

West Northamptonshire Community Infrastructure Levies

Preliminary Draft Charging Schedule Consultations

Statement of Community Engagement and Consultation

June 2014



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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 April and May 2013 the West Northamptonshire Joint Planning Unit managed a consultation on the Preliminary Draft Charging Schedules on behalf of the Partner Councils.

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 Council holds 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 Council has also adopted 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 Council must consult for the PDCS and DCS. The Council has consulted beyond the statutory minimum requirement to ensure that a wider range of consultation bodies were given the opportunity to make representations. These 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 Partner Councils are 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 with planning legislation, regulations and guidance and its purpose is to support the funding of infrastructure

associated with the planned growth set out within the emerging Joint Core Strategy it is appropriate to align public consultation for CIL with adopted SCI. As such the SCI, along with statutory consultation requirements of Regulations 15 and 16 of the CIL Regulations, helped form the basis for who has been consulted on CIL and how CIL will be achieved.

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 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 (as submitted) 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 will now be 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 plans comprise the Development Plan for West Northamptonshire.

1.3.5 The CILs will collect charges from development to facilitate the delivery of 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 Plans.

2.0 Consultations

2.1 The Preliminary Draft Charging Schedules

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 charging schedules for each of the Partner Councils. The Joint Planning Unit managed the consultations on behalf of the three Partner 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 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 15 of the CIL Regulations;
- The consultation bodies specified in each SCI; and
- All those other companies, organisations and individuals in the development sector that the Partner Councils considered may have an interest in CIL.

Every organisation and individual notified about the PDCS consultation over and above the statutory consultees received that notification by either standard letter or email. In total the Joint Planning Unit contacted 1783 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.

2.2.3 The PDCS and relevant evidence was made available for public inspection at the following locations:

i. The Partner Councils' principal offices

A paper copy of the PDCS 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 and of the West Northamptonshire Development Corporation.
 - iii. The West Northamptonshire Joint Planning Unit Website
An electronic copy of the PDCS and relevant evidence is available on the West Northamptonshire Joint Planning Unit website by visiting http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti/WN_CIL_PDCSs_Consultation/consultationHome
 - iv. Local libraries
Paper copies of the PDCS and relevant evidence were held for public inspection on request at 34 libraries in the Borough and in adjoining Council libraries during the consultation period (See Appendix 2 for a list).

2.2.4 In order to assist respondents in the consideration of the consultation, a questionnaire was produced which posed 11 questions. These are discussed further in the following section.

2.3 Results of the Preliminary Draft Charging Schedule Consultations

2.3.1 The Joint Planning Unit received 53 responses to the PDCS consultations that included representations made by developers, Parish Councils, local businesses, local residents, affordable housing providers, infrastructure and utilities companies, public services, environmental groups and supermarkets. The 53 respondents submitted 218 separate comments. Most comments relate to all three of the Partner Councils but the table below lists the individual comments by district.

District	Individual comments
The area of West Northamptonshire	194
The area of Daventry District	9
The area of Northampton Borough	7
The area of South Northamptonshire	8

2.3.2 Those consulted were able to submit their comments electronically or in writing by letter or questionnaire. We received 29 emails, 19 online responses and 5 paper responses. Some of the key issues arising from the consultation are summarised in the tables below.

Question 1

Having considered the evidence base (in terms of the CIL Economic Viability Assessment) do you agree that the proposed CIL rates achieve an appropriate balance between the desirability of funding infrastructure from CIL and the potential effects of the charge on the economic viability of development across the local authority area?

Number of individual comments: 39

Summary of responses:

- Housing market too fragile to sustain the charge.
- Consider s106 assumption is too low for retail schemes.
- Premature to determine rates until JCS adopted.
- Affordable housing policy is excessive.
- Rates should illustrate a buffer.
- Sales values are too high.
- Fixed assumptions, and therefore the interpretation of results, inaccurate.
- The balance between viability and delivery of infrastructure is not achieved.
- Insufficient evidence to support charges.

Question 2

Do you agree that the West Northamptonshire Infrastructure Delivery Plan (July 2012) demonstrates a funding gap that provides sufficient justification for the introduction of CIL within each of the local authority areas?

Number of individual comments: 28

Summary of responses:

- Concern that CIL + s106 is an unreasonable double levy for retail.
- Information is not sufficient or robust.
- Money should be spent on community amenities, schools, healthcare and roads.
- Require further information on Objectively Assessed Housing Need.
- Accurate costs for infrastructure projects are not available.
- Adoption of CIL to bridge funding gap is welcomed.

Question 3

Do you agree with the Proposed Residential Charging Rates: Urban Zone (Including Strategic Urban Extensions (SUEs) - £50 per sqm?

Number of individual comments: 18

Summary of responses:

- Insufficient evidence provided.
- Charges should be £150m² for all developments, rural and SUE.
- Rates for South Northants should be higher.
- Retail rates will make development unviable.
- Fixed rate for SUEs allows for certain sites to contribute more through s106.

Question 4

Do you agree with the Proposed Residential Charging Rates: Rural Zone - £150 per sqm?

Number of individual comments: 19

Summary of responses:

- Rate is too high.

- Rate totally unviable. See Rugby rate of £50m² in rural areas.
- Not enough information provided.
- Assumes all areas are homogenous.
- Lower rates would provide flexibility and a more sustainable district.
- Rural sites could have higher costs.
- Viability testing demonstrates that charge is unviable.
- £100m² would be more appropriate.
- Approach to benchmark land values is unrealistic.

Question 5

Do you agree with the Proposed Retail Charging Rates - £100 per sqm (excluding central zones in Daventry and Northampton)?

Number of individual comments: 12

Summary of responses:

- Rates are too high. Will make some development unviable.
- S106 and s278 contributions under estimated.
- Setting CIL levels at the maximum will not ensure viability.
- Marginal rural retail like farm shops would be compromised.
- More information required.
- Consider it is a reasonable charge.

Question 6

Do you agree with the proposed charging zones (see Section 7 of the Preliminary Draft Charging Schedule documents)?

Number of individual comments: 16

Summary of responses:

- Zones are very specific. The levy should be uniform across the County.
- Areas are not homogenous.
- Case studies on a district basis required.
- Approach is overly simplistic.
- Challenge legality of approach.
- SUEs should be charged the same as the rural rate.
- Agree with approach. Not overly complex and treats all parishes equally.

Question 7

Do you agree that the CIL Economic Viability Assessment has assessed the overall economic viability of the development types most likely to occur in West Northamptonshire in the foreseeable future? If not, what other development types should be tested and what is your justification for this?

Number of individual comments: 16

Summary of responses:

- Has not tested lower densities. Most Daventry developments are below 30dph.
- Abnormal costs not taken into account.
- Assessment is too broad.
- Infrastructure for DDC is in need of review.
- Agriculture and rural workers' dwellings should be exempt.
- All major land uses assessed.
- Rates do not achieve an appropriate balance.

Question 8

Do you consider the charging authorities should adopt a scheme of discretionary relief, so that in exceptional circumstances of economic viability developments that meet the essential criteria can be exempted from paying CIL?

Number of individual comments: 14

Summary of responses:

- Decision is welcomed.
- Would provide flexibility.
- Important to strike a balance to ensure relief given as appropriate but not at the expense of providing infrastructure.
- Everyone will apply for relief which will cost the courts a great deal.
- Relief should not be offered to SUEs.
- Relief should be rare, can be removed if necessary.

Question 9

Do you consider that the charging authorities should have a policy for paying the chargeable amounts in instalments? If so, do you have a preference for how such a policy should be set, for example by percentages of the total amount and the length of time period in days?

Number of individual comments: 16

Summary of responses:

- Phasing and an instalment policy would work well.
- Recommend quarterly instalments by equal %.
- Recommend 33% at receipt of liability, 33% at start, 34% at completion.
- Instalment will result in delays to provision of infrastructure.
- Instalments should reflect type of development, for example size, location, timescale for delivery.

Question 10

Infrastructure projects required to support new development, especially those identified in the West Northamptonshire Infrastructure Delivery Plan, may be candidates for receiving any CIL obtained. This first stage of consultation will help inform the projects that may be prioritised for funding through CIL. Suitable projects may be identified on the Councils' Regulation 123 List (the list of infrastructure projects and/or infrastructure types that CIL monies will be spent on).

What do you consider should be included within the Councils Regulation 123 list?

Number of individual comments: 22

Summary of responses:

- Should consider neighbouring local authority and parish areas.
- Transport, health, utilities, community facilities, green infrastructure and education were key priorities for respondents generally.
- Work on CIL should be postponed until JCS has progressed further.

Question 11

Do you have a view on how the District/Borough Councils should coordinate and work with other infrastructure providers to ensure the delivery of infrastructure projects funded by CIL?

Number of individual comments: 18

Summary of responses:

- CIL should strike a balance.
- Partner Councils should set up a working group.
- Governance arrangements are unclear.
- Infrastructure providers should have an opportunity to work collaboratively.
- Work on CIL should be postponed until JCS has progressed further.

2.3.3 The responses to the PDCS consultations have been published on the West Northamptonshire Joint Planning Unit website to inform the Draft Charging Schedule (DCS) consultations. 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_PDCSs_Consultation/listRespondents

2.3.4 The table in Appendix 3 also summarises the response of the Partner Councils and each resulting 'Action'.

3.0 Stakeholder Engagement

- 3.1 Prior to embarking upon the preparation of the Preliminary Draft Charing 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.

Appendix 1 – List of consultation bodies

The consultation was sent directly to all organisations and individuals on our database, including:

Town and Parish Councils:

Abthorpe Parish Council
Adderbury Parish Council
Adstone Parish Meeting
Alderton Parish Meeting
Arthingworth Parish Council
Ashby St Ledgers Parish Council
Ashton Parish Council
Aston le Walls Parish Council
Aynho Parish Council
Badby Parish Council
Banbury Town Council
Barby and Onley Parish Council
Beachampton Parish Council
Biddlesden Parish Council
Billing Parish Council
Blakesley Parish Council
Blisworth Parish Council
Boddington Parish Council
Bodicote Parish Council
Boughton Parish Council
Brackley Town Council
Bradden Parish Meeting
Brafield on the Green Parish Council
Braunston Parish Council
Broughton Parish Council
Brixworth Parish Council
Brockhall Parish Council
Broughton Parish Council
Bugbrooke Parish Council
Byfield Parish Council
Calverton Parish Council
Canons Ashby Parish Council
Castle Ashby Parish Council
Castlethorpe Parish Council
Catesby Parish Council
Chacombe Parish Council
Charwelton Parish Council
Chipping Warden Parish Council
Church & Chapel Brampton Parish Council
Church with Chapel Brampton Parish Council
Clay Coton Parish Council
Claydon with Clattercott PC
Clifton Hampden Parish Council
Clifton Upon Dunsmore Parish Council
Clipston Parish Council

Cogenhoe and Whiston Parish Council
Cold Ashby Parish Council
Cold Higham Parish Council
Collingtree Parish Council
Cosgrove Parish Council
Cottesbrooke Parish Council
Cottisford Parish Meeting
Courteenhall Parish Meeting
Creaton Parish Council
Crick Parish Council
Croughton Parish Council
Culworth Parish Council
Daventry Parish Council
Daventry Town Council
Deanshanger Parish Council
Deddington Parish Council
Denton Parish Council
Dodford Parish Council
Draughton with Maidwell Parish Council
Dunchurch Parish Council
Duston Parish Council
Earls Barton Parish Council
East Farndon Parish Council
East Haddon Parish Council
Easton Neston Parish Meeting
Ecton Parish Council
Edgcote Parish Meeting
Elkington Parish Council
Evenley Parish Council
Everdon Parish Council
Eydon Parish Council
Farthinghoe Parish Council
Fathingstone Parish Council
Fawsley Parish Council
Flore Parish Council
Flore, Byfield and Long Buckby Parish Council
Gayton Parish Council
Grafton Regis Parish Meeting
Grange Park Parish Council
Great Houghton Parish Council
Great Oxendon Parish Council
Greatworth Parish Council
Greens Norton Parish Council
Grendon Parish Council
Guilsborough Parish Council
Hackleton Parish Council
Hannington Parish Council
Hanslope Parish Council
Hardingstone Parish Council
Hardwick & Tusmore Parish Meeting
Harlestone Parish Council
Harpole Parish Council
Harrington Parish Council
Hartwell Parish Council
Haselbech Parish Council
Hellidon Parish Council

Helmdon Parish Council
Heselbech Parish Council
Holcot Parish Council
Holdenby Parish Council
Hollowell Parish Council
Kelmarsh Parish Council
Kilsby Parish Council
Kings Sutton Parish Council
Kislingbury Parish Council
Lampport Parish Council
Leckhampstead Parish Council

