council
Gregory Gray Associates
Grendon Parish Council
Group Holdings Ltd
Group Impact
Growing Together Neighbourhood Forum
GSS Architects
Guilsborough Parish Council
Guinness Midsummer
Guinness South
GVA Grimley
GWJ Plant Hire Contractors
h2o Creative Communications Ltd
Hackleton Parish Council
Hackleton Parish Council
Hackleton, Horton, Piddington and Preston Deanery Parish Council
Hadland Chartered Surveyors
Hallam Land Management
Hallam, M
Hampton Brook
Hampton Brook Estates Ltd
Hannington Parish Council
Hannington Properties
Hanover Housing
Hanslope Parish Council



Harborough District Council
Hardingstone Parish Council
Hardwick Parish Council
Hardwick with Tusmore Parish Meeting
Harlestone Parish Council
Harpole Action Team
Harpole Charity Trustees - Harpole Heritage Group
Harpole Parish Council
Harrington Parish Council
Harris Lamb Planning Consultancy
Hartwell Bond
Hartwell Parish Council
Harwoods
Haselbech Parish Meeting
Hawkmoor Property Services
Head Mann Associates Ltd
Healey & Baker
Heaton Planning Ltd
Hellidon Parish Meeting
Helmdon Parish Council
Henry H Bletsoe & Son
Heritage Property Projects Ltd
Herts Valleys CCG
Hewitsons
Heyford Homes Ltd
Heygate and Son
High Speed Two (HS2) Ltd
Highgrade Motors
Highways Agency
Highways and Transport service
Hinton In The Hedges Airfield
Hinton-in-the-Hedges Parish Meeting
Historic Houses Association
Hobden Associates
Hobden Partnership
Hodgson, T
Hogg, Messrs
Holcot Parish Council
Holdenby Parish Meeting
Hollowell & Teeton Parish Council
Holmes Antill
Home Builders Federation

Home Builders Federation Ltd
Home Housing
Home Housing Association
Homes and Communities Agency (HCA)
Hood Street Residents Association
Hopping Hill Residents Association
Howard Sharp and Partners LLP
Howkins and Harrison
Hunsbury & Collingtree Residents Alliance
Hunsbury Library
Hunsbury Meadows Parish Council
Hunsbury Residents Association
Husbands Bosworth
IG Land and Planning
Inclusion & Pupil Support
Indian Hindu Welfare Organisation (IHWO)
Indigo Planning Ltd
Inland Waterways Association
Innes England
Institute of Directors (London)
Investin plc
Isis Builders
J & J Design
J G Walter LLP
J S Bloor Services
Jabulani
Jack Barker Golf Ltd
James Martin and Co.
Januarys
Januarys Consultant Surveyors
JB Planning Associates
Jehovah's Witnesses
Jennifer Lampert Associates Ltd
Jephson Housing Association
Jesus Army
JMPR
John & Wendy Salisbury
John Drake & Co
John Martin & Associates
John Phillips Planning
Joint Council for the Welfare of Immigrants
Jones Day

K B Benfield Group Holdings Ltd
Kelmarsh Parish Meeting
Kember Loudon Williams Ltd
Kemp & Kemp
Kettering Borough Council
Kettering Community Architects
Kettering Constituency
Kettering Road East Park Parade Residents & Community Association
Kier Property
Kilmartin London Ltd.
Kilsby Parish Council
Kimbell Trust
King Sturge Llp
King West
King West Blacklee Smith
Kings Heath Community Centre
Kings Heath Residents Association
King's Sutton Parish Council
Kingsbrook School
Kingsley Park Methodist Church
Kingsley Residents Association
Kingsthorpe CAAC
Kingsthorpe Conservation Committee
Kingsthorpe Grove Allotments Association
Kingsthorpe Team Ministry, St. Mark (CofE)
Kirkby and Diamond
Kirkwells Town Planning Consultants
Kislingbury Parish Council
Kleinwort Benson
Knight Frank
Lafarge Aggregates
Lakeview Residents Association
Lambert Smith Hampton
Lamport and Hanging Houghton Parish Council
Land Securities Properties Ltd
Landform Estates Ltd
Landmark Information Group
Landmark Planning Ltd
Landowner: Bridge Spinney
Landowner: Green Norton
Landowner: Kilsby 2, Rugby

Landowner: London Road, Daventry
Landowner: Long Bucky, East Haddon
Landowner: New Street, Weedon Bec
Landowner: Watford Road Crick
Landscape
Lane Fox Residential Ltd
Lawrence & Deal Court, Deal, Leicester & Duke Street Residents Association
LDA Design
Leadsom, Andrea MP
Leckhampstead Parish Council
Legal & General
Leicester Housing Association
Leicestershire County Council
Leith Planning
LEVVEL Consulting Ltd
Leybourne Homes Ltd
LHA - ASRA
LHA Housing Association
Lidl UK
Lilbourne Parish Council
Lillingstone Dayrell with Luffield Abbey Parish Council
Lillingstone Lovell Parish Council
Linden Homes
Linden Homes North
Litchborough Parish Council
Little Houghton Parish Council
Little Houghton Parish Council & Little Houghton Action Group
Livability
Local Dialogue LLP
Lockhart Garratt
Loddington Parish Council
London Midland
Long Buckby Parish Council
Long Buckby Rail Users' Group
Loveday & Davis
Lovejoy Partnership
Lubenham
Lucas Land and Planning Consultants Ltd
Luton CCG
M & D Herbert (landowner)

Magdalen School
Maidford Parish Council
Maidwell & Draughton Parish Council
Malcolm Scott Consultants Ltd
Manager Metropolitan Housing Partnership
Mansford Holdings Plc
Marchfield Developments
Marcus Bates Ltd
Market Harborough Library
Maroon Planning Ltd
Marriott Hardcastle
Marrons
Marston St Lawrence Estate
Marston St Lawrence Parish Council
Marston Trussell Parish Meeting
Martin Grant Homes (UK) Ltd
Martin Grant Homes Ltd and Harcourt Developments
Martin Pendered & Co
Martin Robeson
Marwalk
Mawsley Parish Council
McCann Homes
McCarthy and Stone
McGowan Investments
McManus Pub Company Ltd
Meguiar's UK Ltd
Mercantile Land
Mereway Ambulance Station
Merrys
Messrs Martineau Solicitors
Metropolitan Housing Partnership
MF Freeman Ltd
MGWSP
Michael and Phillip Wilkinson Architects
Michael Hardiman & Associates LLP
Mickle Well Park Landowners
Mid Northants Parishes
Middleton Cheney Parish Council
Midland Heart
Midlands Rural Housing
Midsummer Housing Association
Mike Hardy Planning Consultant

Miller Homes
Milton Keynes CCG
Milton Keynes Council
Milton Keynes Primary Care Trust (PCT)
Milton Malsor Action Group
Milton Malsor Historical Society
Milton Malsor Parish Council
MIND
Minster General Housing Association
Mintondale Developments Ltd
Mixbury Parish Meeting
MJH
MKSM Cultural Co-ordinator
Mobile Operators Association
Molyneux Planning
Mono Consultants Ltd
Montagu Evans LLP
Montague Jeffrey Menswear
Morandi Coffee House
Moreton Pinkney Parish Council
Morgan, DN
Morton Wykes Kramer LLP
Mott McDonald
Moulton College
Moulton College and University of Northampton
Moulton Environment Group
Moulton Parish Council
Moulton Surgery
MPAC
Muir Group
Nagarjuna Buddhist Centre
Naseby Battlefield Project
Naseby Parish Council
Nathaniel Lichfield and Partners
National Association of Allotments & Leisure Gardeners Ltd
National Council of Women
National Farmers Union
National Federation of Bus Users
National Federation of Gypsy Liaison Groups
National Federation of Young Farmers Clubs
National Grid

National Market Traders Federation
National Probation Service
National Trust
Nationwide Building Society
Natural England
Natural Resources LTD
Nene Commissioning
Nene Flood Prevention Alliance
Nene Housing Society
Nene Valley Nature Improvement Area
Nether Heyford Parish Council
Network Rail Town Planning Team LNW
New Testament Church of God
Newbeat Enterprises Ltd
Newbottle & Charlton Parish Council
Newnham Parish Council
Newton and Biggin Parish Council
NFU East Midlands Region
NHS Confederation
NHS Executive
NHS Milton Keynes & Northamptonshire
NHS Nene Clinical Commissioning Group
NHS Property Services
Nicholas Tye
NJL Consulting
North Kilworth
North Northampton Landowners
North Northamptonshire Joint Planning Unit
Northampton & Lamport Railway
Northampton Abington Community Association
Northampton Afro Caribbean Organisation
Northampton Bangladeshi Association
Northampton Borough Council
Northampton Chamber of Trade
Northampton College
Northampton Communications Ltd
Northampton Connolly Association
Northampton Door to Door Service (NDDS)
Northampton Federation of Residents' Associations
Northampton Federation of Townswomens Guilds

Northampton Friends of the Earth
Northampton Garden Centre
Northampton General Hospital NHS Trust
Northampton Gujarati Hindu Community
Northampton House Residents Association
Northampton Inspection and Advisory Service
Northampton Inter Faith Forum
Northampton Landlords' Association
Northampton North Constituency
Northampton Police
Northampton Rail Users Group
Northampton Roundhill and UK Strategic Land
Northampton School for Girls
Northampton South Constituency
Northampton Taxi Cab Association
Northampton Town Centre Conservation Areas Advisory Committee
Northampton Town Football Club
Northampton Town Football Club Supporters Limited
Northampton Volunteering Centre
Northampton Women's Aid
Northampton Youth Ministry Office
Northamptonshire LMC
Northamptonshire ACRE
Northamptonshire Adult Learning Service
Northamptonshire Archaeological Society
Northamptonshire Association of Local Councils
Northamptonshire Association of Youth Clubs
Northamptonshire Bat Group
Northamptonshire Central Library
Northamptonshire Chamber
Northamptonshire Community Foundation
Northamptonshire Co-operative Development Agency
Northamptonshire County Council
Northamptonshire County Federation of Womens Institutes
Northamptonshire Enterprise Partnership
Northamptonshire Environmental Forum
Northamptonshire Fire & Rescue Service

Northamptonshire Gardens Trust
Northamptonshire Local Access Forum
Northamptonshire Local Medical Committee
Northamptonshire Local Nature Partnership
Northamptonshire Police
Northamptonshire Probation Area
Northamptonshire Racial Equality Council
Northamptonshire Residents Alliance
Northamptonshire Rural Housing Association
Northamptonshire Sport
Northamptonshire Voluntary Youth Action
Northants Green Party
Northants Shared Ownership Housing
Northants Young Farmers
Nortoft Partnerships Ltd
Norton Parish Council
Nottingham Community Housing Association
NRA
NTACT
NYK Logistics (UK) Ltd
O2 (UK) Limited
Octagon Residents Association
Office of Government Commerce
Office of Rail Regulation
Old Parish Council
Old Road Securities Plc
Old Stratford Parish Council
Oliver Adams Limited
Olney Library
Olney Town Council
Orbit Heart of England
O'Riordan Bond
Orlingbury Parish Council
Orton Parish Council
Osborne & Shellard
Overstone Lodge & Goldings Residents Association
Overstone Parish Council
Overthorpe Parish Council
Oxfordshire Archaeological Unit
Oxfordshire County Council
Oxfordshire LMCs
Oxfordshire Primary Care Trust

Parklands Allotments Association
Parklands Community Association
Parklands Community Centre
Pastures Community Centre
Pattishall Parish Council
Paulerspury Parish Council
Peacock and Smith (Morrisons Supermarkets)
Pegasus
PEMBA Residents Association
Pensioners Voice
Persimmon Homes (Midlands) Ltd
Persimmon Homes / Bloor Homes
Persimmon Homes and Redrow Homes
Persimmon Homes/Barratt Homes
Persimmon Homes/Redrow Homes (Towcester South SUE)
Persimmon Special Projects
Peter Brett Associates
Peter Haddon Architects
Peterborough & Cambridgeshire CCG
Peterborough Diocesan Board of Finance
Phillips Planning Services Ltd
PHP Architects
Pitsford Parish Council
Plainwood Holdings
Planning Bureau Ltd
Planning Issues
Planning Perspectives
Planning Potential
Planning, Environment and Transport Strategy
Pleydell Gardens Residents Association
Pleydell Road Allotment Committee
Portchester Planning Consultancy
Portfutures and UKSL
Post Office Property Holdings
Potterspury Parish Council
Powergen
Preston Capes Parish Council
Priors Hardwick Parish Council
Priors Marston Parish Council
Prologis Developments Ltd

Prologis UK Limited
Prologis UK Ltd
Pye, JA
Pytchley Parish Council
q2 Architects
Queens Crescent Residents Association
Queens Park Residents Association
Quinton House School
Quinton Parish Council
Quod
R Stafford Charles & Son
Radstone Parish Meeting
Rail Freight Group
Railfuture
Ramblers' Association
Rapleys LLP
Ravensthorpe Parish Council
Ravenstone Parish Council
Rectory Farm Residents Association
Redline Town and Planning Development Consultants
Redrow Homes (Midlands) Ltd
Redrow Homes South Midlands
Reland (Weedon)
Religious Society of Friends
Renaissance Land
Renewable UK
Residents 4 Residents
RIBA East Midlands
Ridge
River Nene Regional Park
Riverside Housing Association
RMC Group Services Ltd
Road Haulage Association
Roade Library
Roade Parish Council
Roade School
Robco Reed Ltd
Robert Doughty Consultancy
Robert Harrison
Robert Hitchins Ltd
Robinson & Hall
Rockingham Forest Housing Association

Roger Coy
Roger Tym and Partners
Roman Catholic Diocese of Northampton
Ropemaker Properties Limited
Rotary
Rotary Club of the Nene Valley
Rothersthorpe Parish Council
Rothwell Library
Roxhill Developments Ltd
Roxhill Developments Ltd/Hampton Brook Developments Ltd
Royal and Derngate Theatres
Royal Mail
RPS Group
RPS Planning
RSPB
Rudding Estate Office
Rufford & Ralston PPC Ltd
Rugby Borough Council
Rugby Library and Information Centre
Rugby Radio Station Limited Partnership
S and S Construction Ltd
Sainsbury's Supermarkets Ltd
Saint James Residents Association
Samuel Rose Ltd
Sanctuary Housing
Savills
Savills (Commercial) Ltd
Savills (L&P) Ltd
Scaldwell Parish Council
Scouts Northamptonshire
Semilong Community Centre
Semilong Community Forum
SEMLEP
Servite Houses
Shacks Barn Farm Partnership
Sheinman Opticians
Shire Consulting
Shortland Horne
Shutlanger Parish Council
Sibbertoft Parish Council
Silverstone Estates Ltd
Silverstone Parish Council

Silverstone Pre-School Infants & Junior School
Siri Guru Singh Sabha
Skills Funding Agency
Slapton Parish Meeting
Slough Estates
Smiths Gore
Society for the Preservation of Ancient Buildings
Somali Community
SOS Campaign
Souldern Parish Council
South Kilworth Parish Council
South Midlands Barn Owl Group
South Midlands LIFT Company
South Northamptonshire Council
South Northamptonshire Labour Party
South Northamptonshire Volunteer Bureau
South Northamptonshire Youth Council
South Northants Homes
South Warwickshire Housing Association
Southbrook Junior School
Southfields Residents Association
Spawforths
SPCC Residents' Association
Spencer Dallington Community Centre
Spencer Dallington Residents Association
Sponne School
Sport England
Spratton Parish Council
Spring Boroughs Residents Association
Spring Boroughs Voice
St Andrews Healthcare
St Andrews Hospital
St Crispin and Berrywood Residents Association
St David's Residents Association
St Edmunds Residents Association
St James Community Centre
St James Library
St James Residents Associations
St. Giles Church
Stagecoach Bus (Midlands, Oxfordshire)

Stagecoach East
Stamford Homes Ltd
Stanford-on-Avon Parish Meeting
Stanifort Astill Ltd
Stansgate Planning
Star Planning & Development
Staverton Parish Council
Steer Ethelston
Steffan Jewellers
Stephen Ward Town Planning and Development Consultants Limited
Stepnell Estates Limited
Stewart Ross Associates
Stoke Bruerne Parish Council
Stoke Goldington Parish Council
Stoke Lyne Parish Council
Stoneton Parish Meeting
Stony Stratford Association
Stony Stratford Library
Stony Stratford Town Council
STOP Northants
Stowe-IX-Churches Parish Council
Strangford Property Consultancy Ltd
Strategic Land Partnerships
Stratford upon Avon District Council
Strutt & Parker
Stuart Michael Associates Ltd
Sulby Parish Meeting
Sulgrave Parish Council
Sustrans East Midlands
Swinford Parish Council
Sworders
Syresham Parish Council
Sywell Aerodrome
Sywell Parish Council
T H Land & Development Ltd
Tanfield Residents Association
Taylor Williams Properties
Taylor Wimpey
Taylor Wimpey and Barratt Strategic
TBS Jen Yin Temple
Tenscentral Ltd
Terence O'Rourke Ltd

Tesco Stores Limited
Tetlow King Planning
Tew and Smith
Thames Water Property
Thaw Residents Association
The Althorp Estate and J & E Rogers
The Baker Group
The Bell Cornwell Partnership
The Coal Authority
The Cross Settlement Trustees
The Crown Estate
The Department for Education
The Dioscesan Resource Centre
The Duncan Group
The Ensign Group
The Estate of Roger East
The Federation of Master Builders
The Folly Fellowship
The Garden History Society
The Georgian Group
The Grafton Hunt
The Gypsy Council
The Highways Agency
The Landowners: J & R Invernizzi, J & J Thomas
The Landowners: Russell/Wareing-Russell
The Landowners: Watt, Scott & Good
The Landscape Partnership
The Lawn Tennis Association
The Nene Flood Prevention Alliance
The Planning Bureau Limited
The Prince's Foundation
The Priory Inlands Residents Association
The Showmans Guild
The Stables
The Studio
The Sulgrave Manor Trust
The Theatres Trust
The Traveller Law Reform Project
The Twentieth Century Society
The Victorian Society
The Volunteer Centre Brackley
The Wantage Gospel Trust

The Woodland Trust
Theddingworth Parish Council
Thenford Parish Meeting
Thorburn Colquhoun
Thornby Parish Meeting
Thornton Parish Council
Thornton, D & M
Thorpe Mandeville Parish Council
Thorpeville Residents Association
Thorplands Residents Council
Thrift Streets & Vernon Terrace Residents' Association
Tiffield Parish Council
Time 2 Talk
T-Mobile (UK) Limited
TORCH Northamptonshire
Total Reclaims Demolition Ltd
Tove Benefice
Tove Valley Baptist Fellowship
Towcester & District Local History Society
Towcester CE Primary School
Towcester Library
Towcester Neighbourhood Watch
Towcester Town Council
Towcester Town Football Club
Towcester Veterinary Surgery
Town Centre CAAC
Town Centre Conservation Area
Town Planning Services
Transco
Transport Users Group
Traveller Law Reform Project
Trustees of Towcester Racecourse Limited
Tuckley Chester Design
Turley Associates
Turneys Farming
Turweston Flight Centre Ltd
Turweston Parish Council
Twentieth Century Society
Twigg & Associates Ltd
UK Growth Corridors and UK Strategic Land
UK Strategic Land , Danetree and Danetree Marches



UK Strategic Land and Burcote Business and Technology
UKSL
Underwoods
United Reformed Church
University of Northampton
Upper Heyford Parish Meeting
Upton Grange Residents Association
Upton Meadows Residents Association
Upton Parish Council
Vale Housing
Vernon Terrace Community Centre
Verres De Vin Wines Company
Video Inn Production
Virgin Trains
WA Fairhurst and Partners
Waitrose Stores Limited
Walgrave Parish Council
Walker Morris
Wantage Gospel Hall Trust
Wappenham Parish Council
Wardington Parish Council
Warkworth Parish Meeting
Warmingtons
Warrington Parish Council
Warwickshire County Council
Watermead Homes Ltd
Watford Parish Council
Weedon Bec History Society
Weedon Bec Parish Council
Welford Parish Council
Wellingborough Library
Welton Parish Council
West Haddon Parish Council
Westleigh Developments Ltd
Weston and Weedon Parish Council
Weston Favell Community Centre
Weston Favell Library
Weston Favell Shopping Centre
Weston Underwood Parish Council
Whilton Parish Council
White Mitchell Chartered Surveyors
White Young Green

Whitehills & Spring Park Residents Association
Whites Estates Agents
Whitfield Parish Meeting
Whittlebury Parish Council
Wicken Parish Council
Wilbraham Associates Ltd
Wildlife Trust
William Davis Ltd
Willoughby Parish Council
Willow Inns Limited
Wilson Bowden Developments Ltd
Wind Prospect Developments Ltd
Winwick Parish Meeting
WM Morrison Supermarket Plc
WNDC
Wolfhampcote Parish Council
Wolverton & Greenleys Town Council
Wolverton Library
Womens' Environmental Network (WEN)
Women's Institute
Women's National Commission
Wood Burcote Residents Association
Wood Frampton
Woodend Parish Meeting
Woodford Halse Information service
Woodford-cum-Membris Parish Council
Woodland Trust
Woods Hardwick Planning Limited
Woolf Bond Planning
Wootton and East Hunsbury Parish Council
Wootton Brook Action Group
Wootton Fields Library
Wootton Heritage Organisation
Wootton Parish Council
Wormleighton Parish Meeting
Wrenbridge
WSP Group Ltd
WYG Planning
Yardley Gobion Parish Council
Yardley Gobion Parish Council - Neighbourhood Plan Steering Group
Yardley Hastings Parish Council