Lilbourne Parish Council
Lillingstone Dayrell with Luffield Abbey
Parish Councils
Lillingstone Lovell Parish Council
Litchborough Parish Council
Little Houghton Parish Council
Loddington Parish Council
Long Buckby Parish Council
Maidford Parish Council
Maidwell Parish Council
Marston St Lawrence Parish Council
Marston Trussell Parish Meeting
Mid Northamptonshire Parishes 2001
Middleton Cheney Parish Council
Milton Malsor Parish Council
Mixbury Parish Meeting
Moreton Pinkney Parish Council
Moulton Parish Council
Naseby Parish Council
Nether Heyford Parish Council
Newbottle Parish Council
Newnham Parish Council
Norton Parish Council
Old Parish Council
Old Stratford Parish Council
Olney Town Council
Orton Parish Council
Overstone Parish Council
Overthorpe Parish Council
Pattishall Parish Council
Paulerspury Parish Council
Pitsford Parish Council
Potterspury Parish Council
Prestcote Parish Meeting
Preston Capes Parish Council
Priors Hardwick Parish Council
Priors Marston Parish Council
Quinton Parish Council
Radstone Parish Meeting
Ravensthorpe Parish Council
Ravenstone Parish Council
Roade Parish Council
Rothersthorpe Parish Council
Scaldwell Parish Council
Shutlanger Parish Council
Sibbertoft Parish Council

Silverstone Parish Council
Slapton Parish Meeting
Souldern Parish Council
Spratton Parish Council
Stanford Parish Council
Staverton Parish Council
Stoke Bruerne Parish Council
Stoke Goldington Parish Council
Stoke Lyne Parish Council
Stoneton Parish Meeting
Stony Stratford Town Council
Stowe Nine Churches Parish Council
Sulby Parish Council
Sulgrave Parish Council
Syresham Parish Council
Sywell Parish Council
Thenford Parish Meeting
Thornby Parish Council
Thornton Parish Council
Thorpe Mandeville Parish Council
Tiffield Parish Council
Towcester Town Council
Turweston Parish Council
Upper Heyford Parish Meeting
Upton Parish Council
Walgrave Parish Council
Wappenham Parish Council
Wardington PC
Wardington PC
Warkworth Parish Meeting
Warkworth Parish Meeting
Warrington Parish Council
Watford Parish Council
Weedon Bec Parish Council
Weedon Parish Council
Welford Parish Council
Welton Parish Council
West Haddon Parish Council
Weston and Weedon Parish Council
Weston Underwood Parish Council
Whilton Parish Council
Whitfield Parish Meeting
Whittlebury Parish Council
Wicken Parish Council
Willoughby Parish Council
Winwick Parish Council
Wolverton Town Council
Woodend Parish Meeting
Woodford cum Membris Parish Council
Wootton Parish Council
Wormleighton Parish Meeting
Yardley Gobion Parish Council
Yardley Hastings Parish Council
Yelvertoft Parish Council

Residents Associations:

Banbury Lane Residents Association

Blackthorn Residents Association
 Boothville Community Council
 Borough Hill Residents Association
 Briar Hill 2 Residents Association
 Briar Hill Residents Association
 Brookside Residents Association
 Camp Hill Residents Association
 Castle St James Residents Association
 Castles Residents Association
 Collingtree Park Residents Association
 Colwyn Road Residents Association
 Community & Residents Association of Southfields
 Drayton Residents Association
 Eastfield Residents Association
 Evenley Residents Association
 Far Cotton Residents Association
 Friars Residents Association
 Green Park Residents Association
 Hood Street Residents Association
 Hopping Hill Residents Association
 Hunsbury Residents Association
 Kings Heath Residents Association
 Kingsthorpe Hollow Residents Association
 Lake View Residents Association
 Lawrence & Deal Court, Deal, Leicester & Duke Street Residents Association
 Northampton Federation of Residents' Associations
 Overstone Lodge & Goldings Residents Association
 PEMBA Residents Association
 Phippsville Residents Association
 Queens Crescent Residents Association
 Queens Park Residents Association
 Rectory Farm Residents Association
 SPCC Residents' Association
 Spencer Dallington Residents Association
 Spring Boroughs Residents Association
 St David's Residents Association
 Standens Barn Residents Association
 Tanfield Residents Association
 Thorpeville Residents Association
 Thorplands Residents Council
 Thrift Streets & Vernon Terrace Residents' Association
 Tunnells Residents Association
 Whitehills & Spring Prk Residents Association
 Wilby St, East St & South Tce Residents Association
 Wood Burcote Residents Association

Area Partnerships:

Northampton Area Partnership 3
 Northampton Area Partnership 4
 Northampton Area Partnership 5
 Northampton Area Partnership 6

Northampton Area Partnership 7
 Northampton Area Partnership 8
 Northampton East Area Partnership

Community Groups and other Organisations:

Ability Northants
 ACERT
 African Caribbean Elders Society
 Age Concern
 Ashby St Ledgers Conservation Group
 Asian Men Sports & Social Club
 B.R.D Conservation Group
 Barrack Road CAAC
 Berkeley Community Villages
 Blisworth Historic Buildings Society Trust
 Blisworth Heritage Society
 Brackley Amenity Society
 Brackley Cottage Hospital
 Brackley Fox Lane Trust
 Brackley Means Business
 Brackley Mencap
 Brackley Residents Action Group
 Brackley Vision
 British Geological Survey
 British Horse Society
 Brixworth Residents Against Unnecessary Development
 Brockwatch
 Buckingham Canal Society
 Bugbrooke History Society
 CABA
 CALA (Campaign against Lorry Abuse)
 CAMRA
 CAN
 Carers Forum Northamptonshire
 Church Commissioners
 Church of England
 Churches Together in all Northamptonshire
 Cinema Theatre Association
 Citizen's Advice Bureau
 Civic Trust
 Civil Aviation Authority
 Collingtree CAAC
 Commission for Racial Equality
 Connexions
 Conservation Officer Group & Partners
 Council for British Archaeology
 Council for Ethnic Minorities Communities (Northampton)
 Council for Voluntary Services (Northampton)
 Countryside Agency
 CPRE Northamptonshire
 Crossroad Care
 Cut Waste Improve Competitiveness
 CWICK

Cyclists Touring Club
 DACT
 Dallington CAAC
 Dallington Sheltered Housing Residents Association
 Daventry Allotment Association
 Daventry and District Civic Society
 Daventry and South Northants MAGRAH
 Daventry Villages Together
 Daventry Volunteer Centre
 Daventry Women's Institute
 Deafconnect
 Deanshanger Heritage Society
 Department for Business, Enterprise and Regulatory Reform
 Department for Children, Schools and Families
 Department for Constitutional Affairs
 Department for Culture, Media and Sport
 Department for Innovation, Universities and Skills
 Department for Transport Rail Group
 Department for Work and Pensions
 Department of Communities and Local Government
 Department of Transport
 DIAL
 Dialogue
 Diocesan Board of Finance
 Disability Rights Commission
 Disabled Persons Transport Advisory Committee
 District Development Consultancy
 Domestic Violence Forum
 Duston Local History Society
 East Midlands Arts Board
 East Midlands Churches Forum
 East Midlands Development Agency
 East Midlands Planning Aid Service
 East Midlands Regional Assembly
 East Midlands Regional Housing Board
 East Midlands Sports
 Ekins Allotment Association
 EMDA
 Emmanuel Church Weston Favell Centre
 English as 2nd Language Group
 English Heritage
 English Historic Towns Forum
 English Partnerships
 Enterprise Solutions
 Environment Agency
 EPCAD
 Equal Opportunities Commission
 Explore Northamptonshire
 Fable Gospel Hall Trust
 Forest Enterprise
 Forestry Commission
 Forestry Commission, East Midlands

Conservancy
 Freight Transport Association
 Friends of Alderton Monuments
 Friends of Boughton Area
 Friends of Bradlaugh Fields
 Friends of the Earth
 Friends of the Earth (East Midlands)
 Friends of the Earth (London)
 Friends of the Racecourse
 Government Office for the East Midlands
 Grandfield Partnership
 Great Houghton CAAC
 Gypsy and Traveller Law Reform Coalition
 Health & Safety Executive
 Heart of England Tourist Board
 Help the Aged
 Highways Agency
 Hinton in the Hedges Parish Meeting
 HM Prison Service
 Hobden Partnership
 Home Builders Federation
 Home Housing Association
 Home Office
 Home Start
 Home Start Northampton
 House Builders Federation
 Housing Corporation
 Inclusion & Pupil Support
 Inclusive Environment Group
 Indian Hindu Welfare Organisation (IHWO)
 Inland Waterways Association
 Inland Waterways Association - Northampton Branch
 In-Motion Travel
 Innes England
 Institute of Directors (London)
 Invest Northamptonshire
 Jehovah's Witnesses
 Kettering Community Architects
 Kettering Rd, East Park Parade Residents & Community Association
 Kingsley CAAC
 Kingsley Park Methodist Church
 Kingsoak
 Kingsthorpe CAAC
 Kingsthorpe Grove Allotments Association
 Landmark Information Group
 Landscape
 Learning & Skills Council
 Legal Services Commission
 Lifelong Learning
 Long Buckby Rail Users' Group
 MAGRAH
 Midlands Rural Housing
 Milton Malsor Action Group
 Milton Malsor Historical Society
 MIND
 Moulton Environment Group

National Association of Local Councils
National Consultancy Unit, English Partnerships
National Council for the Conservation of Plants and Gardens
National Council of Women
National Farmers Union
National Federation of Bus Users
National Playing Fields Association
National Probation Service
National Society of Allotments & Leisure Gardeners Ltd
National Trust
Natural England
Ncompass
Nene Flood Prevention Alliance
Nene Housing Society
New Testament Church of God
NFBU
Northampton & Lamport Railway
Northampton Auctions PLC
Northampton Borough Allotment and Garden Council
Northampton Central Area Partnership
Northampton Chamber of Trade
Northampton College
Northampton Commissioning PCG
Northampton Connolly
Northampton Diesel & Electrical Services
Northampton Disabled People Forum
Northampton Door to Door Service (NDDS)
Northampton Friends of the Earth
Northampton General Hospital NHS Trust
Northampton Lesbian, Gay and Bisexual People Forum
Northampton Pensioners Forum
Northampton Race Equality Forum
Northampton Rail Users Group
Northampton Rapid Transit System Limited
Northampton Taxi Cab Association
Northampton Transport Users Forum
Northampton Volunteering Centre
Northampton Women Forum
Northampton Women's Aid
Northampton Youth Forum
Northamptonshire ACRE
Northamptonshire Adult Learning Service
Northamptonshire Archeological Society
Northamptonshire Association of Local Councils
Northamptonshire Chamber
Northamptonshire Community Foundation
Northamptonshire Co-operative Development Agency
Northamptonshire County Council Fire and Rescue Service
Northamptonshire Enterprise Ltd
Northamptonshire Environmental Forum

Northamptonshire Environmental Network
Northamptonshire Federation of the Women's Institute
Northamptonshire Lesbian and Gay Alliance
Northamptonshire Race Equality Council
Northamptonshire Racial Equality Council
Northamptonshire Rural Housing Association
Northamptonshire Sport
Northamptonshire Voluntary and Community Sector Alliance
Northants Wildlife Trust
Nortoft Partnerships Ltd
Norton Village Design Statement Steering Group
Nottingham Community Housing Association
NSV
NTACT
Office of Government Commerce
Old Road Securities Plc
Oxfordshire Archaeological Unit
Parklands Allotments Association
Peterborough Diocesan Board of Finance
Peterborough Diocese
Pleydell Road Allotment Committee
Post Office Property Holdings
Princes Foundation
Rail Freight Group
Rail Users Group
Railfuture
Ramblers' Association
RIBA
Ridge
River Nene Regional Park
RMC Group Services Ltd
RNRP
Road Haulage Association
Rotary Club
Royal Commission on Historic Monuments
RSPB
Seeda Headquarters
Semilong Community Forum
Showmans Guild of Great Britain
Silverstone Pre-School Group
SOS Campaign
South East England Development Agency
South Northamptonshire Independent Parishes
South Northamptonshire Tenants Group
South Northamptonshire Volunteer Bureau
South Northamptonshire Youth Council
South Warwickshire Housing Association
Southbrook Junior School
Sport England
Sport England (East Midlands)
St Georges Community & Wildlife Group

St Lawrence C of E Church
 Stony Stratford Association
 STOP Northants
 Sustainable Transport
 Sustrans East Midlands
 Sworders
 The Churches' Officer for New
 Communities
 The Coal Authority
 The Community Mental Health Team
 The Federation of Master Builders
 The Football League
 The Garden History Society
 The Georgian Group
 The Grange
 The Gypsy Council
 The House Builders Federation
 The Landscape Partnership
 The Littman Partnership
 The Naseby Battlefield Project
 The National Trust
 The Northamptonshire Residents Alliance
 The Police Authority
 The Studio
 The Theatres Trust
 The Victorian Society
 The Wantage Gospel Trust
 The Wildlife Trust
 The Woodland Trust
 The Youth Offending Team
 Thorburn Colquhoun
 Time 2 Talk
 TORCH
 TORCH Northamptonshire
 Total Reclaims Demolition Ltd
 Tove Valley Baptist Fellowship
 Towcester & District Local History Spociety
 Towcester and District Local History
 Society
 Towcester Business Club
 Towcester Partnership
 Town Centre CAAC
 Transport Users Group
 Traveller Law Reform Coalition
 Twentieth Century Society
 United Reformed Church
 Victim Support
 Weedon History Society
 Welfare Rights Advisory Service
 Welford Action Group
 Women's Aid
 Women's National Commission
 WWF
 YMCA
 Youth Offending Team
 Zindgani (Aston Main Group)