Yelvertoft Parish Council
YMCA
Yorks Travel
Youth Offending Team
YPLA East Midlands
Zindgaini (Asian Mens Group)

## **Appendix 2 – List of public inspection locations**

### **Council Offices**

Daventry District Council - One Stop Shop  
Northampton Borough Council – One Stop Shop  
Northamptonshire County Council – County Hall  
South Northamptonshire Council – Springfields

### **West Northamptonshire Libraries**

Northamptonshire Central Library, Northampton  
Abington Library  
Brackley Library  
Brixworth Library  
Daventry Library  
Deanshanger Library  
Duston Library  
Far Cotton Library  
Hunsbury Library  
Kingsthorpe Library  
Long Buckby Library  
Middleton Cheney Library  
Moulton Library  
Roade Library  
St James Library  
Towcester Library  
Weston Favell Library  
Woodford Halse Library  
Wootton Library

### **Adjoining Councils Libraries**

Banbury Library  
Buckingham Library  
Desborough Library  
Dunchurch Library and Information Centre  
Earls Barton Library  
Kettering Library  
Market Harborough Library  
Milton Keynes Central Library  
Newport Pagnell Library  
Olney Library  
Rothwell Library  
Rugby Library and Information Centre  
Stony Stratford Library  
Wellingborough Library  
Wolverton Library

### **Appendix 3 – Summary of responses**

The responses are summarised in the following table. A full version of each response is available via the West Northamptonshire Joint Planning Unit website at:

[http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN\\_CIL\\_DCSs\\_Consultation/listresponses](http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN_CIL_DCSs_Consultation/listresponses)

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EiP?	Response
Anglian Water	Would not expect there to be provision within CIL for wastewater.	DDC, NBC & SNC.	-	Response noted.
Ashton Parish Council	No comment.	SNC	No	Noted.
Aylesbury Vale District Council	No comment.	-	-	Noted.
Bidwells (on behalf of Davidsons Developments)	<ul style="list-style-type: none"> <li>- Oppose £150 and £200 residential rural rates</li> <li>- Maximum recommended rate.</li> <li>- No decision on JCS yet.</li> <li>- How Schedules meet Regulation 61(3) is unclear.</li> <li>- Mandatory relief under Regulation 43 is supported.</li> <li>- Low cost market housing should be entitled to relief.</li> <li>- It is requested that relief for exceptional circumstances is made available.</li> <li>- Any changes made to the R123 prior to EiP should be consulted upon.</li> <li>- An objection is raised to the timing of provision of infrastructure on the R123 List.</li> <li>- Provision for Education needs to be clearly stated to avoid uncertainty and double-counting.</li> <li>- Public art is too broad, should not be on the R123 List.</li> <li>- Fire and rescue should not be on the R123 List.</li> </ul>	DDC & SNC.	Yes	<p>Development of a Charging Schedule can be completed in tandem with the advancement of a Development Plan.</p> <p>It is anticipated that adoption of the Joint Core Strategy will precede the Examination of the Charging Schedules.</p> <p><b>From DDC:</b> The Council considers that its R123 list entries for education are entirely clear.</p> <p><b>From SNC:</b> SNCs position on Education will be clearly stated, and if Primary Education is removed from R123 List, would not, in SNC’s opinion, necessitate re-consultation.</p> <p>The R123 does not identify the timing of infrastructure delivery. The R123 list and the IDP will be kept under review and will be</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<ul style="list-style-type: none"> <li>- Support Instalment Policy but:               <ul style="list-style-type: none"> <li>- Need information on the impact on development viability arising from the impact on cash flow for development.</li> <li>- Request an additional number of instalment periods.</li> <li>- Object to uncertainty over the status of the policy and request this be the subject at EIP.</li> </ul> </li> <li>- CIL rates are not supported by the evidence. No information on why maximum is being proposed.</li> <li>- The Viability Report recommends a review of CIL in 2016 but no commitment from charging authorities.</li>   <li>- Authorities should strike an appropriate balance. No clear indication that this has been done.</li> <li>- Our experience that landowners are not willing to accept less than £200,000 per acre.</li> <li>- There is no-adequate explanation as to how the consultants have accounted for contributions and localised s278 works.</li> <li>- Concern that costings are an under-estimate.</li> </ul>			<p>revised as and when appropriate including appropriate consultation.</p> <p><b>From DDC:</b> It is not considered that exceptional circumstances are sufficiently likely to arise in the District to justify the uncertainty and complexity that offering exceptional circumstances relief would entail.</p> <p><b>From SNC:</b> Exceptional circumstances relief is under consideration.</p> <p><b>From DDC:</b> The Council considers that the proposed charges represent an appropriate balance between the two considerations. The viability work demonstrates that the charges will not in most cases prevent development coming forward; this is assisted further by the instalments policy and DDC’s approach to the R123 list, which limits the scope of S106 contributions. Development will generate a substantial need for new infrastructure and it is reasonable for part of this need to be met via CIL.</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>Base Land Value – If the landowners will only accept c £200,000 per acre then the SUEs will only be viable if sale values are materially higher than tested or the enabling costs materially lower. GVA understand that the SUE assumptions are in line with the appraisals submitted with planning applications including the base land value assumptions. GVA also note that their figures are consistent with that of Three Dragons for the Affordable Housing Viability Study.</p> <p>S106 and Enabling Works are assumed to include S278 Costs.</p>
Brackley Town Council	<ul style="list-style-type: none"> <li>- A422 should be included on R123 List.</li> <li>- CIL should only be applied to developments too small for a s106 agreement.</li> </ul>	SNC	No	<p>SNC has no published evidence base which identifies improvements to the A422 as a result of the proposed growth.</p> <p>Projects to improve the A422 are not currently included within the Infrastructure Delivery Plan (IDP). However, it is recognised that the IDP is a living draft and subject to annual updates. If the highways authority consider that improvements to the A422 are necessary then these can be considered for</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>future IDP updates.</p> <p>It is also recognised that the R123 List is not exhaustive.</p>
<p>Brafield on the Green Parish Council</p>	<ul style="list-style-type: none"> <li>- How is it cost effective for each of the districts to administer separate Schedules? Must be cost benefits of JPU or County level working. Pool expertise and genuinely work together.</li> <li>- Joint working essential in determining a fair allocation of CIL where 1) there is a demonstrable need to allocate monies over more than one district and 2) in relation to cross boundary infrastructure.</li> <li>- SNC has not highlighted information to the Parishes and the recent County Newsletter did not highlight the consultation. Partners need to start acting together.</li>   <li>- Councils should extend remit to encompass the community benefit obligations associated with wind and solar farm planning applications.</li> <li>- Monitoring of funding should be completed jointly.</li> <li>- Should consider use of CIL to encourage sustainable development. i.e. Discounting elements of applications providing sustainable energy.</li> <li>- SNC Draft R123 should have a generic entry for neighbourhood %.</li> </ul>	<p>DDC, NBC &amp; SNC.</p>	<p>No</p>	<p><u>Joint working</u></p> <p>The partner Councils have a history of joint working and have collaborated on the evidence base to identify appropriate CIL rates.</p> <p>The joint collection of CIL revenue was considered by officers but ultimately, as the Councils are responsible for the collection of s106 monies on an individual basis and have their own accounting and debt recovery functions, it was considered more cost effective to retain individual collection processes which can align with the systems already in place.</p> <p>The Councils already have joint annual monitoring processes in place and it is intended that CIL will also be monitored in this way.</p> <p>The Councils are committed to the</p>



**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>- Reducing the allocated % to Parishes without a Neighbourhood Plan is unfair and unreasonable.</p>			<p>continuation of joint working and are collaborating on Governance arrangements to ensure that the issues of cross boundary infrastructure provision are addressed.</p> <p><u>Discounting</u></p> <p>The law does not permit variation in CIL rates for policy objectives (such as sustainable energy)</p> <p><u>Community Benefits</u></p> <p>It is not clear what this suggestion entails. CIL is a specific charge (tax) on developments and cannot be extended to perform other functions.</p> <p><u>The R123 List</u></p> <p>The Neighbourhood contribution is not in itself an infrastructure project and should not therefore be included in the R123 list</p> <p><u>Neighbourhood Contribution</u></p> <p>The Neighbourhood contribution of 15% for a Parish without an adopted Neighbourhood</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				Plan is set out in law and cannot be changed by the Councils.
Brixworth Parish Council	<ul style="list-style-type: none"> <li>- Would welcome clarification of the position of registered charities in relation to CIL.</li> <li>- Town Centre parking should be extended to include villages.</li> <li>- No reference to Primary Schools, health care or policing ~ should these not be included?</li> <li>- 40% affordable housing seems excessive, is this correct?</li> <li>- Take a favourable view of CIL, in view of flexibility it offers. Its effectiveness will depend on implementation.</li> <li>- Disbursement of funds is of major importance.</li> <li>- 25% neighbourhood portion should be increased to 40%.</li> </ul>	DDC	No	<p><u>Registered Charities</u></p> <p>A charitable institution which owns a material interest in the land (a charity landowner) will get full relief from their share of the liability where the chargeable development will be used ‘wholly, or mainly, for charitable purposes’ and they meet the requirements of the Regulations.</p> <p>Relief must not be claimed as a way of avoiding proper liability for the levy. Any relief must be repaid, a process known as ‘clawback’, if a ‘disqualifying event’ (defined in Regulation 48) happens within seven years of the commencement of the chargeable development.</p> <p><u>Town centre parking</u></p> <p>Car parking in villages could be delivered through section 106 agreements rather than CIL as there will be less schemes contributing towards a particular project and it will not</p>

Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>therefore be affected by the limit of 5 or more schemes contributing.</p> <p><u>Other services</u></p> <p>Primary Schools, health care and policing are intended to be funded through site specific negotiations and s106 agreements. The R123 List provides an indication of projects likely to be wholly or partly funded by CIL only.</p> <p><u>Affordable housing</u></p> <p>The Joint Core Strategy, as submitted, provides for 40% affordable housing in the rural areas.</p> <p><u>Parish Element</u></p> <p>The parish element is set out in national legislation and the Councils cannot change it.</p>
Bugbrooke Parish Council	In favour of CIL regime which it is felt will better provide for facilities in the village than is achieved through s106.	SNC	No	Response noted.
Butler, Ms. S.	- If a village has already fulfilled its affordable housing quota why should a developer then pay	DDC	Yes	<u>Affordable housing</u>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>more per sq metre?</p> <ul style="list-style-type: none"> <li>- R123 is too town centric. No benefits for rural areas.</li> <li>- There is no information in the papers on when the CIL share will be paid to a Parish Council.</li> <li>- Government and County Council should be delivering strategic infrastructure – not developers.</li> <li>- Consultation is very difficult to follow. Too complicated.</li> </ul>			<p>Affordable housing is exempt from payment of CIL.</p> <p>As factual background, there is no fixed quota at the village level for affordable housing. The affordable housing policy of the Joint Core Strategy, as submitted, requires a proportion of affordable housing to be provided on all sites above the size threshold set within the policy having regard to need and viability.</p> <p><u>R123 List</u></p> <p>The draft R123 list includes elements that will benefit both the rural areas and the town, such as public transport. Additional measures for villages will be secured, where appropriate, through section 106 agreements. The local community can also use its share of CIL to fund local schemes.</p> <p><u>Parish Payments</u></p> <p>Charging authorities and parish councils are</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>free to decide the timing of neighbourhood funding payments themselves. However, in the absence of such an agreement, the CIL Regulations specify that the neighbourhood portion of levy receipts must be paid every six months, at the end of October and the end of April.</p> <p><u>Delivering infrastructure</u></p> <p>The Partners work closely with the Government, County Council and other agencies to identify funding opportunities across a broad spectrum. Primary Schools, health care and policing are intended to be funded through site specific negotiations and s106 agreements where this is appropriate.</p> <p><u>The CIL Process</u></p> <p>The Partners recognise that CIL is a complicated process and have aimed the Guides on the website at addressing Frequently Asked Questions. Councillors</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				have also been briefed.
Byfield Parish Council	<ul style="list-style-type: none"> <li>- CIL should be much higher on all residential rural zone development above the affordable housing threshold as the proportionate cost of maintaining sustainability, services, roads is much higher in villages and rural areas.</li> <li>- R123 Lists should provide for maintenance of local sustainability, eg provision of local employment possibilities, nearby road improvements made necessary by overall traffic increases etc.</li> <li>- Instalment Policy – what provision is made against bad debts?</li> <li>- Is sufficient attention paid to the cumulative costs of smaller developments?</li> <li>- It should be clearly shown how sustainability is achieved by the CIL.</li> </ul>	DDC & SNC	No	<p><u>The rural residential charge</u></p> <p>Charging authorities are required to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact upon the economic viability of development across their area. It will be noted that developers have an opposite view to the Parish Council on this issue. The Council considers that the charges proposed achieve that balance at this time.</p> <p><u>The R123 List</u></p> <p>The R123 list is designed to capture impacts of development which spread over a wide area. For more local impacts the use of S106 agreements will still be possible and it is the preferred approach for e.g. primary schools.</p> <p>Parish councils will also be able to use their share of CIL income on anything which deals with the impact of development on their area. This could include the items suggested.</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EiP?	Response
				<p><u>Instalment Policy</u></p> <p>The CIL Regulations outline a number of enforcement procedures which include: surcharges for late payments; prohibiting the continuation of development until payment is made; and in extreme circumstances seizing assets and prison. Bad debts are therefore unlikely.</p> <p><u>Cumulative costs and sustainability</u></p> <p>Because CIL is a per-unit-area charge it enables the collection of contributions from development which would not be identified as having specific impact for the purposes of S106 agreements. It is therefore much better placed to manage cumulative impacts.</p> <p>Throughout the development of the Joint Core Strategy, as submitted, the partner Councils have liaised with service providers to determine the cumulative effects of development across West Northamptonshire</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				and beyond. This ensures that the area is developed in a sustainable way.
<p>CLA (Country Land and Business Association Ltd)</p>	<ul style="list-style-type: none"> <li>- Rural needs are not adequately addressed.</li> <li>- Schedules should make it clear that agricultural businesses and rural diversification are zero rated.</li> <li>- No clear mention of how buildings erected for agriculture, horticulture and forestry are to be dealt with. Should be specifically added as a zero charge.</li> <li>- No clear mention that dwellings erected to house an agricultural worker or the development of farm shops will be zero rated.</li> <li>- Individual applications should be considered within the Instalment Policy.</li> <li>- Charging authorities should offer exceptional relief to maximise flexibility.</li> </ul>	<p>DDC, NBC &amp; SNC</p>	<p>No</p>	<p><u>Rural needs</u></p> <p>Noted, but the DCS clearly states that all uses other than residential and retail are zero-rated.</p> <p><u>The Charging Schedules</u></p> <p>CIL Guidance supports the need to simplify CIL Charging Schedules. The Schedules clearly state which types of development would be CIL liable. The inclusion of use classes exempt from the CIL charge would appear to be an onerous task and quite unnecessary.</p> <p>Dwellings erected to house agricultural workers or the development of farm shops are not CIL exempt.</p> <p><u>Instalment policy</u></p> <p>It is assumed that the response refers to</p>



**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>small applications, rather than individual applications. The application of an instalment policy for small applications would lead to the introduction of an overly complicated charging regime which would prove extremely difficult to implement and manage.</p> <p><u>Exceptional relief</u></p> <p><b>From DDC:</b> It is not considered that exceptional circumstances are sufficiently likely to arise in the District to justify the uncertainty and complexity offering exceptional circumstances relief would entail.</p> <p><b>From NBC and SNC:</b> The Councils are determining the most appropriate approach for their districts.</p> <p>The approach proposed has been to adopt a Nil charge as buildings are required as part of the agricultural business and not able to be valued as standalone developments.</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>GVA do not consider that this would apply to barn conversions to residential use, which can give rise to the need for types of infrastructure covered by CIL such as education. GVA have seen no persuasive case that would meet the 'State Aid' test why these should be treated differently to other residential development and command a nil charge. However, in practice the reuse of existing building may mean that the development is able to set off the existing gross internal area if the building meets the previous occupation test. Likewise for farm shops.</p> <p>In relative terms the number of applications received for new housing with an agricultural occupancy condition is likely to be relatively small and on that basis it is not necessary to do bespoke testing and the current relevant CIL will apply. It is possible that such applications could qualify for the exemption as self- build homes in some cases.</p>
Cogenhoe &	Unable to make an informed comment due to lack of	SNC	No	Response noted. SNC officers recognise that

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
Whiston Parish Council	information.			CIL is a complicated process and have aimed the Guides on the website at addressing Frequently Asked Questions. Members and Parish Clerks were also invited to attend briefing sessions.
Cold Higham Parish Council	<ul style="list-style-type: none"> <li>- Appears that levy is disproportionately weighted against rural developments.</li> <li>- If adopted the Parish Council would like to be consulted and considered in how the levy revenue was utilised in their local area.</li> </ul>	SNC	Yes	<p>Charging authorities should use appropriate evidence to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact upon the economic viability of development across their area. Viability evidence indicates that residential development in the rural areas is much more viable than that located in the urban areas. The Councils also recognise that smaller developments can make a valuable contribution toward their cumulative impact on local infrastructure.</p> <p>Any significant future amendment to the R123 List would be subject to public consultation.</p>
Deanshanger Parish Council	<ul style="list-style-type: none"> <li>- Agree that all developments should pay CIL.</li> <li>- Agree that developments below affordable housing threshold should pay more.</li> <li>- Concern that figures suggested may result in</li> </ul>	SNC	No	<p>Support noted.</p> <p><u><a href="#">The CIL Rates</a></u></p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>developers arguing that development is unviable.</p> <ul style="list-style-type: none"> <li>- R123 List should be more clear on whether listed projects are to be funded by CIL or s106.</li> <li>- There should be a consultation with District and Parish Councils when the annual review of the R123 List is undertaken.</li> <li>- Instalment Policy should not be allowed and payments beyond 30 days of commencement should be subject to interest at 8% over base rate as a minimum.</li> <li>- Prefer s106. Important that s106 are agreed by local community prior to consent.</li> <li>- Accept that CIL is able to fund infrastructure in a way not possible by s106.</li> <li>- Passing (capped) 15% to Parishes is unfair when those with a Neighbourhood Plan get 25%.</li> <li>- Infrastructure funding by CIL should not affect infrastructure funding by central Government.</li> <li>- If CIL is unpaid, who is liable when the land is sold?</li> </ul>			<p>Charging authorities should use appropriate evidence to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact upon the economic viability of development across their area. The proposed rates are supported by professional viability evidence.</p> <p><u>R123 List</u></p> <p>The R123 List indicates those projects likely to be wholly or partly funded by CIL. Projects named on this list would not be eligible for funding through s106 agreement.</p> <p>Any significant future amendment to the R123 List would be subject to public consultation.</p> <p><u>Instalment Policy</u></p> <p>The Partner Councils recognise that larger developments would be difficult to fund if</p>

Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>the total CIL liability were required immediately on commencement. Some S106 agreements are developed to enable a phased payment process which reflects the increasing demand on infrastructure as a site develops.</p> <p>The current s106 process is a detailed and complex process which balances the financial viability of sites with the need for infrastructure.</p> <p><u>Neighbourhood contribution</u></p> <p>The Neighbourhood contributions are set out in national legislation. The partner Councils work closely with the Government, County Council and other agencies to identify funding opportunities across a broad spectrum.</p> <p><u>Unpaid CIL</u></p> <p>The collecting authority must serve the liability notice on the person(s) who have</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>assumed liability to pay, the owners of any material interest in the relevant land and the person who applied for the planning permission or submitted the notice of chargeable development. The person(s) may change if the land is sold.</p> <p>The CIL Regulations outline a number of enforcement procedures.</p>
Deanshanger Village Heritage Society	<ul style="list-style-type: none"> <li>- SNC should not adopt a CIL. Smaller share likely for local community than under s106. S106 agreements are much clearer as to how money is to be spent. S106 works.</li> <li>- Items in the R123 List are the responsibility of the Highways Agency.</li> <li>- Site specific work should be negotiated separately.</li> </ul>	SNC	No	<p>Do not agree that a ‘smaller share’ of developer contributions is likely for local communities, than under S.106. No evidence to support this view.</p> <p>It is fair and reasonable that developers contribute towards projects required as a result of growth.</p> <p>A number of site specific projects will be negotiated separately.</p>
DLP (on behalf of Hampton Brook)	<ul style="list-style-type: none"> <li>- Support the proposals to rate employment as a nil contribution.</li> <li>- It is our understanding that the Daventry Development Link will be wholly funded by CIL contributions but that s106 contributions will be sought by SNC from Midway Park for works</li> </ul>	SNC	No	<p>Support noted.</p> <p>Within the area of SNC, it is intended that contributions will be sought through s106 for appropriate and reasonable</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
	necessary to enable the site to be developed. In these circumstances we support the approach.			contributions towards the Daventry Development Link and M1 Junction 16 improvements.
Dryden, Mr. J.	<ul style="list-style-type: none"> <li>- Developers funding infrastructure seems sensible.</li> <li>- All affordable housing should be exempt.</li> <li>- R123 Lists seems limited in its scope.</li> <li>- Consultation is difficult to follow.</li> </ul>	NBC	No	<p>Support noted.</p> <p>Affordable housing is exempt.</p> <p>The R123 List represents projects likely to be wholly or partly funded by CIL but is not exhaustive.</p> <p>SNC officers recognise that CIL is a complicated process and have aimed the Guides on the website at addressing Frequently Asked Questions. Members and Parish Clerks were also invited to attend briefing sessions.</p>
Duston Parish Council	- Duston will be greatly affected by neighbouring development. CIL funds should be set aside from those developments for improvements in and around Duston. Important that crossover of these monies be considered.	DDC,NBC, &SNC	-	The Councils are committed to the continuation of joint working and are collaborating on Governance arrangements to ensure that the issues of cross boundary infrastructure provision are addressed.
English Heritage	<ul style="list-style-type: none"> <li>- No detailed comments on Charging Schedules.</li> <li>- Advise that authorities identify the ways in which CIL and other funding mechanisms can be used to</li> </ul>	DDC, NBC & SNC.	Yes	The Councils are committed to the continuation of joint working and are collaborating on arrangements for future CIL

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>implement the strategy and policies of the Local Plan.</p> <ul style="list-style-type: none"> <li>- Items on the R123 Lists can include historic structures, buildings and archaeology.</li> <li>- Hope that neighbourhood proportion can benefit historic environment.</li> <li>- Would be helpful to understand how funds/revenue will be spent.</li> <li>- Important that CIL does not discourage schemes being brought forward for the reuse of buildings at risk.</li> <li>- Conditions and procedures for relief should be set out in a separate statement.</li> </ul>			<p>processes. The Partners work closely with the Government, County Council and other agencies to identify funding opportunities across a broad spectrum.</p> <p>The R123 List can only contain items which meet the requirements of the Regulations for CIL expenditure. Heritage related costs, where appropriate, can be sought via S106 agreements.</p> <p>The Councils are considering the conditions and procedures for relief and will make these available at the appropriate stage.</p>
Environment Agency	<ul style="list-style-type: none"> <li>- Support the Schedules.</li> <li>- Keen to explore whether the CIL can be used to repair failing flood defences. We would welcome the opportunity to meet to understand this further.</li> </ul>	DDC, NBC & SNC.	No	<p>Support noted.</p> <p><b>From DDC:</b> Failing flood defences are not an obvious choice to fund from CIL as they are failing irrespective of development taking place. In those cases where specific flood defences require upgrading to enable development to take place, suitable provision can be made is a S106 agreement.</p> <p><b>From NBC &amp; SNC:</b> The R123 List indicates</p>



Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>those projects likely to be wholly or partly funded by CIL and is not exhaustive.</p> <p>The Councils will work with service providers to identify projects which can be funded by CIL and prioritise accordingly.</p> <p>The Infrastructure Delivery Plan is updated annually. A pro forma is sent to service providers to enable the identification of projects considered necessary to support the delivery of the Joint Core Strategy.</p>
<p>GL Hearn (on behalf of Gladman Developments)</p>	<ul style="list-style-type: none"> <li>- Detailed summaries should be presented of the modelling work. Unable to comment without more detail.</li> <li>- Lowest value areas have residential sales values around 36% lower than the highest level rural areas. Towcester and Brackley have been identified as medium value areas, 12% lower than the highest value rural areas although the same CIL level proposed as the low value areas.</li> <li>- Wide differentials between the proposed CIL zones has the potential to distort the market.</li> <li>- The charges are too high and do not strike an appropriate balance between the need to fund infrastructure and economic viability.</li> <li>- Allowances made for net site areas are insufficient</li> </ul>	<p>DDC, NBC &amp; SNC.</p>	<p>-</p>	<p><u>Striking an appropriate balance</u></p> <p>This will be addressed in further detail by the partner Councils in the Background Papers which will accompany the submission of the Draft Charging Schedules</p> <p><u>Comments on individual assumptions</u></p> <p>GVA provided detailed comments to the JPU in July 2013 on a number of points raised by GL Hearn which were incorporated into the</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>(respondent provides examples).</p> <ul style="list-style-type: none"> <li>- Residential forecasting should be based on current values and costs.</li> <li>- Base land value is set far too low.</li> <li>- BCIS build costs under assess current build costs.</li> <li>- External works assumption too low, normally adopted at 15 to 20% of the base construction cost.</li> <li>- Marketing fees too low, should be 4% as a minimum.</li> <li>- Discount from marketing prices should be adopted.</li> <li>- Need to understand build out rates for all appraisals.</li> <li>- Should include 1% arrangement fee, monthly monitoring fees and 1% of GDV as exit fee.</li> <li>- Professional fees for SUEs too low.</li> <li>- Development contingency for SUEs too low.</li> <li>- Ground rent income should be removed.</li> <li>- S106 assumptions not a true reflection of the overall costs placed on development should the CIL be introduced at the levy rates proposed.</li> <li>- Would like to engage in further discussion with the council and their advisors.</li> <li>- Respondent provides analysis of scenarios in appendices.</li> </ul>			<p>statement of consultation for the Preliminary Draft Charging Schedules. These comments stand. The assumptions GVA have adopted are consistent with, or in some cases higher than (e.g. base land value and profit) the assumptions employed by the “Three Dragons” testing for the West Northamptonshire Joint Core Strategy’s affordable housing policy.</p> <p><u>Testing in Rural Areas</u></p> <p>The base assumptions were discussed and agreed with the JPU and were presented at a stakeholder meeting in July 2012 before testing commenced. The comments made at that time were taken into account. GL Hearn were not present but were invited. The form of development referenced by GL Hearn is materially different from that adopted as it assumes the redevelopment of existing housing and/or gardens, and inevitably would result in bigger and more expensive housing being built in order to recoup the cost of the original land and buildings. The</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EiP?	Response
				<p>figures that would follow from this have not been tested, but we note that any existing GIA can potentially be offset, if it meets the occupancy test. We note the reference to asking prices for land but we have sought an approach that is consistent with the Harman Report or EUV plus.</p> <p>GVA's analysis of the sale prices achieved in 2011 &amp; 2012 suggests a mixed picture in terms of the scale and type of development in the Villages. In those instances where there is only a single sale (10 out of 22) 4 are at a discount to the average sale prices for previously owned properties. For 2 or more new sales the figure is 5 out of 12. The weighted average new sale price is £307,000 is materially greater than the figure GVA adopted c 30% (£236,000).</p> <p>The values of the individual villages have been considered in detail given the Land Registry data that has been assembled and analysed. We have sought to avoid a multiplicity of different charging areas in line</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>with the Guidance that a CIL should avoid being unnecessarily complex.</p> <p>The desire by the respondent to engage in further discussions is noted.</p>
Hardingstone Parish Council	<ul style="list-style-type: none"> <li>- The Parish Council are happy with the charging schedule, but they are unable to comment on viability projections as they do not have the expertise.</li> <li>- The bus station is inadequate and should remain in the IDP for future improvements.</li> <li>- Any flexibility that isn't a legal requirement should not be offered.</li> <li>- Should not allow optional exemption.</li> <li>- Payment in kind should only be allowed if the land is useful to the local community and independently valued.</li> </ul>	NBC	No	<p>Response noted.</p> <p>The Northampton Northgate bus station was removed from the IDP in 2013 as at the time of publication the development was near completion. Northgate bus station commenced operation in Spring 2014. The IDP includes a range of additional infrastructure projects to promote travel by bus.</p> <p>The partner Councils recognise that larger developments would be difficult to fund if the total CIL liability were required immediately on commencement. Some S106 agreements are developed to enable a phased payment process which reflects the increasing demand on infrastructure as a site develops.</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>The partner Councils are considering their approach to exemption.</p> <p>It is noted that any agreement to consider a payment in kind would need to be carefully considered by the Council.</p>
Hartwell Parish Council	Agree with increased residential rural charge of £200 per sqm.	SNC	No	Support noted.
Highways Agency	Welcome inclusion of NGMS on R123 Lists.	DDC, NBC & SNC.	-	Support noted.
Hollowell & Teeton Parish Council	R123 List - “Infrastructure types or projects that are listed below will not be secured through planning obligations” and “The list below sets out those infrastructure elements that DDC currently intends will be, or may be, wholly or partly funded by CIL” – is this a conflict of Policy? Should first section refer to s106?	DDC	No	The R123 List indicates those projects likely to be wholly or partly funded by CIL. These projects would not be eligible for funding through planning obligations, sometimes referred to as s106 agreements. For clarity, planning obligations are made under Section 106 of the Town and Country Planning Act 1990, and thus references to ‘planning obligations’ and ‘Section 106 agreements’ or ‘s106’ are to the same thing.
Kilvert, Mr. R.	<ul style="list-style-type: none"> <li>- Require further clarification of the boundaries for the zones. Some areas around Towcester are built up but are shown as rural.</li> <li>- SNC should give more thought to the way in which</li> </ul>	SNC	No	The submission of the CIL charging schedules will include detailed Ordnance Survey maps indicating the Charging Zones. It is accepted

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>communities in villages south of Northampton and Towcester would be helped.</p> <ul style="list-style-type: none"> <li>- SNC should clarify whether they are intending to implement a CIL or not to enable Parishes to engage.</li> </ul>			<p>that the boundary of the charging zone for Towcester should be amended to accurately reflect the urban area as defined by the South Northamptonshire Local Plan.</p> <p>SNC has indicated that it cannot make a properly informed decision on whether or not it will be adopting a CIL until after the Joint Core Strategy has been adopted and after the independent Examination in Public of the Charging Schedule.</p>
Kings Sutton Parish Council	<ul style="list-style-type: none"> <li>- We support the varied rates and the basis for these.</li> <li>- All developments should be subject to the charge irrespective of the number of houses.</li> <li>- Instalment Policy is sensible.</li> <li>- Concerned that CIL for one area may be used for the benefit of another.</li> </ul>	SNC	No	<p>Support noted.</p> <p>All residential and retail developments in the area of South Northamptonshire would be liable for CIL.</p> <p>The Councils are committed to the continuation of joint working and are collaborating on Governance arrangements to ensure that the issues of cross boundary infrastructure provision are addressed. It is important that the effects of growth are addressed through the timely delivery of</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				infrastructure.
Maidford Parish Council	<ul style="list-style-type: none"> <li>- The higher levy for rural areas will lead to increased unaffordability in rural areas.</li> <li>- A buyer in a low-cost house wishing to move to a larger property in a rural area will be forced to move into an urban area due to the higher levy rate.</li> <li>- Developers will seek to maximise the size of property they will build as the Levy will represent a lower % of the selling price.</li> <li>- Levy should not just fund infrastructure in urban areas.</li> <li>- Propose flat rate of £70 per sq m across all developments. Reflects balance of development between urban and rural areas.</li> </ul>	SNC	No	<p>The levy is not paid by the house purchaser but by the owner/developer of the land. The viability evidence illustrates through the residual valuation method that residential and retail development across South Northamptonshire can support the CIL charge. The CIL will be used to fund infrastructure and local facilities to support the growth of the area.</p> <p>The viability evidence indicates that residential development in rural areas can support a higher charge. The Council has balanced the potential charge with the need to deliver supporting infrastructure. The R123 List indicates those projects likely to be wholly or partly funded by CIL and is not exhaustive.</p>
Milton Malsor Parish Council	<ul style="list-style-type: none"> <li>- Supportive of CIL</li> <li>- R123 List should be flexible or specific items villages want may be refused.</li> <li>- We support local areas having a % of the funds.</li> </ul>	SNC	No	Support noted. The R123 List indicates those projects likely to be wholly or partly funded by CIL and is not exhaustive.
Moulton Parish Council	<ul style="list-style-type: none"> <li>- Items on R123 List are all irrelevant. Some have no impact on the development of this area. Add community buildings.</li> </ul>	DDC	Yes	There are elements of the R123 list that could benefit Moulton, including leisure