Service Providers:

Adolescent Services
 Advantage West Midlands
 Ancient Monuments Society
 Ancient Tree Forum
 Anglian Water
 Arts Council England, East Midlands
 Boughton Primary School
 British Chemical Distributors & Traders
 Association
 British Ecological Society
 British Gas PLC
 British Gas PLC (South)
 British Railways Board
 British Shops and Stores Association
 British Telecom
 British Waterways
 British Waterways South East
 British Wind Energy Association
 Buckingham and River Ouzel Internal
 Drainage Board
 Cable & Wireless UK
 Champion School
 Caroline Chisholm Scool
 Central Networks
 Central Railways
 Chenderit School
 Children and Families
 Community Access and Language
 Service
 Community Mental Health Team
 Community Windpower Ltd
 Connells Land and Planning
 Conrad Ritblat Erdman
 Cooper Partnership
 Corus Property Department
 Country Properties
 Countryside Properties (Special
 Projects) Ltd
 Crest Homes
 Crest Nicholson Developments Ltd
 Croudace
 Crown Estate Commissioners
 Daventry District Council
 Daventry and South Northants PCT
 Daventry Fire Service
 Daventry Job Centre
 Daventry Police
 Daventry Tertiary College
 East Midlands Ambulance Service
 East Midlands Electricity
 Entec UK Ltd
 EWS Ltd
 Fire Service
 First Bus – Northampton
 Gridcom UK
 Hutchinson 3G UK Limited
 Kingsbrook School

Magdalen School
 Mereway Ambulance Station
 Milton Keynes PCT
 MK Metro
 Mobile Operators Association
 Moulton College
 Moulton Surgery
 National Grid
 Network Rail
 NHS Confederation
 NHS East Midlands
 NHS Estates
 NHS Executive (Anglia & Oxford)
 NHS Executive South East Region
 North Oxfordshire PCT
 Northampton Borough Council
 Northamptonshire County Council
 Northamptonshire Fire & Rescue Service
 Northamptonshire Healthcare NHS Trust
 Northamptonshire Police
 Northamptonshire Police - Western Area
 Northamptonshire Probation Area
 Northamptonshire Teaching Primary
 Care Trust
 NPower (Renewables)
 NTL Group Limited
 O2 (UK) Limited
 Orange Personal Communications Ltd
 Powergen
 Quinton House School
 Roade School
 Silverlink Train Services
 South Midlands LIFT Project Team
 Sponne School
 St Andrews Hospital
 St. Loys Church of England Primary
 School
 Stagecoach East
 Sywell Aerodrome
 Thames Water Property
 T-Mobile (UK) Limited
 Transco
 University of Northampton
 Virgin Trains
 Vodafone Group PLC
 Yorks Coaches
 Yorks Travel

**Businesses, Developers, Agents and
Landowners:**

Abbey Developments Ltd
 Abbey Ross
 Abbeyfield UK HA
 Abbot Anstey Reader
 AC Adam Development Ltd
 Adams Holmes Associates

Advance Housing Association
 AIG Property
 Andrew Granger & Co
 Andrew Martin Associates
 Anthony Ricketts
 Aracon UK
 Aragon
 Arnold Thompson
 Arun Investments
 Ashby St Ledgers Farms LTD
 Atis Real Weatheralls
 Atkins (Property Service, NCC)
 AWG Property Limited
 Barratt (Northampton)
 Barris Liptrott
 Barry Howard Homes Ltd
 Barton Willmore
 Barwood Land
 Bayly and Co
 Beacon Housing Association
 Bedfordshire Pilgrims Housing Association
 Bellinge Residents Association
 Bellway Homes
 Ben Coleman Associates
 Berkeley Homes (North London) LTD
 Bernard and Mary Sunley Ltd
 Berry Morris
 Bidwells
 Bidwells Drake
 Bletsoe & Son
 Bloor Homes
 Blue Boar Group Holdings
 Boots Properties PLC
 Boots the Chemists Ltd
 Bovis Homes Ltd
 Boyer Planning
 BPA Ltd
 Bpha (Bedfordshire Pilgrims Housing
 Association)
 Brafield Stadium- Brafield Motorsports
 Branston and Company
 BRB (Residuary) Ltd
 Brian Barber Associates Ltd
 Brian Cornley
 Briton Properties Ltd
 Bromford Housing Group
 Brown & Co
 BT PP426 Derngate ATE
 BTCV
 Buchanan Consulting Engineers
 Budworth Hardcasstle
 Burbage Realty
 Burnett Planning and Developmet
 Business Link Northamptonshire
 Butler Sherborn
 Calvoyden Property Ltd
 Camargue Consultants
 Cannons Group Limited

Carillion URS
Carlsberg Tetley
Carpenter Planning
Carter Jonas
Cavendish Properties
CB Richard Ellis Ltd
CBI (East Midlands)
CDS Development Services
Celeford Essex Associates
Centex Strategic Land
CGMS
Chadwick McRae Chartered Surveyors
Chancellors
Chapman Warren
Charles Church Developments
Charles F Jones
Charles Planning Associates
Chesterhouse
Chesterton Plc
Chetwood Associates
Chiltern Hundreds Housing Association
Chris Thomas Ltd
Christ Church Oxford
Christina Cherry
CJC Development
Clayson Country Homes
Clayson Haselwood
Cleford Essex
Cluttons
Colliers CRE
Cushman & Wakefield
Cushman and Wakefield Healy and Baker
D M Wood Will Trust
Dalton Warner Davis
Dandara Holdings
Danetree Consortium
Darland Property Management Ltd
Daventry Business Breakfast Club
David L Walker
David Lock Associates
David Wilson Estates
Dbi Consulting
De Pol Associates
Defence Estates East
Dennis Faulkner & Alsop
Derek Lovejoy Partnership
Development Land & Planning
Devplan UK
Diamond Estates
Dignity Funerals Ltd
DLA LLP
Dolton Warner Davies
Donaldsons LLP
DPDS Consulting Group
DRH Architectural Design
Drivers Jonas
DTZ

DTZ Piedad Consulting
East Midlands Housing Association
Easynet Group
English Churches Housing Group
English Courtyard Developments Ltd
First City
Firstplan
Fisher German
Fox, Bennett & Hackney
FPD Savills
Frampton
Frazer Kircaldy
Freeman Leisure
Freeth Cartwright LLP
Frontier Estates
Fuller Pieser
G A Soame & Associates
G L Hearn Planning
G R Kenning
Gallagher Estates
Gardner Associates
Gazeley Properties Ltd
Genesis Holdings
Geoff Amos Coaches
George Wimpey South Midlands Ltd
George Wimpey UK Ltd
George Wimpey West Midlands Ltd
Gerald Eve
Gill Pawson Planning
Godfrey Payton
Goldfinch
Goode Coaches
Gotch, Saunders and Surridge
Goth
Gough Planning Services
Gregory Gray Associates
GVA Grimley
Hadland Chartered Surveyors
Halkins and Haskins
Hallam Land Management Ltd
Hardys and Hansons
Harris Lamb Planning Consultancy
Hartwell Bond
Harwoods
Hawksmoor Property Services
Haywood and White
Head Mann Associates
Healey & Baker
Henry H. Bletsoe & Sons
Hepher Dixon
Hewitsons
Highgrade Motors
Hinton In The Hedges Airfield
Holme Holdings
Holmes Antill
Howard Sharp and Partners LLP
IG Land and Planning

Indigo Planning Ltd
J & J Design
J A Pye
J B Planning Associates
J B Planning Associates Ltd (for Kier Land Ltd)
J S Bloor Services
James Bailey Planning
James Martin and Co.
Januarys
Jennifer Lampert Associates
John Drake & Co
John Heber Evans Chartered Designers
John Martin & Associates
John Phillips Planning
Jones Day
JS Bloor Homes
Kember Loudon Williams Ltd
Kemp & Kemp
Kensington Homes
Kier Land Ltd
King Sturge
King West
King West Blacklee Smith
Kirkby and Diamond
Lafarge Aggregates
Laing Homes
Lambert Smith Hampton
Lane Fox Residential Ltd
LDA Design
Legal & General
Leicester Housing Association
Leith Planning
LEVVEL Consulting Ltd
LHA Housing Association
Lidl UK
Linfield Ltd & Lintec Systems Ltd
Lloyd Thomas Architects
Loveday & Davis
Lovejoy
Lovejoy Partnership
Lovell Johns
Lucas Land and Planning Consultants Ltd
Malcolm Judd & Partners
Malcolm Scott Consultants Ltd
Mansford Holdings Plc
Marchfield Developments
Marriott Hardcastle
Marrons
Marston St Lawrence Estate
Marston's Plc
Martin Grant Homes (UK) Ltd
Martin Pendered
Marwalk
Mason Richards Planning
McCann Homes
McCarthy and Stone
McGowan Investments

McIntyres
MCL Property Consultants
Meccantice Land
Merrys
Midsummer Housing Association
Mike Hardy Planning Consultant
Miller Homes
Minster General Housing Association
Molyneux Planning
Montague Evans
Montagu-Evans
Morrison Supermarkets PLC
Mott McDonald
MSP
NAI Fuller Peiser
Nathaniel Lichfield and Partners
Nicholas Tye
Northampton Landlords' Association
Number One
Oldfield King Planning
Orbit Housing Association
O'Riordan Bond
Osborne & Shellard
Paradigm Housing Group
Paul & Company
Peacock and Smith
Pegasus Planning Group
Persimmon Homes
Persimmon Homes (Midlands) Ltd
Peter Brett Associates
Peter Haddon & Partners
Phillips Planning Services Ltd
Plainwood Holdings
Planning Bureau
Planning Issues
Planning Potential
Plant Hire Contractors
R Stafford Charles & Son
Rapleys
Rapleys LLP
Redline Town and Planning Development Consultants
Redrow Homes (Midlands) Ltd
Robco-Reed Ltd
Robert Doughty Consultancy
Robert Hitchins Ltd
Robert Turley Associates
Robinson & Hall
Rockingham Forest Housing Association
Roger Coy
Roger Mason Planning
Roger Tym and Partners
Royal Mail
Royal Mail Group
Royal Mail Group c/o Atisreal
Royal Mail Operations West Territory
Royal Mail Property Holdings
RPS

Rudding Estate Office
Rugby Cement
Samuel Rose Ltd
Savills
Second Site Property
Servite Houses
Shaftsbury Society
Shoosmiths
Shortland King
Slough Estates
Smith Stuart Reynolds
Smith Woolley
Smiths Gore
Stamford Homes Ltd
Stansgate Planning Consultants
Star Planning & Development
Steer Ethelston
Stepnell Estates Limited
Strangford Property Consultancy Ltd
Strategic Land Partnerships
Strutt & Parker
Stuart Michael Associates Ltd
Stuart Ross Associate
Taylor New Homes
Taylor Williams Properties
Taylor Woodrow Developments Ltd
Taywood Homes Ltd
Tenscentral Ltd
Terence O'Rourke
Tesco Stores Ltd
Tetlow King Planning
Tew and Smith
TFM Readers
The Bell Cornwell Partnership
The Planning Bureau Ltd
The Planning Inspectorate
Topaz Developments Ltd
Towcester Veterinary Surgery
Town Planning Consultancy
TPK Consulting
Trevor Jolley Design
Turley Associates
Turweston Flight Centre Ltd
Twigden Homes
Twigg & Associates Ltd
Underwoods
Vartec Telecom Europe
Verres De Vin Wines Company
Video Inn Production
WA Fairhurst and Partners
Walker Morris
Warmingtons
Watermead Homes Ltd
Westbury Homes (Holdings) Ltd
Westleigh Developments Ltd
Weston Favell Shopping Centre
White Mitchell Chartered Surveyors

White Young Green Planning
Whites Estates Agents
Wilbraham Associates Ltd
Wilcon Homes Midlands Ltd
William Davies Ltd
Willow Inns Limited
Wilson Bowden Properties
Wilson Connolly (Home Counties)
Wimpey Homes
Wimpey Homes (East Midlands)
Wm Morrison Supermarket Plc
Woods Hardwick Planning Limited
Woolf Bond Planning
WSP Group Ltd

Adjoining Councils:

Aylesbury Vale District Council
Buckinghamshire County Council
Borough Council of Wellingborough
Cherwell District Council
Corby Borough Council
East Northamptonshire Council
Harborough District Council
Kettering Borough Council
Leicestershire County Council
Milton Keynes Council
North Northamptonshire Joint Planning Unit
Oxfordshire County Council
Rugby Borough Council
Stratford upon Avon District Council
Warwickshire County Council

Appendix 2 – List of public inspection locations

Council/ Development Corporation Offices

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

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_PDCSs_Consultation/listRespondents