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<ul style="list-style-type: none"> <li>- CIL should be used for communities accepting development, not for generic town centre improvements miles away.</li> <li>- Concerned that the majority share of the CIL will go to the charging authorities.</li> <li>- Comments on errors in IDP.</li> </ul>			<p>facilities.</p> <p>The R123 List indicates those projects likely to be wholly or partly funded by CIL. These are generally items which it is not suitable to fund from planning obligations (especially once the limit on ‘pooling’ of planning obligations comes into force). Local matters will still be addressed through planning obligations. The local community can also use its share of CIL to fund local schemes.</p> <p>The parish element of CIL is set out in national legislation and cannot be changes by the Council. It is necessary for the Councils to identify strategic infrastructure to deliver the growth identified in the Joint Core Strategy, as submitted.</p> <p>The comments on the IDP will be addressed in future updates.</p>
Natural England	Welcome the inclusion of Open Space and Green infrastructure projects in the CIL Background Papers.	-	-	Support noted.
Northampton Borough Council	A more focused R123 List would provide a clearer focus on major infrastructure projects, particularly	DDC	Yes	CIL is a local charge and designed to respect the different circumstances of different



**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>where there are cross boundary implications.</p>			<p>areas. The Council is satisfied that its proposed R123 list properly identifies schemes that should be funded through CIL for its District. The list proposed has the merit of giving greater clarity to landowners and developers about the sums they will be required to contribute and simplifies the process of granting planning permission. The Council is committed to the continuation of joint working and is collaborating on arrangements to ensure that the issues of cross boundary infrastructure provision are addressed.</p>
<p>Northamptonshire County Council</p>	<ul style="list-style-type: none"> <li>- Infrastructure for flood and water management purposes has not been included. Evidence base on this should be assessed as part of the development of the CIL.</li> <li>- R123 List:               <ul style="list-style-type: none"> <li>- Support approach to Primary Education.</li> <li>- Secondary Education should be caveated to exclude specific on site provision.</li> <li>- Support inclusion of NGMS.</li> <li>- North-West Bypass should indicate Phase 2.</li> <li>- A pared down list would be more beneficial.</li> </ul> </li> <li>- Instalment Policy: may be beneficial to offer the % amount at no less than 30%.</li> <li>- S106 assumptions do not accurately reflect current</li> </ul>	<p>DDC</p>	<p>Yes</p>	<p><u>R123 List</u></p> <p>The Council remains of the view that flooding and water management matters are best addressed through planning obligations, as typically each flood defence will relate to one or a smaller number of individual development sites. NCC has not provided any evidence to counter this view.</p> <p>The Council is of the view that it would be unlawful to use CIL to contribute towards</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>negotiations.</p> <ul style="list-style-type: none"> <li>- Meeting the funding gap requires further work.</li> <li>- Governance arrangements should be agreed as soon as possible for cross boundary projects.</li> </ul>			<p>secondary schools which are also funded by S106 contributions if NCC’s suggested approach on this matter was adopted. Therefore whilst it recognises the idea behind NCC’s suggestion it does not think it can be validly applied.</p> <p>The Council is most unlikely to have raised any contributions towards the North-West Bypass Phase 1 via planning obligations and as such the point is moot.</p> <p>The Council is satisfied that its proposed R123 list properly identifies schemes that should be funded through CIL for its District. The list proposed has the merit of giving greater clarity to landowners and developers about the sums they will be required to contribute and simplifies the process of granting planning permission.</p> <p><u>Funding Gap and Governance</u></p> <p>The Councils are committed to the continuation of joint working and are</p>

Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>collaborating on arrangements to ensure that the issues of cross boundary infrastructure provision are addressed. The Councils recognise the difficulties of infrastructure funding in a challenging economic climate and will continue to work closely with the Government, County Council and other agencies to identify funding opportunities across a broad spectrum.</p>
<p>Northamptonshire County Council</p>	<ul style="list-style-type: none"> <li>- Infrastructure for flood and water management purposes has not been included. Evidence base on this should be assessed as part of the development of the CIL.</li> <li>- R123 List:               <ul style="list-style-type: none"> <li>- Support pared down list.</li> <li>- Oppose approach to Primary Education. Should adopt approach of DDC.</li> <li>- Support inclusion of NGMS and North-West Bypass Phase 2.</li> </ul> </li> <li>- Instalment Policy: may be beneficial to offer the % amount at no less than 30%.</li> <li>- S106 assumptions do not accurately reflect current negotiations.</li> <li>- Meeting the funding gap requires further work.</li> </ul> <p>Governance arrangements should be agreed as soon as possible for cross boundary projects.</p>	<p>NBC</p>	<p>Yes</p>	<p><b>From NBC:</b> In principle, funds collected via CIL could contribute to the delivery of strategic infrastructure items relating to flood and water management, where such infrastructure is necessary to meet needs arising from new development. The IDP includes infrastructure items relating to waste water management to be funded through developer contributions, including Waste and Surface Water Infrastructure within Northampton Town Centre. At present, there is no clear strategy for such infrastructure; therefore no such items have been included on the R123 infrastructure list. There may be instances where it is</p>

Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>appropriate to secure on-site flood and water management through planning obligations.</p> <p><u>Funding Gap and Governance</u></p> <p>The Partners are committed to the continuation of joint working and are collaborating on Governance arrangements to ensure that the issues of cross boundary infrastructure provision are addressed. The Partners recognise the difficulties of infrastructure funding in a challenging economic climate and will continue to work closely with the Government, County Council and other agencies to identify funding opportunities across a broad spectrum.</p>
Northamptonshire County Council	<ul style="list-style-type: none"> <li>- Infrastructure for flood and water management purposes has not been included. Evidence base on this should be assessed as part of the development of the CIL.</li> <li>- R123 List:               <ul style="list-style-type: none"> <li>- Support pared down list.</li> <li>- Oppose approach to Primary Education. Should adopt approach of DDC.</li> <li>- Support inclusion of NGMS and North-West Bypass Phase 2.</li> </ul> </li> </ul>	SNC	Yes	<p><b>From SNC:</b> All comments and support for pared-down R123 List noted. SNC would not object to the exclusion of Primary Education from R123 List. Comment regarding S106 assumptions is not understood.</p> <p><u>Funding Gap and Governance</u></p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<ul style="list-style-type: none"> <li>- Instalment Policy: may be beneficial to offer the % amount at no less than 30%.</li> <li>- S106 assumptions do not accurately reflect current negotiations.</li> <li>- Meeting the funding gap requires further work.</li> </ul> <p>Governance arrangements should be agreed as soon as possible for cross boundary projects.</p>			<p>The Partners are committed to the continuation of joint working and are collaborating on Governance arrangements to ensure that the issues of cross boundary infrastructure provision are addressed. The Partners recognise the difficulties of infrastructure funding in a challenging economic climate and will continue to work closely with the Government, County Council and other agencies to identify funding opportunities across a broad spectrum.</p>
Network Rail	<p>The Council should consider the inclusion of the CIL being used for enhancements at railway stations as a result of increased footfall from both residential and business developments in addition to any highways or green infrastructure works.</p>	-	-	<p><b>From DDC:</b> The R123 list includes public transport which would enable works at stations to be covered if the need for this is identified.</p> <p><b>From NBC &amp; SNC:</b> The R123 List indicates those projects likely to be wholly or partly funded by CIL and is not exhaustive. The Partners will work with service providers to identify projects which can be funded by CIL and prioritise accordingly.</p> <p>The Infrastructure Delivery Plan is updated</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>annually. A pro forma is sent to service providers to enable the identification of projects considered necessary to support the delivery of the Joint Core Strategy.</p>
<p>NFU (National Farmers Union)</p>	<p>Propose addition to Charging Schedules to specifically identify a £0m<sup>2</sup> charge for agricultural buildings, agriculture tied housing, farm shops and barn conversions.</p>	<p>DDC, NBC &amp; SNC.</p>	<p>Yes</p>	<p>The approach proposed has been to adopt a nil charge as buildings are required as part of the agricultural business and not able to be valued as standalone developments. As agricultural buildings do not fit in either the ‘residential’ or ‘retail’ categories it is clear that they are subject to a nil charge.</p> <p>However, GVA do not consider that this would apply to barn conversions to residential use, which can give rise to the need for types of infrastructure covered by CIL such as education. We have seen no persuasive case that would meet the ‘State Aid’ test why these should be treated differently to other residential development and command a nil charge. However, in practice the reuse of existing building may mean that the development is able to set off the existing GIA if the building meets the</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>previous occupation test. Likewise for farm shops.</p> <p>In relative terms the number of applications received for new housing with an agricultural occupancy condition is likely to be relatively small and on that basis it is not necessary to do bespoke testing and that the current relevant CIL would apply. It is possible that such applications could qualify for the exemption as self-build homes in some cases.</p>
NHS England	<ul style="list-style-type: none"> <li>- The respondent would like to request that once the existing capacity is fulfilled, a charge of £621 per dwelling is applied to meet the needs of growing population relative to the primary care medical services.</li> <li>- The respondent provided a breakdown of the calculation.</li> </ul>	DDC, NBC & SNC	-	Viability evidence outlines the capacity of development to contribute towards a CIL charge. The split of this funding, and ultimately how the CIL revenue will be spent, will be determined by future Governance arrangements by the Partners.
Overstone Parish Council	<ul style="list-style-type: none"> <li>- Items on R123 List are all irrelevant. Some have no impact on the development of this area. Add community buildings.</li> <li>- CIL should be used for communities accepting development, not for generic town centre improvements miles away.</li> <li>- Concerned that the majority share of the CIL will go</li> </ul>	DDC	Yes	<p>There are elements of the R123 list that could benefit Overstone, including leisure facilities.</p> <p>The R123 List indicates those projects likely to be wholly or partly funded by CIL. These are generally items which it is not suitable to</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
	<p>to the charging authorities.</p> <ul style="list-style-type: none"> <li>- Comments on errors in IDP.</li> </ul>			<p>fund from planning obligations (especially once the limit on ‘pooling’ of planning obligations comes into force). Local matters will still be addressed through planning obligations. The local community can also use its share of CIL to fund local schemes. The parish element is set out in national legislation and cannot be changed by the Council. It is necessary for the Councils to identify strategic infrastructure to deliver the growth identified in the Joint Core Strategy, as submitted.</p> <p>The comments on the IDP will be addressed in future updates.</p>
Paulerspury Parish Council	15% of any CIL could be useful in safeguarding or enhancing existing community infrastructure or assets.	SNC	No	Response noted.
Pegasus (on behalf of Persimmon Homes & Bloor Homes)	<ul style="list-style-type: none"> <li>- Authorities should wait until they have an adopted Local Plan. Reference Runnymede.</li> <li>- In circumstances where any s173 application is subject to the CIL liability it will be necessary for the Local Planning Authority and the applicants to consider how the commitments to deliver under the s106 are to be assessed.</li> <li>- Council does not demonstrate how it strikes an</li> </ul>	SNC	Yes	<p>Development of a Charging Schedule can be completed in tandem with the advancement of a Development Plan.</p> <p>It is anticipated that adoption of the Joint Core Strategy will precede the Examination of the Charging Schedules.</p>