Respondent	Comment	Partner Council Response	Action
Question 1			
Having considered the evidence base (in terms of the CIL Economic Viability Assessment) do you agree that the proposed CIL rates achieve an appropriate balance between the desirability of funding infrastructure from CIL and the potential effects of the charge on the economic viability of development across the local authority area?			
Anglian Water	Funding of water and wastewater unlikely to form part of CIL provisions.	Response noted.	n/a
Arthingworth Parish Council	<ul style="list-style-type: none"> Do not agree. Will have detrimental effect on those wishing to get onto the property ladder. Housing market too fragile to sustain charge. 	The proposed CIL charges will partially replace existing charges already negotiated via s106 agreements.	n/a
Asda Stores Ltd	<ul style="list-style-type: none"> Propose flat rate across all development across its boundaries. Provide draft instalment policy. No evidence presented of s106 contributions. Underestimate s106 and s278 contributions from retail schemes. 	Viability evidence illustrates that not all use classes are able to sustain a CIL charge. The Partner Councils are required to introduce charges which would not put delivery of the Joint Core Strategy as a whole at risk.	n/a
Aynho Parish Council	Proposed CIL rates will achieve a viable balance to achieve investment in the necessary infrastructure to support the development target as stated and that those proposed rates will not be detrimental to the economic viability of the planned development across the local authority area.	Response noted. All development has some impact on the need for infrastructure, services and amenities or benefits from them so it is fair that such development pays a share of the cost. CIL is the government's preferred method of seeking contributions to all but directly site related infrastructure and will largely replace the need for S106 agreement	n/a

Respondent	Comment	Partner Council Response	Action
		<p>contributions.</p> <p>The viability evidence demonstrates that the proposed rates support the delivery of the Joint Core Strategy without undermining the overall economic viability of delivery across its area.</p>	
Barwood Land & Estate Ltd	Without a firm housing number to consider the CIL against in terms of delivering the necessary infrastructure for the area, we consider that it would be premature to comment on the proposed rates at this time.	Response noted.	n/a
Boughton Parish Council	The Parish Council is extremely concerned that the majority share of the CIL will go to the charging authorities and be retained for expenditure in other parts of the County/Borough/District.	CIL is collected by the Charging Authority and annual monitoring of receipts and spend will illustrate how funds are being directed. The R123 List (a list of projects that will benefit from CIL funds) will form part of the Draft Charging Schedule consultation and stakeholders will have an opportunity to comment at that stage. It is also noted that the CIL Regulations provide for 15 to 25% of the levy arising from developments within parish council areas to be passed directly to those parish councils. In parishes with a neighbourhood plan in place, the	Draft R123 List prepared for next consultation.

Respondent	Comment	Partner Council Response	Action
		proportion will be 25% uncapped. In parishes without a neighbourhood plan the proportion will be 15% and capped at £100 per dwelling in the parish per year. In unparished areas the council will be able to use the proportion for local priorities in consultation with local residents.	
Brixworth Parish Council	Affordable housing of 40% in rural areas is excessive.	Viability evidence for Affordable Housing has been completed by Three Dragons. This work has been examined independently by a Planning Inspector at the Joint Core Strategy hearings.	n/a
Cherwell & South Northants DC	CIL must leave a buffer and cannot be charged at the maximum headroom.	CIL Guidance states that all approaches must be explained clearly. The viability work has been updated and continuous work by the Partner Councils illustrates improving house prices providing a robust support to the approach taken.	n/a
Coventry and Warwickshire Local Enterprise Partnership	Supports the evidence and has no further comments to make.	Response noted.	n/a
D Neale	The evidence base is flawed as sales rates in rural areas are nowhere near £220 per sq ft. In Crick they are £170 per sq ft.	Viability evidence has been undertaken by professional consultants GVA. They are assured that appropriate assumptions have been made in support of their work.	Charging authorities will increase the rate for smaller sites which fall below the

Respondent	Comment	Partner Council Response	Action
		<p>The viability work has been updated and continuous work by the Partner Councils illustrates improving house prices providing robust support to the approach taken.</p> <p>It was previously recognised by our consultants that smaller sites, without the requirement of supply affordable housing, are more capable of sustaining a higher CIL rate. Previous CIL Regulations and Guidance did not support this approach.</p>	affordable housing threshold.
Duston Parish Council	Monies should be spent on community amenities.	<p>Response noted. The R123 List (a list of projects that will benefit from CIL funds) will be available alongside the Draft Charging Schedule consultation and stakeholders will have an opportunity to comment at that stage.</p> <p>It is also noted that the CIL Regulations provide for 15 to 25% of the levy arising from developments within parish council areas to be passed directly to those parish councils. In parishes with a neighbourhood plan in place, the proportion will be 25% uncapped. In parishes without a neighbourhood plan the proportion will be 15% and capped at £100 per dwelling in the parish per year.</p>	Draft R123 List prepared for next consultation.

Respondent	Comment	Partner Council Response	Action
		In unparished areas the council will be able to use the proportion for local priorities in consultation with local residents.	
Framptons	Information is not sufficient and robust. Key infrastructure costs not included.	Response noted. Infrastructure need is shown in the Infrastructure Delivery Plan and is further supported by the CIL Background Paper to be made available alongside the Draft Charging Schedule consultations.	CIL Background paper to be made available during consultation on Draft Charging Schedules.
Francis Jackson Homes Ltd (Gladman Developments)	Ensure CIL levels are not too high.	GVA are confident that the proposed CIL rates are at a level which would not put overall development across West Northamptonshire at serious risk.	n/a
Gladman Developments	CIL rates must not threaten Local Plans.	GVA are confident that the proposed CIL rates are at a level which would not put overall development across West Northamptonshire at serious risk.	n/a
Hampton Brooks Estate Ltd	CIL must not hinder development.	GVA are confident that the proposed CIL rates are at a level which would not put overall development across West Northamptonshire at serious risk.	n/a
HBF Consortium	HBF Consortium express these concerns through specific analysis of key assumptions within the GVA CIL Economic Viability Assessment relating to matters including Development Profit; Professional	Viability evidence has been undertaken by professional consultants GVA. They are assured that appropriate assumptions have been made in support of their work. The CIL Viability Study has been updated	CIL Viability Study update to provide further clarification.

Respondent	Comment	Partner Council Response	Action
	Fees (specifically on SUEs); Section 106 Assumptions; Contingency; Viability Buffers; Planning Promotion Costs; Affordable Housing; Benchmark Land Values (specifically for SUEs); and the resulting Interpretation of Results in setting the proposed CIL rates.	to provide more clarification on the work assessed.	
Highcross Strategic Advisers Ltd	Insufficient evidence to demonstrate these assumptions. No appropriate buffer, rates appear to be at the maximum level.	CIL Guidance states that all approaches must be explained clearly. The viability work has been updated and continuous work by the Partner Councils illustrates improving house prices providing a robust support to the approach taken.	n/a
Highways Agency	Welcoming of a CIL charge.	Response noted.	n/a
Kimbell Trust	GVA assessment of the house prices is flawed largely because of it reflects the same methodology of the Three Dragon's study which is flawed.	GVA are confident that the proposed CIL rates are at a level which would not put overall development across West Northamptonshire at serious risk. Viability work completed by Three Dragons has been examined independently by a Planning Inspector at the Joint Core Strategy hearings.	n/a
Kleinwort Benson as Trustees of the Muriel Jackson-	Evidence base ignores realistic build costs.	Viability evidence has been undertaken by professional consultants GVA and adheres to national guidance on viability.	n/a

Respondent	Comment	Partner Council Response	Action
Stops Settlement		They are assured that appropriate assumptions have been made in support of their work.	
Mr. Moore	New development should be targeted at brownfield sites.	Response noted. The Joint Core Strategy aims to maximise the urban capacity across West Northamptonshire.	n/a
National Farmers Union	CIL should be reduced for rural areas.	Viability evidence has been undertaken by professional consultants GVA. Their work illustrates that residential development in rural areas is capable of meeting a higher CIL rate. CIL Guidance states that all approaches must be explained clearly. The viability work has been updated and continuous work by the Partner Councils illustrates improving house prices providing a robust support to the approach taken. They further propose a higher CIL rate for sites which fall below the affordable housing threshold. The approach to differential charging based on size is now supported by the CIL Regulations (as amended 2014).	The Partner Councils propose a higher rate for rural sites below the affordable housing threshold.
Natural England	Local Plan should be Habitat Regulation Assessment compliant.	Response noted.	n/a
Northampton County Council –	The level of affordable contributions from both CIL and s106 identified in the	The Partner Councils must balance the cost of funding infrastructure with the	The Partner Councils will present evidence

Respondent	Comment	Partner Council Response	Action
Highways, Transport and Infrastructure	consultation documentation raise serious concerns about the deliverability of the key elements of transport infrastructure necessary to open up the Sustainable Urban Extension for development.	viability of development. The CIL charges proposed, combined with assumptions for s106 contributions, are comparable with current s106 negotiations.	<p>of historic s106 agreements and provide information to support their judgement on the appropriate balance for Examination.</p> <p>The Partner Councils will continue to work collectively with service providers to identify alternative and supplementary funding mechanisms and ensure the timely delivery of infrastructure.</p>
Northampton County Council – Planning and Policy	Affordability of other infrastructure and modal shift measures necessary to mitigate the impact of development on existing communities and in particular to reduce the level of congestion which would otherwise be forecast to achieve the ambition of Joint Core Strategy must be seriously called into question.	<p>The Joint Core Strategy has been subject to Examination and the Infrastructure Delivery Plan (IDP) forms part of the evidence base in support of the Plan. The IDP is updated annually and is a living draft. Both documents have been made available during consultations.</p> <p>All relevant service providers have</p>	n/a

Respondent	Comment	Partner Council Response	Action
		<p>agreed that the infrastructure projects identified within the IDP will accommodate the levels of growth across West Northamptonshire. Site promoters have not indicated any issues regarding the deliverability of sites.</p>	
Pegasus Group	<p>It is clear that an appropriate balance between the desirability of funding infrastructure from the levy and the potential effects of the levy upon the economic viability of development across West Northamptonshire has not been met with regard to the majority of the SUEs as they are situated within low value areas.</p>	<p>The Joint Core Strategy has been subject to Examination and the Infrastructure Delivery Plan (IDP) forms part of the evidence base in support of the Plan. The IDP is updated annually and is a living draft. Both documents have been made available during consultation.</p> <p>All relevant service providers have agreed that the infrastructure projects identified within the IDP will accommodate the levels of growth across West Northamptonshire. Site promoters have not indicated any issues regarding the deliverability of sites.</p> <p>The CIL charges proposed, combined with assumptions for s106 contributions, are comparable with current s106 negotiations.</p>	<p>The Partner Councils will present evidence of historic s106 agreements and provide information to support their judgement on the appropriate balance for Examination.</p> <p>The Partner Councils will continue to work collectively with service providers to identify alternative and supplementary funding mechanisms and ensure the timely delivery of infrastructure.</p>

Respondent	Comment	Partner Council Response	Action
Persimmon Homes/ Bloor Homes/ Barratt Homes	CIL rates do not achieve an appropriate balance between the desirability of funding infrastructure from CIL and the potential effects of the economic viability of development.	<p>The Joint Core Strategy has been subject to Examination and the Infrastructure Delivery Plan (IDP) forms part of the evidence base in support of the Plan. The IDP is updated annually and is a living draft. Both documents have been made available for consultation.</p> <p>All relevant service providers have agreed that the infrastructure projects identified within the IDP will accommodate the levels of growth across West Northamptonshire. Site promoters have not indicated any issues regarding the deliverability of sites.</p> <p>The CIL charges proposed, combined with assumptions for s106 contributions, are comparable with current s106 negotiations.</p>	<p>The Partner Councils will present evidence of historic s106 agreements and provide information to support their judgement on the appropriate balance for Examination.</p> <p>The Partner Councils will continue to work collectively with service providers to identify alternative and supplementary funding mechanisms and ensure the timely delivery of infrastructure.</p>
Portfutures & UKSL	We consider that progress with CIL should be postponed until the JPU has progressed further work with the local plan SA/SEA and housing needs assessment work that has to be carried out or alternatively that, given the current debate at the local plan EIP over infrastructure and viability.	Response noted. The Joint Core Strategy Part I has been examined independently by a Planning Inspector.	n/a

Respondent	Comment	Partner Council Response	Action
Prologis UK Limited	Mainly agree with the questionnaire.	Response noted.	n/a
Ropemaker Properities Limited	Respondent concludes that Northampton Borough Council should be mindful of forthcoming legislative changes in the progression of their CIL and so we reiterate our view that further evidence must be given.	Response noted. The Partner Councils are mindful of legislative changes. The Draft Charging Schedules have been prepared in line with Guidance and legislation.	n/a
Rugby Borough Council	Supports the evidence.	Response noted.	n/a
Sport England	We are concerned that the infrastructure delivery plan may be based on evidence that is out of date or indeed not available.	The Infrastructure Delivery Plan (IDP) is updated annually to reflect the continuous engagement with service providers. This plan will also be informed by new evidence produced in support of the Part II Local Plans.	Partner Councils to ensure that work to update infrastructure evidence in support of the Part II Local Plans is reflected in future iterations of the IDP.
The Theatres Trust	We support the nil rate for 'all other uses' for Daventry DC, Northampton BC and South Northampton DC.	Response noted.	n/a
University of Northampton	Imposing a CIL charge for retail developments in a fragile market makes it less likely developers will be able to afford these uses which provide amenity and employment. It will make some development unviable.	Viability evidence has been undertaken by professional consultants GVA. Their work illustrates that retail development is capable of meeting a CIL rate.	

Respondent	Comment	Partner Council Response	Action
Walgrave Parish Council	We do not agree with the proposed level of investment as a general rule. This is because the context is different for different communities. Infrastructure in rural localities is not well provided.	Infrastructure to be wholly or partly delivered by CIL will be available for consultation within the R123 List at the same time as the Draft Charging Schedule. It is also noted that the CIL Regulations provide for 15 to 25% of the levy arising from developments within parish council areas to be passed directly to those parish councils. In parishes with a neighbourhood plan in place, the proportion will be 25% uncapped. In parishes without a neighbourhood plan the proportion will be 15% and capped at £100 per dwelling in the parish per year. In unparished areas the council will be able to use the proportion for local priorities in consultation with local residents.	Draft R123 List prepared for next consultation.
West Haddon Parish Council	Principle interest is in Residential Rural Zone levy rate, so have some concerns with the possible effect of having one rate for whole of the Daventry District Council Rural area given that there are one or two house price hotspots identified. This price hotspot and the flat rate for the district will quite clearly have a greater attractiveness	Increasing the complexity of the charge makes CIL calculation and collection increasingly difficult. The Regulations provide that CIL should not be overly complex. Whilst some rural areas might viably be able to afford a higher CIL charge, the Charging Authorities have simplified the charging zones to maintain	Following amendments to the CIL Regulations in 2014, the Partner Councils are proposing a higher rate for sites below the affordable

Respondent	Comment	Partner Council Response	Action
	to swing development to these areas given a greater margin will be accrued.	a balance between projected returns and administrative burden. However, it was previously recognised by our consultants that smaller sites, without the requirement of supply affordable housing, are more capable of sustaining a higher CIL rate. Previous CIL Regulations and Guidance did not support this approach.	housing threshold.
Whittlebury Parish Council	The Council has insufficient information to form a judgement as to whether the proposed preliminary draft charging schedule at section 7 of the consultation paper is either acceptable or sufficient to provide the necessary support for new development.	Response noted. The Charging Authorities are able to provide support and assistance to Parish Councils at any stage to provide more information on the CIL process.	Partner Councils to provide support and assistance as requested and required for Parish Councils.
William Davis Ltd	Concerned that the approach towards assessing acceptable uplift from 'benchmark' land values, in the Viability Assessment, is unrealistic.	Viability evidence has been undertaken by professional consultants GVA. They are assured that appropriate assumptions have been made in support of their work. The CIL Viability Study has been updated to provide more clarification on the work assessed.	CIL Viability Study updated.
WNDC	The balance between the desirability of funding infrastructure from CIL and the potential effects of the charge on the economic viability of developments needs	Government guidance suggests a review of CIL as economic conditions improve or worsen. It is intended that the Partner Councils will monitor the implementation	Adopted CIL Charging Schedules will be monitored annually.

Respondent	Comment	Partner Council Response	Action
	to be kept when/if economic conditions improve/worsen. The CIL rates therefore need to be flexible.	of CIL alongside delivery of residential and retail development.	
Question 2			
Do you agree that the West Northamptonshire Infrastructure Delivery Plan (July 2012) demonstrates a funding gap that provides sufficient justification for the introduction of CIL within each of the local authority areas?			
Asda Stores Ltd	There is a concern that as local authorities will still seek site- specific commitments under the s106 regime as well as CIL that the two charges together represent an unreasonable double levy for infrastructure which is seemingly being placed onto a very limited category of development.	Local authorities cannot seek site-specific commitments under S.106, for infrastructure that is to be provided through CIL. The Viability work completed by GVA provides evidence as to which types of development are able to sustain a CIL charge.	n/a
Barwood Land & Estates Ltd	Needs to be sure of objective assessment of housing needs number before comments can be made on CIL.	Comments can therefore only be made once West Northamptonshire Joint Core Strategy is adopted. To ensure the timely provision of infrastructure it is necessary for the Partner Councils to pursue the CIL charging regime in advance of adoption.	n/a
Brixworth Parish Council	I feel that we have to rely on the statement that there is a funding gap here although quantifying it is beyond our ability. The projected increase in housing completions over the years 12/13 to 24/25 would	Agreed. Response noted.	n/a

Respondent	Comment	Partner Council Response	Action
	certainly seem to create a funding gap.		
Cherwell & South Northants DC	Any CIL charging rate would to be appropriate, tested and viable. If viable CIL rate were to be so low (e.g. £5-£10) as to be uneconomic to collect, then it might be better to simply secure this through s.106 means, and consider the option of not adopting the use of CIL.	It is not expected that CIL rates will be set so low as to be uneconomic to collect. However, if viable CIL rates were to be set so low as to be uneconomic to collect, then local authorities have the option of not adopting use of CIL. The Partner Councils also recognise that there are strategic infrastructure projects required to support the Joint Core Strategy Part I. Some of these projects would not be capable of delivery under the pooling restrictions for s106 to be imposed from April 2015.	n/a
Duston Parish Council	Money should be spent on community amenities etc.	CIL receipts will be spent in accordance with the Infrastructure Delivery Plan and Reg123 Lists. Parish Councils will receive a percentage of CIL receipts to spend on community amenities, etc.	n/a
English Heritage	Should recognise the importance of historical sites.	Response noted.	n/a
Framptons	The information which has been provided is not sufficient and robust.	Have not specified in what way the information is considered insufficient and not robust. Viability evidence has been undertaken by professional consultants GVA. They are assured that appropriate assumptions	n/a

Respondent	Comment	Partner Council Response	Action
		have been made in support of their work. The CIL Viability Study has been updated to provide more clarification on the work assessed.	
Gladman Developments	Funding gap - The Council needs to ensure that they have a full understanding of the potential costs of infrastructure projects needed to meet the infrastructure needs. Gladman believe that it is inappropriate to set the levy based on a partial understanding of these infrastructure costs and in particular if the total money needed for infrastructure is unknown.	Not agreed. The costs of infrastructure needed to serve new development have been identified sufficiently through the IDP, to clearly identify a significant funding gap and allow setting of appropriate and viable CIL charging rates. This work is further supplemented by the CIL Background Paper available alongside the Draft Charging Schedule consultations.	CIL Background Paper to be made available alongside the Draft Charging Schedules.
Hampton Brook Estates Ltd	Further work on objectively assessed need and SA work is required before they make a comment.	Comments can therefore only be made once West Northamptonshire Joint Core Strategy is adopted. To ensure the timely provision of infrastructure it is necessary for the Partner Councils to pursue the CIL charging regime in advance of adoption.	n/a
HBF Consortium	CIL rates should be based on accurate estimates of known site-specifics.	CIL rates are based on viability assessment. Site-specific requirements will continue to be provided for under the S.106 regime, but only if they have not been funded through a CIL charge.	n/a

Respondent	Comment	Partner Council Response	Action
Highcross Strategic Advisers Ltd	The Infrastructure Needs Assessment does not seek to identify accurate costs of projects. There is a lack of clarity and justification and therefore a sound funding gap has not been justified in this instance to justify the levels of CIL set out.	Not agreed. The costs of infrastructure needed to serve new development have been identified sufficiently through the IDP, to clearly identify a significant funding gap, and allow setting of appropriate and viable CIL charging rates. This work is further supplemented by the CIL Background Paper available alongside the Draft Charging Schedule consultations.	CIL Background Paper to be made available alongside the Draft Charging Schedules.
Highway Agency	The HA considers that the evidence presented by the authorities demonstrates that there will be significant infrastructure funding gap across the West Northamptonshire area and in each separate charging authority.	Agreed. This work is further supplemented by the CIL Background Paper available alongside the Draft Charging Schedule consultations.	CIL Background Paper to be made available alongside the Draft Charging Schedules.
Kimbell Trust	It is impossible to verify as only the JPU has access to the background information. What is not clear is whether the funding gap takes into account existing s.106 agreements? And future s.106 agreements between now and when CIL is adopted and enforced?	CIL rates are based on GVA viability assessment, which is available on-line. Site-specific requirements will continue to be provided for under S.106 regime, but only if they have not been funded through CIL charge.	The updated presentation of the CIL related funding gap to be presented in a Background Paper.
Kleinworth Benson as Trustee of the Muriel Jacks-	Charging rates for the land owned by the Trustees should be lower to reflect the requirements for developments.	CIL charging rates are applied uniformly. Issues of viability for individual sites will continue to be addressed through the	n/a

Respondent	Comment	Partner Council Response	Action
Stops Settlement		S.106 regime.	
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Noted. There will be a further chance to comment when the Draft Charging Schedule is consulted on.	Partner Councils to provide support and assistance as requested and required to Parish Councils.
Mr. Moore	Should be spent on more schools, healthcare and roads.	A draft R123 List is to be provided for the Draft Charging Schedule consultation.	Draft R123 List to be provided at consultation.
NHS Property Services Ltd	A funding gap of 9.3m for healthcare was identified in the IDP. This is a significant sum, and with the phasing out of s.106 contributions from April 2014, there is no other viable planning mechanism which can help to adequately address this deficit.	S.106 contributions are not being phased out, and can still be sought on individual sites, provided that developers have not contributed towards healthcare through CIL charge.	n/a
Northamptonshire County Council – Highways and Infrastructure	Northamptonshire County Council, as highway authority agrees that there is a large funding gap in the monies available for infrastructure provision. Worryingly this funding gap is largest with regard to highway infrastructure; therefore the introduction of CIL as one of the measures to support funding of infrastructure is welcome.	Agreed and response noted.	The Partner Councils will continue to work collectively with service providers to identify alternative and supplementary funding mechanisms and ensure the timely delivery of infrastructure.

Respondent	Comment	Partner Council Response	Action
Northamptonshire County Council Planning and Policy	The county council agrees that there is a large funding gap in the monies available for infrastructure provision. Worryingly this funding gap is largest with regards to highway infrastructure; therefore the introduction of CIL as one of the measures to support funding of infrastructure is welcome.	Agreed and response noted.	The Partner Councils will continue to work collectively with service providers to identify alternative and supplementary funding mechanisms and ensure the timely delivery of infrastructure.
Pegasus Group Ltd	It is necessary to ensure that the s106 requirements sought by the JPU in addition to the proposed CIL charges are not onerous and are also “carefully considered in the context of viability”.	Agreed, but note that any S.106 requirements will continue to be sought by the individual Partner Councils, not the JPU.	n/a
Persimmon Homes/Bloor Homes/ Barratt Homes	Pegasus considers that the proposed CIL rates do not achieve an appropriate balance between the desirability of funding infrastructure from CIL and the potential effects of the economic viability of development.	In accordance with the Regulations, CIL rates have to be set so as to leave development viable.	n/a
Portfutures and UKSL	We consider that progress with the CIL should be postponed until the JPU has progressed further work with the local plan SA/SEA and housing needs assessment work that has to be carried out or alternatively that, given the current debate	CIL cannot be adopted until after the Joint Core Strategy has been adopted.	n/a

Respondent	Comment	Partner Council Response	Action
	at the local plan EIP over infrastructure and viability.		
Sports England	We are concerned that the infrastructure delivery plan may be based on evidence that is out of date or indeed not available.	The Infrastructure Delivery Plan (IDP) is updated annually to reflect the continuous engagement with service providers. This plan will also be informed by new evidence produced in support of the Part II Local Plans.	Partner Councils to ensure that work to update infrastructure evidence in support of the Part II Local Plans is reflected in future iterations of the IDP.
Walgrave Parish Council	DDC needs are underestimated due to apparent lack of budget for cultural development and public realm.	Not agreed, as DDC 'needs' form part of viability assessment and IDP.	n/a
West Haddon	The delivery plan doesn't drive down into infrastructure need potential in light of development progress throughout life of a plan as any patterns emerge. Little account of social infrastructure needs alongside structural infrastructure at macro level.	Not agreed, as 'infrastructure need potential' forms part of viability assessment and IDP.	n/a
Whittlebury Parish Council	The Council has insufficient information to form a judgement as to whether the proposed preliminary draft charging schedule at section 7 of the consultation paper is either acceptable or sufficient to provide the necessary support for new	Noted. There will be a further chance to comment when the Draft Charging Schedule is consulted on.	Partner Councils to provide support and assistance as required to Parish Councils.