**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EiP?	Response
	<p>appropriate balance.</p> <ul style="list-style-type: none"> <li>- SUE rate not supported by evidence.</li> <li>- A £0m<sup>2</sup> CIL for low and medium value areas with affordable housing requirements reduced to 10%. JCS policy for affordable housing in unachievable.</li> <li>- S106 assumptions are unrealistic (Respondent outlines example of Towcester South).</li> <li>- The way Education is expressed on the R123 is double dipping.</li> <li>- To ensure delivery of strategically important sites the Schedule should be revised to reflect and properly consider the potential adverse impact on the delivery of SUEs and their extant s106 agreements.</li> </ul>			<p>Striking an appropriate balance - This will be addressed in further detail by the partner Councils in the Background Papers which will accompany the submission of the Draft Charging Schedules.</p> <p>Further consideration will be given on the wording relating to education in R123 Lists.</p> <p>The approach to the SUEs has been carefully considered by the partner Councils and GVA over the last 3 years. Any scheme that cannot afford £50 psm is effectively not viable or deliverable under current conditions, adopting current costs and values, so will not commence during the currency of the proposed current Charging Schedule. Given the large number of SUEs, including those proposed in adjoining authorities at North Northamptonshire JPU, Rugby, and the expansion of Milton Keynes, it is not likely that all the SUEs will commence within the life of the existing Schedule, nor is it anticipated by the Joint</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				Core Strategy.
Potterspurty Parish Council	R123 List should link to improvements at A5 at Potterspurty.	SNC	No	<p>SNC has no published evidence base which identifies improvements to the A5 at Potterspurty as a result of the proposed growth.</p> <p>Projects to improve the A5 at Potterspurty are not currently included within the Infrastructure Delivery Plan (IDP). However, it is recognised that the IDP is a living draft and subject to annual updates.</p> <p>If the highways authority consider that improvements are necessary then these can be considered for future IDP updates.</p> <p>It is also recognised that the R123 List is not exhaustive.</p>
Roade Parish Council	<ul style="list-style-type: none"> <li>- In favour of CIL but ask SNC to ensure that levels don't have a negative impact on the types of development on the [Roade] area.</li> <li>- For flats, does the charge relate to each floor or the area the flats are built on?</li> </ul>	SNC	No	<p>Support noted.</p> <p>Viability evidence supports the rates as proposed.</p> <p>Flats – the residential CIL liability is applied to the gross internal floorspace of the net</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				additional development.
Rugby Borough Council	No comment.	DDC	No	Response noted.
Savills (on behalf of the HBF)	<ul style="list-style-type: none"> <li>- The SUE rate is not supported by the viability work.</li> <li>- Non-policy compliant levels of affordable housing have been tested.</li> <li>- The assumptions adopted are inappropriate.</li> <li>- No evidence on the operation of s106 post CIL has been provided. Should be consulted on prior to Submission.</li> <li>- JCS was developed prior to the introduction of CIL.</li> <li>- The charging authorities do not have an up to date adopted Local Plan – pursuing CIL at this time is premature.</li> <li>- SUEs equate to 56% of total housing supply. Should be £0m<sup>2</sup> rated to support delivery of sizeable on-site policy requirements.</li> <li>- NBC rate should also be carefully reconsidered.</li> <li>- Further testing required to limit negative impact on windfall developments.</li> <li>- DDC R123 List – projects are included which do not support the development plan. List is unnecessarily complex.</li>   <li>- NBC R123 List – NGMS is a broad strategy containing items that could be brought forward under s106.</li> <li>- SNC R123 List – urge the Council to provide more</li> </ul>	DDC, NBC & SNC.	Yes	<p><u>Prematurity</u></p> <p>Development of a Charging Schedule can be completed in tandem with the advancement of a Development Plan.</p> <p>It is anticipated that adoption of the Joint Core Strategy will precede the Examination of the Charging Schedules.</p> <p><u>Striking the balance</u></p> <p>It should be noted that the SUEs do provide a considerable amount of the housing supply, even in the first 5 years, but it must also be considered that strategic infrastructure is required to support growth and the SUEs should be contributing towards this. This will be addressed in further detail by the partner Councils in the Background Papers which will accompany the submission of the Draft Charging Schedules.</p>

Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
	<p>detail in the use of s106 post-CIL, with particular focus on the use of planning obligations to secure Education.</p> <ul style="list-style-type: none"> <li>- Recommend that the 3 R123 Lists are the same for each authority to link it directly to the JCS.</li> <li>- The authorities should have a joint s106 SPD.</li> <li>- S106 assumptions are too low.</li> <li>- The viability report: <ul style="list-style-type: none"> <li>- Profit - The minimum acceptable profit margin for the Consortium is 20% on GDV blended across both the private and affordable dwellings.</li> <li>- Professional Fees – Minimum allowance of 10% should be adopted across all scenarios.</li> <li>- S106 costs - £10k per dwelling for SUEs should be tested.</li> <li>- SUE testing does not meet affordable housing policy.</li> <li>- Contingency – should be 5% on all sites.</li> <li>- Promotion costs should be included.</li> <li>- Require confirmation that 5.75% allowance for purchasers costs.</li> <li>- CFSH – allowance for zero carbon should be tested.</li> <li>- Site specific SUE appraisals should be undertaken. One scenario is not enough.</li> <li>- Report does not support SUE rate.</li> <li>- The respondent has provided appraisal work in their Appendices.</li> </ul> </li> </ul>			<p><u>R123 Lists</u></p> <p><b>From DDC:</b> DDC’s R123 list does not generally include ‘projects’ but in most cases type of infrastructure. The development industry should welcome this approach as it maximises certainty as the scope of CIL and thus, by exclusion, the scope of planning obligations. This should assist land negotiations and swift delivery of planning permissions. It is not clear in what way the R123 list is considered ‘complex’.</p> <p>CIL is a local charge and is designed to reflect the differing circumstances of different areas.</p> <p><b>From NBC &amp; SNC:</b> Further consideration will be given on the wording relating to education in R123 Lists.</p> <p><u>Instalment Policy</u></p> <p><b>From NBC and SNC:</b> Further consideration will be given to the implications of the</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<ul style="list-style-type: none"> <li>- Should consider £0m<sup>2</sup> for residential and retail on the SUEs.</li> <li>- The charging authorities should provide documentation on a number of post adoption criteria and processes (see response at 5.2 in the respondent’s full response).</li> <li>- Welcome an Instalment Policy, recommend an alternative (see response at 5.6 in the respondent’s full response).</li> <li>- Urge all Councils to make Exceptional Circumstances Relief available.</li> <li>- A review period of between 2 – 3 years from adoption should be publicly committed to by the Councils.</li> <li>- The Consortium is open to a meeting with the Councils ahead of the next stage.</li> </ul>			<p>suggested Instalment Policies.</p> <p><b>From DDC:</b> The instalment policy is considered to be an appropriate balance between assisting developers with cash flow issues and the need to draw in funding as soon as possible to enable delivery of infrastructure.</p> <p><u>Exceptional relief</u></p> <p><b>From DDC:</b> It is not considered that exceptional circumstances are sufficiently likely to arise in the District to justify the uncertainty and complexity offering exceptional circumstances relief would entail.</p> <p><b>From NBC &amp; SNC:</b> The Councils are determining the most appropriate approach for their districts.</p> <p><u>Governance and post adoption</u></p> <p>The Councils are committed to the continuation of joint working and are</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EiP?	Response
				<p>collaborating on arrangements to ensure that the issues of cross boundary infrastructure provision are addressed.</p> <p>The Councils will review their CIL rates when economic signals suggest they may have become in need of change.</p> <p><u>Other</u></p> <p>The desire of the consortium to discuss further is noted.</p> <p>A large number of the SUEs are consented. GVA have tested at 40% but in error these were omitted from the revised viability document. This error will be rectified.</p> <p>Site specific testing is not a requirement and raises issues around confidentiality. Each SUE will have site specific issues and cannot necessarily be used as a proxy for other sites.</p> <p>The testing of site typologies is appropriate and the assumptions used by GVA are</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>consistent with those that are used in reality for large schemes.</p> <p>It is inherent in such schemes that there will be phasing (often also this is used to set up S106 reviews) and the amendments in the 2014 Regulations provide authorities for the freedoms to acknowledge this.</p> <p>A number of the developers/landowners of the SUEs have submitted appraisals in support of their planning applications, but as these are commercial in confidence GVA do not have sight of them.</p> <p>Comments on individual figures – GVA are satisfied that their assumptions are reasonable.</p>
Savills (on behalf of Northampton University)	<ul style="list-style-type: none"> <li>- Concerned about effect of the proposed residential rate on housing delivery.</li> <li>- Clarification is required that the residential rate does not apply to student accommodation.</li> <li>- Not convinced Council has struck appropriate balance.</li> <li>- Further information from appraisals is required.</li> <li>- Unclear where ITZA has been used.</li> </ul>	NBC	Yes	<p>Striking an appropriate balance – This will be addressed in further detail by the partner Councils in the Background Papers which will accompany the submission of the Draft Charging Schedules.</p> <p>As is common for appraisals for retail</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
	<ul style="list-style-type: none"> <li>- Retail rate should be nil to ensure development is not rendered unviable. Notwithstanding this, there should be a distinction between different scales of retail development.</li> <li>- Avon Nunn Mills should be incorporated in central zone.</li> </ul>			development, not just for CIL, GVA have used an overall rental value. GVA have not seen any evidence to suggest that retail outside the central area is not viable in its own terms. Clearly there are occasions where it is proposed to help underpin the delivery of other uses eg a supermarket for a SUE (clearly all retail development has to meet other tests such as the sequential test). This has been considered by the Councils and they have decided to apply the results of the testing.
Shutlanger Parish Council	Unable to respond in any sensible way due to lack of information.	-	-	<p>Response noted.</p> <p>SNC officers recognise that CIL is a complicated process and have aimed the Guides on the website at addressing Frequently Asked Questions. Members and Parish Clerks were also invited to attend briefing sessions.</p>
Sport England	<ul style="list-style-type: none"> <li>- Evidence in support of IDP is out of date.</li> <li>- DDC R123 List – concerned that Indoor Sports should be displayed as per Outdoor Sports.</li> </ul>	-	-	<b>From DDC:</b> The Council’s view is that whilst it is reasonable to assume outdoor sports will, in part, be locally-specific and thus reasonably required via S106 agreements for on-site provision, indoor sports are more



Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>strategic in nature and accordingly should be a fully CIL based item. The R123 list is drafted on that basis.</p> <p><b>From NBC &amp; SNC:</b> The R123 List indicates those projects likely to be wholly or partly funded by CIL and is not exhaustive.</p> <p>The Councils will work with service providers to identify projects which can be funded by CIL and prioritise accordingly.</p> <p>The Infrastructure Delivery Plan is updated annually. A pro forma is sent to service providers to enable the identification of projects considered necessary to support the delivery of the Joint Core Strategy.</p>
Syresham Parish Council	<ul style="list-style-type: none"> <li>- Charging levels would appear to be acceptable. What is Class C3?</li> <li>- Instalment Policy makes sense.</li> <li>- Can we be assured that the accuracy of the consideration where it relates to future planned development (para 5.5 of the CIL Economic Viability Report)</li> <li>- What is there in the overall package on CIL/s106 to ensure that smaller rural communities are not disproportionately affected in a negative way?</li> </ul>	SNC	No	<p>Support noted.</p> <p>Class C3 is dwelling houses.</p> <p>The Joint Core Strategy, as submitted, is supported by a range of evidence studies. The key strategic projects are included within the Infrastructure Delivery Plan which is the principle infrastructure support</p>

### Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
	- How will rural areas benefit?			document for the CIL.
The Theatre Trust	Support the nil rate for 'All other uses'.	DDC, NBC & SNC.	-	Support noted.
Towcester Town Council	Broadly support the adoption of CIL.	SNC	No	Support noted.
Turleys (on behalf of Ashfield Land)	<ul style="list-style-type: none"> <li>- Object to Residential Rural Zone charge as too high.</li> <li>- Discretionary relief for exceptional circumstances should be clearly set out within the Charging Schedule.</li> </ul>	SNC	-	<p><u>Rural Zone Charge</u> See comments made in response to GL Hearn (on behalf of Gladman) above.</p> <p><u>Exceptional relief</u> SNC do intend to offer exceptional circumstances relief.</p>
Turleys (on behalf of Martin Grant Homes)	<ul style="list-style-type: none"> <li>- Oppose CIL on SUEs.</li> <li>- DCS for SNC does not include SUEs so there is no proposed charge for SUEs in SNC.</li> <li>- SUE charge should be £0m2.</li> <li>- Support £0m2 for all other uses.</li> <li>- GVA should test optimum approach to an Instalment Policy. Propose different Policy (see Table 2.1 in the respondent's detailed response).</li> <li>- The residential viability results demonstrate there is no viability of development when CIL is applied to the low and medium value areas.</li> <li>- To set CIL at a rate that potentially undermines affordable housing policy contradicts paras 173 – 175 of the NPPF.</li> </ul>	DDC, NBC & SNC.	Yes	<p>It is accepted that the DCS for SNC should include SUEs and the DCS will be amended accordingly.</p> <p><u>Instalment policy</u></p> <p><b>From NBC and SNC:</b> Further consideration will be given to the implications of the suggested Instalment Policies.</p> <p><b>From DDC:</b> The instalment policy is considered to be an appropriate balance</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<ul style="list-style-type: none"> <li>- Plan polices should be deliverable. Reference to the duration of affordable housing policy is irrelevant.</li> <li>- No evidence is published to demonstrate that the Councils have secured contributions on a regular basis from the range of sites in the range of locations proposed.</li> <li>- The proportion of construction cost or sales value that CIL represents is totally irrelevant if the charge pushes a marginal development into the realms of non-viability.</li> <li>- Reference to Trafford Council CIL EIP.</li> <li>- Absence of defined buffer.</li> <li>- Appropriate balance is not demonstrated.</li> <li>- Retention of the SUE rate will lead to lower levels of affordable housing.</li> <li>- Information on the scaling back of s106 obligations is not presented.</li> <li>- Should offer exceptional relief. DDC approach is not justified.</li> <li>- Would welcome the introduction of a payment in kind mechanism.</li> <li>- Would welcome the introduction of discretionary relief for low-cost market houses that are to be sold at no more than 80% of their open market value.</li> </ul>			<p>between assisting developers with cash flow issues and the need to draw in funding as soon as possible to enable delivery of infrastructure.</p> <p><u>S106 assumptions</u></p> <p>The partner Councils will provide further information regarding s106 agreements in the Background Papers that will accompany the submission of Draft Charging Schedules.</p> <p>Statements will be prepared regarding the operation of S106 agreements following the adoption of CIL.</p> <p><b>From DDC:</b> DDC’s Infrastructure and Developer Contributions SPD provides that S106 contributions will not be sought for matters on its CIL R123 list. A statement will be prepared regarding the negotiation of S106 agreements following the adoption of CIL.</p> <p><u>The buffer</u></p>

Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>Each partner Council will demonstrate the reasoning for not allocating a buffer in Background Papers that will accompany the submission of Draft Charging Schedules.</p> <p><u>Striking the balance</u></p> <p>It should be noted that the SUEs do provide a considerable amount of the housing supply, even in the first 5 years (the Inspector will likely focus on this) but it must also be considered that strategic infrastructure is required to support growth and the SUEs should be contributing towards this. This will be addressed in further detail by the partner Councils in the Background Papers which will accompany the submission of the Draft Charging Schedules.</p> <p><u>Exceptional relief</u></p> <p><b>From DDC:</b> It is not considered that exceptional circumstances are sufficiently likely to arise in the District to justify the uncertainty and complexity offering</p>

Appendix 3 – Summary of Responses

Respondent	Summary	District	Attending EIP?	Response
				<p>exceptional circumstances relief would entail.</p> <p><b>From NBC &amp; SNC:</b> The Councils are determining the most appropriate approach for their districts.</p> <p><u>Payment in kind</u></p> <p>Payment in kind is an option available to the Partners. It is anticipated that this mechanism will be considered on a site by site basis.</p> <p><u>Discretionary relief</u></p> <p>The partner Councils do not currently intend to offer discretionary relief having regard to the provisions for mandatory relief in respect of social housing.</p> <p>The SUE rate is equivalent to c £3-4,000 per dwelling. This has a minimal effect on the ability or otherwise to deliver affordable housing in line with policy.</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				<p>Affordable Housing Policy – The Submission draft Joint Core Strategy treats the affordable housing as a borough/district wide target and site specific requirements are subject to individual site viability testing.</p> <p>The CIL cannot be said to be holding back delivery on a particular site.</p>
<p>Turleys (on behalf of Prologis)</p>	<ul style="list-style-type: none"> <li>- Support £0m<sup>2</sup> for ‘All other Uses’.</li> <li>- Support an Instalment Policy but GVA should test optimum approach to an Instalment Policy. Propose different Policy (see Table 2.1 in the respondent’s detailed response).</li> <li>- Viability report:               <ul style="list-style-type: none"> <li>- Pays little regard to development cashflow. Ignores Internal Rate of Return.</li> <li>- Indicative allowance of 5-10% costs is insufficient for larger scale commercial development.</li> <li>- Commercial modelling is not available in Appendix 1.</li> <li>- Do not support a token charge of £10m<sup>2</sup> for B1, B2 and B8.</li> <li>- Diversion of contingency to meet CIL liability is wholly inappropriate.</li> <li>- No buffer is proposed, contrary to CIL Guidance.</li> </ul> </li> <li>- References Trafford Council CIL Report.</li> </ul>	<p>DDC, NBC &amp; SNC</p>	<p>Yes</p>	<p><u>Instalment policy</u></p> <p><b>From NBC and SNC:</b> Further consideration will be given to the implications of the suggested Instalment Policies.</p> <p><b>From DDC:</b> The instalment policy is considered to be an appropriate balance between assisting developers with cash flow issues and the need to draw in funding as soon as possible to enable delivery of infrastructure.</p> <p><u>Exceptional relief</u></p> <p><b>From DDC:</b> It is not considered that exceptional circumstances are sufficiently</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
	<p>Would urge Charging Authorities to offer discretionary relief from CIL in exceptional circumstances. DDC approach is not justified.</p>			<p>likely to arise in the District to justify the uncertainty and complexity offering exceptional circumstances relief would entail.</p> <p><b>From NBC &amp; SNC:</b> The Councils are determining the most appropriate approach for their Boroughs/Districts.</p> <p><u>Buffer</u></p> <p>Each partner Council will demonstrate the reasoning for not allocating a buffer in Background Papers that will accompany the submission of Draft Charging Schedules.</p> <p><u>B1, B2 and B8 Charge</u></p> <p>The partners Councils do not propose to introduce a charge of £10m2 for B1, B2 and B8 development at this time.</p>
<p>Watford Parish Council</p>	<p>The CIL levy payments for the rural zones at £150 and £200 are excessive and unjustified and will negate progress of required rural development.</p>	<p>DDC</p>	<p>No</p>	<p>The testing shows that a significant CIL can be afforded, especially for schemes that do not have to provide affordable housing. The Councils have considered the relative</p>

**Appendix 3 – Summary of Responses**

Respondent	Summary	District	Attending EIP?	Response
				balance between raising contributions and an equitable and fair charge for all uses, bearing in mind the ‘State Aid’ issues and the statutory test of striking a balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across the area.
Weedon Bec Parish Council	<ul style="list-style-type: none"> <li>- CIL would be more equitable if applied to all development. Why doesn't it apply to business/employment/industrial development?</li> <li>- Re. 25% for neighbourhood - Where is the forum for us to ensure that our wishes and views are registered and acted on?</li> </ul>	DDC	No	<p>CIL charges have to be set based on evidence of viability, rather than policy objectives. Viability evidence commissioned by the Councils indicates that business/employment/ industrial development cannot support the introduction of a meaningful CIL charge.</p> <p>The parish element is payable to the parish council in question. The amount depends on whether there is an adopted neighbourhood plan in place. The parish council will be able to spend this proportion on whatever it reasonably considers addresses the impact of growth on the parish.</p>
West Haddon Parish Council	The approach to infrastructure funding is a sound approach.	DDC	No	Support noted.



**Appendix 3 – Summary of Responses**

<b>Respondent</b>	<b>Summary</b>	<b>District</b>	<b>Attending EiP?</b>	<b>Response</b>
Yardley Gobion Parish Council	No comment.	SNC	No	Response noted.