Respondent	Comment	Partner Council Response	Action
	development.		
Wildlife Trust	We would like to make sure that investment into Green Infrastructure and the natural environment is given comparable weighting when deciding which of the competing infrastructure types will receive funding through mechanisms such as CIL.	Noted. Final allocation of any CIL receipts will be decided by the partner authorities, at the appropriate stage.	n/a
WNDC	Transport and Education infrastructure require the most funding out of all types suggested in each authority's preliminary drafting schedule. The drafting schedule also shows these two types of infrastructure have the largest funding gaps. There is an estimated overall gap of £439.6m. Improving infrastructure is a catalyst for further development.	Noted. Final allocation of any CIL receipts will be decided by the partner authorities, at the appropriate stage.	n/a
Question 3			
Do you agree with the Proposed Residential Charging Rates: Urban Zone (Including Strategic Urban Extensions (SUEs) - £50 per sqm?			
Brixworth Parish Council	These charges seem to be rationally based.	Response noted.	N/a

Respondent	Comment	Partner Council Response	Action
Cherwell and South Northants District Councils	Please refer to response to Question 1, above. Any CIL charge rate would have to be viable, and if a viable rate were to be so low (e.g. £5-£10) as to be uneconomic to collect, then might be better to consider the option of not adopting use of CIL.	<p>The CIL Viability Study acknowledges that the urban areas of Northampton and Daventry are predominantly 'low value' areas. Therefore a nominal rate of £50/sqm is proposed.</p> <p>It is not expected that CIL rates will be set so low as to be uneconomic to collect. However, if viable CIL rates were to be set so low as to be uneconomic to collect, then local authorities have the option of not adopting use of CIL.</p> <p>The Partner Councils also recognise that there are strategic infrastructure projects required to support the Joint Core Strategy Part I. Some of these projects would not be capable of delivery under the pooling restrictions for s106 to be imposed from April 2015.</p>	N/a
Deanshanger Parish Council	Deanshanger Parish Council tried to complete the response form but felt they could not answer the questions. They are very specific and the information provided is not sufficient to answer properly. There is concern about different bands for rural and urban – surely the levy should be uniform across the county.	The different charging zones reflect differences in residential values within the sub-region. This approach is informed by evidence and is supported by guidance. It is regrettable that Deanshanger Parish Council felt they were unable to fully respond to the consultation. However town and parish councils were supplied with all relevant documentation necessary	Partner Councils to provide support and assistance as required to Parish Councils.

Respondent	Comment	Partner Council Response	Action
		to provide a response to the consultation on the Preliminary Draft Charging Schedule.	
Framptons	It is considered that further justification for the proposed charging rates should be provided as the document progresses towards adoption. The charging rates should differentiate between Previously Developed Land and Greenfield sites. Presently it is considered that insufficient justification has been included in consultation document and evidence base papers.	<p>The guidance requires Charging Authorities to use an area-based approach which involves a broad test of viability across the area to underpin their charge. A range of development scenarios has been tested. Future development is expected to come forward on a range of sites including both brownfield and greenfield land.</p> <p>The CIL Economic Viability Study anticipates that based on the Joint Core Strategy, the majority of development (excluding the SUEs) will be brought forward on previously developed land. This includes rural areas where development is expected to be predominantly within settlement boundaries and has either been previously developed or has significant hope value due to planning policy allocation. Where the current use is agricultural or horticultural, the study assumes the landowner will require a</p>	n/a

Respondent	Comment	Partner Council Response	Action
		<p>minimum land price of £247,000 per hectare.</p> <p>It is therefore considered that the range of scenarios tested broadly reflect the likely form of future development as indicated by the Joint Core Strategy.</p>	
Gladman Developments	<p>Local planning authorities need to be able to demonstrate the infrastructure need and subsequent gap and must ensure that the level of total CIL receipts that could be generated through the levy reflects these true needs and the proposals in the Local Plan. The CIL should not be used by Council's as a mechanism for creating an unrealistic 'wish list' of infrastructure projects in their area.</p>	<p>On behalf of the Partner Councils, the Joint Planning Unit publishes an annual update of the Infrastructure Delivery Plan (IDP). The IDP identifies infrastructure necessary to implement the Joint Core Strategy and indicates a funding gap. Due to the funding gap, the Partner Councils feel it is justified and appropriate to implement a CIL charge.</p> <p>The Charging Authorities intend to publish draft Regulation 123 Infrastructure Lists alongside the Draft Charging Schedule. The authorities' Infrastructure Lists will be informed by the IDP.</p>	<p>Draft R123 to be available at consultation. Background Paper to outline CIL related funding gap in more detail.</p>
Hampton Brook Estate Ltd	<p>Ensure that CIL does not stifle development.</p>	<p>The CIL Economic Viability Study identifies the urban areas of Northampton and Daventry as 'low value' and Brackley and Towcester as 'medium value'. The</p>	<p>n/a</p>

Respondent	Comment	Partner Council Response	Action
		<p>study acknowledges that much of the development in West Northamptonshire will be brought forward at Strategic Urban Extensions (SUEs) and that the SUEs may experience higher enabling costs.</p> <p>In light of the evidence, the partner authorities are proposing a nominal CIL charge of £50/sqm in the urban zone.</p>	
HBF Consortium	Certain elements of the evidence need to be revised and made readily available.	<p>The CIL is being worked up alongside the preparation of the Joint Core Strategy and informed by an up-to-date evidence base. The documentation relating to the CIL is available via the West Northamptonshire Joint Planning Unit's website.</p> <p>Viability evidence has been undertaken by professional consultants GVA. They are assured that appropriate assumptions have been made in support of their work. The CIL Viability Study has been updated to provide more clarification on the work assessed.</p>	CIL Viability Study updated.
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	It is regrettable that Litchborough Parish Council felt they were unable to fully respond to the consultation. However all	Partner Councils to provide support and assistance as

Respondent	Comment	Partner Council Response	Action
		town and parish councils were supplied with all documentation necessary to provide a response to the consultation on the Preliminary Draft Charging Schedule.	required to Parish Councils.
Moulton Parish Council	Charges should be £150 sq m for all developments, rural and SUE.	The evidence presented in the CIL economic viability study does not support a £150 per sqm rate in the urban zone including SUEs. Residential sales values are lower in the urban zone than the rural zone. In addition, development at SUEs is expected to require higher enabling costs than other sites.	n/a
Mr. Moore	The areas identified as SUE should be treated the same as rural areas and charged at £150 per sqm.	It is estimated that the SUEs will experience sales values in line with the adjoining current market areas in Northampton, Daventry, Brackley and Towcester and are therefore included within the Urban Zone.	n/a
Northamptonshire County Council Planning and Policy	CIL rate proposed seems fair for Northants and Daventry however; it seems low for Towcester and Brackley.	The evidence suggests that Brackley and Towcester command higher residential values than Northampton and Daventry. The CIL Economic Viability Study identifies Towcester and Brackley as 'medium value'. The SUEs adjoining each may therefore benefit from the higher prices. However as they will have	n/a

Respondent	Comment	Partner Council Response	Action
		<p>the same issues concerning enabling costs, it is believed there is a strong case to treat those SUEs in the same way as the SUEs located at Northampton and Daventry.</p>	
Pegasus Group Ltd	<p>It is considered that the boundary line for the Rural Zone and the SUE should also be reviewed following the WNJCS Examination.</p>	<p>It is noted that the boundaries of the SUEs are subject to review through the examination process. The Joint Planning Unit presented Proposed Modifications to the Joint Core Strategy in March 2014. Those modifications do include amendments to the boundaries of certain SUEs. The CIL Viability Study has been reviewed accordingly.</p> <p>The Urban and Rural Charging Zones must therefore reflect the boundaries of the SUEs indicated in the West Northamptonshire Joint Core Strategy (should the document be found sound and adopted by the partner authorities).</p>	<p>Amend Urban and Rural Charging Zones to reflect SUE boundaries following the Joint Core Strategy examination.</p>
Persimmon Homes/Bloor Homes/ Barratt Homes	<p>Pegasus considers that the proposed CIL rates do not achieve an appropriate balance between the desirability of funding infrastructure from CIL and the potential effects of the economic viability of development.</p>	<p>The CIL Economic Viability Study identifies the urban areas of Northampton and Daventry as 'low value' and Brackley and Towcester as 'medium value'. The study acknowledges that much of the development in West Northamptonshire</p>	<p>The Partner Councils will present evidence of historic s106 agreements and provide information to support their</p>

Respondent	Comment	Partner Council Response	Action
		<p>will be brought forward at the Strategic Urban Extensions (SUEs), and that the SUEs may experience higher enabling costs.</p> <p>In light of the evidence, the partner authorities are proposing a nominal CIL charge of £50/sqm in the urban zone.</p>	<p>judgement on the appropriate balance for Examination.</p> <p>The Partner Councils will continue to work collectively with service providers to identify alternative and supplementary funding mechanisms and ensure the timely delivery of infrastructure.</p>
Profutures and UKSL	Refer to question 1.	The CIL is being worked up alongside the preparation of the Local Plan (i.e. the West Northamptonshire Joint Core Strategy) as recommended by national policy.	n/a
University of Northampton	Imposing a CIL charge for retail developments in a fragile market makes it less likely developers will be able to afford these uses which provide amenity and employment. It will make some development unviable.	In working up a CIL the authorities have adopted an area-based approach which involves a broad test of viability across their area as evidence to underpin the charge. Inevitably there is a risk that some development proposals may be unviable. In setting a CIL, the Partner Councils are seeking to strike a balance	

Respondent	Comment	Partner Council Response	Action
		between securing additional investment for infrastructure to support development, and the potential economic effect of imposing the levy upon development across the area.	
West Haddon Parish Council	Little account for social infrastructure needs alongside structural infrastructure at a macro level.	The Infrastructure Delivery Plan (IDP) supports the Joint Core Strategy and identifies the infrastructure required to deliver new development over the plan period. The IDP has been prepared through consultation with service providers. It should be noted that many service providers are working up strategic plans of their own to meet future needs. Furthermore the 'duty to pass CIL to local councils' will empower local communities to spend CIL funds on locally important infrastructure projects.	n/a
William Davis Ltd	Concerned that the approach towards assessing acceptable uplift from 'benchmark' land values, in the Viability Assessment, is unrealistic.	The 20% uplift from benchmark land values employed by the study is informed by the findings of recent examinations on other CIL studies; from national guidance (Viability Testing Local Plans, Local Housing Group, 2012); the consultants' (GVA) own experiences; and, the approach adopted by neighbouring authorities.	Review additional evidence if/when received.

Respondent	Comment	Partner Council Response	Action
		The partner authorities would encourage the respondent to submit additional evidence of current land values and landowner's expectations.	
WNDC	The identified SUE's differ in land value because of the different locations; however there are issues of enabling costs which create challenge to viability and sustainability. £50 per sqm for each CIL is consistent across West Northamptonshire. Therefore implementing a fixed rate for all SUE's allows for certain SUE's to contribute more within s106 in addition to CIL.	Response noted.	n/a
Question 4			
Do you agree with the Proposed Residential Charging Rates: Rural Zone - £150 per sqm?			
Cherwell & South Northants DC	Please refer to response to Question 1, above. Any CIL charge rate would have to be viable, and if a viable rate were to be so low (e.g. £5-£10) as to be uneconomic to collect, then might be better to consider the option of not adopting use of CIL.	Noted. Agreed that a low charge would not be viable to collect, however at the rates proposed it would be viable. Partner Councils can determine not to adopt a CIL at any time.	n/a
D Neale	Totally unviable as demonstrated by JPU's own study. Will prevent development coming forward in rural areas as will not	Viability evidence has been undertaken by professional consultants GVA.	Charging authorities will apply an increased the rate for

Respondent	Comment	Partner Council Response	Action
	stack up financially. Rates need to be much lower. Neighbouring Rugby's rate £50 per sqm in rural areas.	It was previously recognised by our consultants that smaller sites, without the requirement of supply affordable housing, are more capable of sustaining a higher CIL rate. Previous CIL Regulations and Guidance did not support this approach.	smaller sites which fall below the affordable housing threshold.
Deanshanger Parish Council	Not enough information provided.	The respondent has not indicated what information is lacking.	Partner Councils to provide support and assistance as required to Parish Councils.
Framptons	Information is not sufficient and robust.	The respondent has not indicated what information is lacking. Viability evidence has been undertaken by professional consultants GVA. They are assured that appropriate assumptions have been made in support of their work. The CIL Viability Study has been updated to provide more clarification on the work assessed.	n/a
Francis Jackson Homes Ltd	Assumes all areas are homogenous.	It is necessary to make broad assumptions , otherwise the system wold become more complex to evidence and more expensive to operate (if there were many different zones and rates for example)	n/a

Respondent	Comment	Partner Council Response	Action
Gladman Developments	Lower CIL rates would provide flexibility and reflect a more sustainable District.	See section 1 above	n/a
Gladman Developments	Differential charging rates - It is integral when setting differential rates for different geographical areas that these differential rates are based on accurate, up to date housing market intelligence forming the evidence base for this decision.	Noted. In defining areas for different rates it is necessary to strike a balance between reflecting local variations in values and setting up a system which is not overly complex.	n/a
Hampton Brooks Estates Ltd	Rural sites could have higher costs.	No evidence has been provided to support this view	n/a
HBF Consortium	Certain elements of the evidence need to be revised and made readily available.	In response to the consultation, GVA has updated the viability study which will be available during the next consultation.	GVA update Viability Study.
Kimbell Trust	<ul style="list-style-type: none"> As demonstrated in Section 1), the viability evidence is flawed and despite this the testing demonstrates that £150 per sqm of CIL is not viable. The maximum levy under the optimum scenario of £100 per sqm and it is considered that if £100 per sqm was adopted that would still be a major challenge and still generate double the receipts currently being generated by s.106 agreements if say looking at an average 100 sqm house on a medium sized development (Three Dragons study says s.106 average is £5k so 	See section 1 above	n/a

Respondent	Comment	Partner Council Response	Action
	<p>£10k would be double.</p> <ul style="list-style-type: none"> • A £100 per sqm rate would also be in line with Rugby with similar land values/house prices etc. as confirmed by GVA. In fact, the rural area charge in Rugby is £50 per sqm. 		
Kleinwort Benson as Trustees of the Muriel Jackson-Stops Settlement	Charging rates for SUEs are too high.	The respondent has not provided any evidence to support this view	n/a
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Response noted	Partner Councils to provide support and assistance as required to Parish Councils.
National Farmers Union	CIL should be reduced in rural areas.	<p>Viability evidence has been undertaken by professional consultants GVA.</p> <p>It was previously recognised by our consultants that smaller sites, without the requirement of supply affordable housing, are more capable of sustaining a higher CIL rate. Previous CIL Regulations and Guidance did not support this approach.</p>	Charging authorities will apply an increased rate for smaller sites which fall below the affordable housing threshold.
Northamptonshire County Council Planning and Policy	The proposed charging rates do reflect the current market which is currently depressed. To ensure that uplift in the	Noted. A review will be undertaken in due course, but there is no precise timetable currently.	n/a

Respondent	Comment	Partner Council Response	Action
	rising market is captured provision should be made for an early review when conditions change.		
Pegasus Group Ltd	Prices for CIL for the rural zone are too high.	See section 1 above	n/a
Portfutures and UKSL	See question 1.	-	-
Walgrave Parish Council	Cost of private transport and the inadequacies of public transport. The current cost of private transport and the inadequacies of public transport which has caused migration from rural areas. Should development take place this will need addressing.	Response noted.	n/a
West Haddon Parish	The answers don't provide the necessary response option. Given prior answers, price Hotspot in West Haddon would make development here more attractive as greater margins for residual land value are possible – is it sensitive enough?	<p>In defining areas for different rates it is necessary to strike a balance between reflecting local variations in values and setting up a system which is not overly complex.</p> <p>However, it was previously recognised by our consultants that smaller sites, without the requirement of supply affordable housing, are more capable of sustaining a higher CIL rate. Previous CIL Regulations and Guidance did not support this approach.</p>	Partner Councils propose to increase the rate for smaller sites which fall below the affordable housing threshold, this approach clarified through CIL Regulations (as amended 2014).

Respondent	Comment	Partner Council Response	Action
William Davis Ltd	Concerned that the approach towards assessing acceptable uplift from 'benchmark' land values, in the Viability Assessment, is unrealistic.	See section 1 above	n/a
Question 5 Do you agree with the Proposed Retail Charging Rates - £100 per sqm (excluding central zones in Daventry and Northampton)?			
ASDA Stores Ltd	<ul style="list-style-type: none"> • ASDA often can revitalise and rejuvenate areas where it sets up. • Propose flat rate across all development across its boundaries. • Provide draft instalment policy. • No evidence presented of s106 contributions. • Underestimate s106 and s278 contributions from retail schemes. 	<p>The partner authorities intend to publish a draft Instalment Policy for consultation alongside the publication of the draft Charging Schedule.</p> <p>The CIL Economic Viability Study assumes that there are no s106 obligations in respect of the schemes and that costs, such as s278 agreements are absorbed into the site enabling costs and/or CIL payment. However, in testing scenarios the study incorporates assumptions as to compliance with the BREEAM 'Very Good' standard and site preparation costs.</p> <p>The adoption of the CIL and changes to regulation regarding pooling of s106 contributions will require the partner authorities to review their policies for</p>	<p>Partner Councils to review retail proposals to confirm that in broad terms s106 costs are nil, or low.</p> <p>Partner authorities to undertake review of planning obligations policies.</p>

Respondent	Comment	Partner Council Response	Action
		imposing planning obligations through s106 agreements.	
Framptons	Information is not sufficient and robust.	The CIL Economic Viability Study tests a range of retail scenarios. It is not clear from the respondent what additional information is required. The respondent is invited to supply additional evidence to ensure the CIL is robust.	Review retail charge if/when additional evidence is supplied.
Gladman Developments	Differential charging rates - It is integral when setting differential rates for different geographical areas that these differential rates are based on accurate, up to date housing market intelligence forming the evidence base for this decision.	The CIL Economic Viability Study uses land registry data for all sold property, and is therefore considered accurate. However it is acknowledged that such data may require regular review to ensure it is kept up to date.	Explore the requirement to update study, to ensure current values are reflected.
Hampton Brook Homes	Retail is important for both economic growth and employment.	Response noted.	n/a
Highcross Strategic Advisers Ltd	Setting CIL levels at the maximum will not ensure viability and does not meet the funding gap.	A nil rate is proposed in the town centre for retail uses. Different retail scenarios provide a broad range of viability scenarios.	n/a
National Farmers Union	Support a nil levy on all other development but we object to the proposed CIL for retail development of £100 per sqm. This proposal would include marginal rural development like farm shops which I'm sure were not supposed to be included in the CIL proposals.	Planning permission is not normally required if an existing building is used as a farm shop only for the sale of unprocessed goods produced on that farm. However, where a farm shop sells significant amount of produce from elsewhere, planning permission may be	Partner authorities to provide clarity on the application of CIL.

Respondent	Comment	Partner Council Response	Action
		<p>required.</p> <p>In the first scenario, CIL is unlikely to be chargeable (perhaps the activity could be considered either ancillary or de minimis). Furthermore where there is no net gain to the floorspace of the existing building, CIL would not be applicable.</p> <p>In the second scenario, where planning permission is required, CIL is likely to be chargeable on any additional floorspace created from the proposal.</p>	
Northamptonshire County Council Planning and Policy	The proposed charging rates do reflect the current market which is currently depressed. To ensure that uplift in the rising market is captured provision should be made for an early review when conditions change.	It is intended that CIL will be subject to regular review to ensure rates appropriately reflect development viability.	n/a
Portfutures and UKSL	Refer to question 1.	Refer to question 1.	n/a
Ropemaker Properties Limited	Please see answer to question 1 – the rates proposed for different ‘intended uses’ cannot be supported by reference to Reg 14, without significantly more thorough and clearly evidenced justification being provided in an updated Economic Viability	The proposed rate for ‘other uses’ is nil. A range of development scenarios are tested indicating low viability.	n/a

Respondent	Comment	Partner Council Response	Action
	Assessment.		
University of Northampton	Imposing a CIL charge for retail developments in a fragile market makes it less likely developers will be able to afford these uses which provide amenity and employment. It will make some development unviable.	<p>In working up a CIL the authorities have adopted an area-based approach which involves a broad test of viability across their area as evidence to underpin the charge. Inevitably there is a risk that some development proposals may be unviable. In setting a CIL, the partner authorities are seeking to strike a balance between securing additional investment for infrastructure to support development, and the potential economic effect of imposing the levy upon development across the area.</p> <p>A nil rate is proposed in the town centre for retail uses. Different retail scenarios provide a broad range of viability scenarios.</p>	n/a
West Haddon Parish Council	The retail market will decide and the CIL rate will have little impact.	Response noted.	n/a
WNDC	The evidence base recognises there are higher development costs in the town centre of Northampton and Daventry; however a CIL rate of £100 per sqm is a reasonable contribution for outside the	Response noted.	n/a

Respondent	Comment	Partner Council Response	Action
	town centre.		
Question 6			
Do you agree with the proposed charging zones (see Section 7 of the Preliminary Draft Charging Schedule documents)?			
D Neale	Not sure whether they are lawful as per advice in GVA study.	Schedules have been prepared in accordance with CIL Regulations and guidance.	n/a.
Deanshanger Parish Council	They are very specific and the information provided is not sufficient to answer properly. There is concern about different bands for rural and urban – surely the levy should be uniform across the county.	The zones attempt to reflect variations in the value of development across the area, but as noted above a balance has to be struck between reflecting local variations in values and setting up a system which is not overly complex.	n/a
Francis Jackson Homes Ltd	Evidence is required to demonstrate the proposed CIL level is flexible and will not act as a barrier to housing and affordable housing delivery across the charging/plan area with more worked examples on a District by District basis.	A balance has to be struck between reflecting local variations in values and setting up a system which is not overly complex.	n/a
Gladman Developments	Areas are not homogenous.	Noted	n/a
Hampton Brook Estates Ltd	Current zoning appears to be overly simplistic and to the potential detriment of some sites especially falling within the higher charged rural zone. Drastic change in the price of zones (rural/urban).	A balance has to be struck between reflecting local variations in values and setting up a system which is not overly complex.	n/a

Respondent	Comment	Partner Council Response	Action
Kimbell Trust	No objection per sqm but questions the legality of this method - There have been high profile cases where supermarket operators have successfully challenged differential rates and been successful. The courts have ruled that you can only have one rate per land use, so just one flat rate for residential development. Most authorities with adopted CIL only have one rate and not charging zones.	Different rates per charging zone are permitted, provided this is supported by evidence	n/a
Kleinwort Benson	Wood Burcote Court, Towcester should be excluded from the charging zone to reflect special circumstances.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations. This would address concerns regarding site specific viability.	n/a
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Noted	Partner Councils to provide support and assistance as required to Parish Councils.
Moulton Parish Council	All zones should be equal.	This is not supported by the evidence	n/a
Mr. Moore	SUEs should be charged the same as the rural sites.	This is not supported by the evidence	n/a
Pegasus Group Ltd	Review the boundary line of rural and urban zones following the Core Strategy	Agree that this would be sensible	Review boundary between SUEs and

Respondent	Comment	Partner Council Response	Action
	examination.		rural areas following examination.
Portfutures and UKSL	Refer to question 1.	-	-
Ropemaker Properties Limited	Refer to question 1.	-	-
University of Northampton	Imposing a CIL charge for retail developments in a fragile market makes it less likely developers will be able to afford these uses which provide amenity and employment. It will make some development unviable.	In working up a CIL the authorities have adopted an area-based approach which involves a broad test of viability across their area as evidence to underpin the charge. Inevitably there is a risk that some development proposals may be unviable. In setting a CIL, the partner authorities are seeking to strike a balance between securing additional investment for infrastructure to support development, and the potential economic effect of imposing the levy upon development across the area. A nil rate is proposed in the town centre for retail uses. Different retail scenarios provide a broad range of viability scenarios.	n/a
West Haddon Parish Council	Wholly in line with Core Strategy – whether the zones will bring about the desired effect is pure speculation.	Noted	n/a

Respondent	Comment	Partner Council Response	Action
WNDC	The current mapping is in keeping with the CLG requirements of avoiding an overly complex operation of CIL. This is particularly relevant to the rural zone because it is made of up of many different Parishes. The CIL is therefore operating at a strategic rather than local level. If the Parishes were to be changed individually issues surrounding time, efficiently and confusion my arise, as further appraisals would need to take place and developers might find certain Parishes preferable to them based on lower CIL rates.	Noted	n/a
Question 7			
Do you agree that the CIL Economic Viability Assessment has assessed the overall economic viability of the development types most likely to occur in West Northamptonshire in the foreseeable future? If not, what other development types should be tested and what is your justification for this?			
Anyho Parish Council	Negative impact of new neighbourhood developments.	New 'neighbourhood developments' have been assessed.	n/a
D Neale	Has not tested for lower density development. Most developments in Daventry District are below 30 dwelling per hectare (dph).	All likely densities of development have been tested for.	n/a
Framptons	Why have certain development sites have been omitted?	Does not specify which (major) sites have been 'omitted'.	n/a
Hampton Brook Estates Ltd	Abnormal development costs not taken into account.	Any abnormal development costs can still be taken into account through the S.106	n/a

Respondent	Comment	Partner Council Response	Action
		regime, and assessing the viability of individual development sites.	
Highcross Strategic Advisers Ltd	Assessment has been undertaken at a very broad level.	Economic viability assessment has been undertaken to a sufficient level, to enable the setting of viable CIL rates.	n/a
Kimbell Trust	No minimum density is required anymore.	Agreed, but developments must still make best and most efficient use of land.	n/a
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Noted – there will be a further chance to comment when the Draft Charging Schedule is consulted on.	Partner Councils to provide support and assistance as required to Parish Councils.
Moulton Parish Council	Road improvements – infrastructure over DDC area is in need of review.	Response noted.	n/a
National Farmers Union	Agricultural and rural workers' dwellings should be exempted from CIL.	This is not a matter for local authorities, but could only be addressed through Government changes to the CIL Regulations.	n/a
NHS Property Services	Pleased that PDCS will not impose a CIL charge on any new healthcare facilities.	Response noted.	n/a
Pegasus Group Ltd	All major land uses assessed.	Agreed.	n/a
Persimmon Homes/Bloor Homes/Barratt Homes	Pegasus considerations that the proposed CIL rates do not achieve an appropriate balance between the desirability of funding infrastructure from CIL and the potential effects of the economic viability of	See Q2.	n/a

Respondent	Comment	Partner Council Response	Action
	development.		
Portfutures and UKSL	Refer to question 1.	Response noted.	n/a
Prologis UK Limited	Mainly agree with the questionnaire.	Response noted.	n/a
The Theatres Trust	We support the nil rate for 'all other uses' for Daventry DC, Northampton BC and South Northampton DC. Theatre uses are generally unable to bear the cost of CIL for viability reasons. The Theatres Trust therefore supports either the setting of a nil rate, the application of charitable or discretionary reliefs, applying D1/D2 rates where differential rates are proposed, or recycling the charge to the theatre development where a single rate is proposed.	Agreed.	n/a
West Haddon Parish Council	Agree in the main.	Response noted.	n/a
Question 8			
Do you consider the charging authorities should adopt a scheme of discretionary relief, so that in exceptional circumstances of economic viability developments that meet the essential criteria can be exempted from paying CIL?			
ASDA Stores Ltd	Decision is welcomed.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the	n/a

Respondent	Comment	Partner Council Response	Action
		Regulations.	
English Heritage	Do not put heritage sites at risk as a result of CIL.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
Framptons	Provide flexibility for major developments.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
Kleinwort Benson	A planning application for land at Wood Burcote Court, Towcester includes the creation of a new town park and the transfer of the land to Towcester Town Council together with a commuted sum for future management. It is considered that the gross value of the park and the commuted sum should be included in the calculation of CIL for any development proposed on the balance of the site.	The Regulations as amended allow for payments in kind.	n/a
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Response noted.	n/a
Moulton Parish Council	Additional developments should carry responsibility for infrastructure additions.	Response noted. CIL allows for a charge to be set against developments which might not previously have been required	n/a

Respondent	Comment	Partner Council Response	Action
		to contribute via a s106 agreement. This ensures that smaller developments contribute towards the cumulative impact on infrastructure.	
Mr. Moore	Everyone will ask for discretionary relief which will cost the courts a great deal.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
Northamptonshire County Council – Highways, Transport and Infrastructure	To strike a balance which ensures that relief is given where appropriate but is not at the expense of the delivery of the new improved infrastructure needed to support future development.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
Northamptonshire County Council Planning Policy	A scheme of relief should not be adopted by any local authorities or for SUE's.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
Pegasus Group Ltd	Highly likely schemes will experience difficulties and should have the option to be viability tested for relief and where necessary exemption, especially where schemes are required to provide a number of planning obligations through s106 agreements.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
Portfutures and	Refer to question 1.	-	-

Respondent	Comment	Partner Council Response	Action
UKSL			
The Theatres Trust	Refer to previous question.	-	-
West Haddon Parish Council	There should be a scheme of discretionary relief for Social housing and charitable purposes. These are not precursors for exceptional circumstances. Exceptional circumstances relief will only lead to lack of clarity, delay and expense to manage given everyone will want a go at it.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
WNDC	The need for a scheme of relief should be rare based upon the viability assessment of the CIL however to comply with Regs 56 the scheme should be provided. The scheme of relief can be removed if necessary if it appears the need to use the scheme increases.	The Partner Councils will consider responses before considering whether to adopt any CIL discretionary relief, beyond the statutory relief set out in the Regulations.	n/a
Question 9			
Do you consider that the charging authorities should have a policy for paying the chargeable amounts in instalments? If so, do you have a preference for how such a policy should be set, for example by percentages of the total amount and the length of time period in days?			
Asda Stores Ltd	Phasing and an instalment policy would work well.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
Brixworth Parish Council	We recommend quarterly instalments by equal percentages and capable of being apportioned by days.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for

Respondent	Comment	Partner Council Response	Action
			the next consultation.
Framptons	Instalment would be very similar to phasing under s106.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
Gladman Developments	Council should adopt an instalment policy.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
Hampton Brooks Estates Ltd	Introduce an instalment policy.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
HBF Consortium	Monitoring of CIL should take place on a 6-monthly basis.	The Regulations require Annual Reports to be made available for inspection. However, the Partner Councils recognise that CIL monitoring is an ongoing process.	Adopted CIL Charing Schedules will be monitored annually.
Kleinwort Benson	Payment by instalments should be allowed.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Response noted.	n/a
Mr. Moore	Instalments should be related to the	A draft instalment policy has been	A Draft Instalment

Respondent	Comment	Partner Council Response	Action
	completion of each dwelling.	prepared for consultation.	policy is available for the next consultation.
Northamptonshire County Council – Highways, Transport and Infrastructure	Instalment will result in delays in the provision of infrastructure.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
Northampton County Council Planning Policy	For all areas an instalments policy should be considered in order to avoid the upfront costs of CIL becoming a barrier to new housing.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
Pegasus Group Ltd	CIL paid by instalments should be allowed.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
Portfutures and UKSL	Refer to question 1.	-	A Draft Instalment policy is available for the next consultation.
Walgrave Parish Council	On cash payments: On approval of planning permission or receipt of liability notice – 33% Start of building (on commencement notice) – 33%, Completion – 34% ,On a land Transfer: All land transferred at approval – 100%	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.

Respondent	Comment	Partner Council Response	Action
West Haddon Parish Council	Benefit to community for CIL funds should impact as soon as possible and moreover where certain infrastructure projects inevitably will precede CIL income. Larger development schemes are almost always phased over time and pace fluctuates with scales, hence leading to unpredictability over cash flow emanating from CIL levies, if in fact they actually are delivered in full. Compounding effect on inflation on value over time should be avoided. Instalments should not be offered.	A draft instalment policy has been prepared for consultation.	A Draft Instalment policy is available for the next consultation.
WNDC	Instalments should reflect the type of development, for example the size, the location, the timescale for delivery etc. There should be checks and balances in place to mitigate such risks as unpaid CIL.	A draft instalment policy has been prepared for consultation. The Regulations provide the legislation necessary to initiate proceedings to recover unpaid CIL.	A Draft Instalment policy is available for the next consultation.
<p>Question 10 Infrastructure projects required to support new development, especially those identified in the West Northamptonshire Infrastructure Delivery Plan, may be candidates for receiving any CIL obtained. This first stage of consultation will help inform the projects that may be prioritised for funding through CIL. Suitable projects may be identified on the Councils' Regulation 123 List (the list of infrastructure projects and/or infrastructure types that CIL monies will be spent on). What do you consider should be included within the Councils Regulation 123 list?</p>			
Aynho Parish Council	<ul style="list-style-type: none"> Traffic impact relief projects to divert traffic induced by SNC and Cherwell Development Plans. In that traffic 	The County Council, as Highways Authority, and the Highways Agency, responsible for the Strategic Road	Draft R123 List prepared for next consultation.

Respondent	Comment	Partner Council Response	Action
	<p>through Aynho will double on top of the existing heavy burden we would like to see the provision of a relief road round the village.</p> <ul style="list-style-type: none"> The village already suffers acute noise, vibration and pollution impacts from the current volume of traffic. Bicester and Banbury combined have a plan for the provision of in excess of 16,000 new homes and 6 large industrial/retail developments by 2031, traffic volumes into and through the village will grow significantly exacerbated by the traffic flows from the SNC development plan. 	<p>Network, have advised the Joint Planning Unit and Partner Councils on highway improvements necessary as a result of growth outlined within the Joint Core Strategy. These agencies work closely to identify cross boundary issues.</p> <p>The draft R123 list will be made available for consultation and provides scope for different schemes to be identified throughout the plan period.</p>	
Boughton Parish Council	CIL must strike a balance within communities.	<p>Government legislation provides a proportion of CIL to be spent on areas directly impacted by development. The Partner Councils will work with communities to identify locally specific projects alongside those required across the strategic area of West Northamptonshire.</p> <p>The operation of CIL will require a percentage to be provided directly to Parish Councils.</p>	Draft R123 List prepared for next consultation.
Brixworth Parish Council	Priority should be given to roads and footways.	Response noted. Highways projects from the largest section of the Infrastructure	n/a

Respondent	Comment	Partner Council Response	Action
		Delivery Plan.	
Environment Agency	The Environmental Agency would welcome the opportunity to meet with the JPU and the Lead Local Authority to: Update the IDP to include the findings and recommendations of the SFRA's; Water Cycle Studies; Nene flood storage study; Northampton Standard of Protection review – Final Oct 2010; River Nene Catchment Flood Management Plan; Anglian River Basin Management Plan; and Local Flood Risk Management Study. Agree which green; water; and flood risk (fluvial and surface water) management infrastructure projects are most suitable for inclusion on the Councils' Regs 123 List.	Response noted. The Joint Planning Unit has actively engaged with the Environment Agency (EA) throughout development of the Joint Core Strategy. The EA is contacted prior to each update of the IDP and the Partner Councils are actively engaged with several strategic projects to identify green, water and flood risk projects.	n/a
Framptons	Costs should be accurate.	Costs are made available by service providers and are the best cost estimates for works available at the time of publication. Some projects, such as large Sustainable Urban Extensions, require masterplans prior to the completion of detailed infrastructure estimates. As plans advance, costs will become more detailed.	n/a
Hartwell Parish	Extension to school, Local Safety	The County Council, as Highways	Draft R123 List

Respondent	Comment	Partner Council Response	Action
Council	initiatives.	<p>Authority and Local Education Authority, and the Highways Agency, have advised the Joint Planning Unit and Partner Councils on highway and education improvements necessary as a result of growth outlined within the Joint Core Strategy.</p> <p>The draft R123 list, now available for consultation, provides scope for different schemes to be identified throughout the plan period.</p>	prepared for next consultation.
HBF Consortium	Highlight the importance of Regs 123 List.	The draft R123 list is now available for consultation and will be part of the package of documents available at Examination.	Draft R123 List prepared for next consultation.
Highways Agency	NGMS to be included in the Regs 123 List.	Response noted. The NGMS is included.	n/a
Kimbell Trust	Transport, Health and Education.	Response noted. The draft R123 list is now available for consultation. Some service providers consider that their service area might best be delivered via site specific s106 agreements. The R123 list reflects the discussions we have had with service providers.	Draft R123 List prepared for next consultation.
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Response noted.	n/a

Respondent	Comment	Partner Council Response	Action
Moulton Parish Council	CIL's should be used for the areas accepting new developments only, not for town centre improvements etc.	Some of the infrastructure impacts of development will be addressed by site specific s106 agreements. CIL is intended to address the cumulative impact of development and it is recognised that whilst this will include local projects such as road improvements, the cumulative development proposed across West Northamptonshire will have a significant impact on infrastructure items such as the strategic road network, service centres and green infrastructure networks.	n/a
Mr. Moore	Roads, sustainable transport plans, schools, hospitals, emergency services, provision of recreational and open space etc.	Response noted. The draft R123 list is now available for consultation. Some service providers consider that their service area might best be delivered via site specific s106 agreements. The R123 list reflects the discussions we have had with service providers.	Draft R123 List prepared for next consultation.
Natural England	<ul style="list-style-type: none"> Local Plan should be Habitat Regulation Assessment compliant. CIL plays an important role in delivering such a strategic approach. 	A Habitat Regulation Assessment has been completed for the Joint Core Strategy. Response noted.	n/a
Nene Valley Nature Improvement Area	<ul style="list-style-type: none"> Accessible natural green space should be included in all Regs 123 list. CIL is good way to fund some green infrastructure. 	Response noted. The draft R123 list, now available for consultation, provides scope for different schemes to be identified throughout the plan period.	Draft R123 List prepared for next consultation.

Respondent	Comment	Partner Council Response	Action
NHS Properties	<ul style="list-style-type: none"> The type of healthcare infrastructure that should be funded should not be limited to primary care but should also include mental health and acute secondary care. 	Response noted. The Partner Councils and Joint Planning Unit are actively engaged with healthcare providers to identify projects.	Continuation of collaboration with healthcare providers.
Northamptonshire County Council – Highways, Transport and Infrastructure	<ul style="list-style-type: none"> Highways, transport, education, health, utilities, community and leisure, open space and green infrastructure. All the various elements of infrastructure mentioned above are necessary to support the principles of sustainable development. 	Response noted. The draft R123 list is now available for consultation. Some service providers consider that their service area might best be delivered via site specific s106 agreements. The R123 list reflects the discussions we have had with service providers.	Draft R123 List prepared for next consultation.
Northamptonshire County Council Planning and Policy	<ul style="list-style-type: none"> Transport and highways, education, flooding, fire and rescue, library services, mineral, waste and culture. These are county council service areas that are directly affected by new development. All various elements of infrastructure mentioned above are necessary to support principles of sustainable development. 	Response noted. The draft R123 list is now available for consultation. Some service providers consider that their service area might best be delivered via site specific s106 agreements. The R123 list reflects the discussions we have had with service providers.	Draft R123 List prepared for next consultation.
Portfutures and UKSL	We consider that progress with the CIL should be postponed until the JPU has progressed further work with the local plan SA/SEA and housing needs assessment work that has to be carried out or	Response noted.	n/a

Respondent	Comment	Partner Council Response	Action
	alternatively that, given the current debate at the local plan EIP over infrastructure and viability.		
Sport England	Sport England does not wish to raise any issues with regard to the Draft Charging Schedule.	Response noted.	n/a
West Haddon Parish Council	<ul style="list-style-type: none"> IT should be included. Broadband & mobile access in rural areas is an issue. Business location and hence localised employment opportunities are being severely impacted currently by IT. BT has local monopoly. 	There are certain restrictions to projects which could be identified for funding through CIL. Due to State Aid rules, the Partner Councils are unable to provide significant funding to private, profit generating, companies.	n/a
Wildlife Trust	<ul style="list-style-type: none"> Importance of Biodiversity. It is disappointing to see that wider partners have been involved in helping compiling this list. 	Response noted. The Partner Councils and Joint Planning Unit are actively engaged with green infrastructure sponsors and developers to identify projects. The R123 list, now available for consultation, provides flexibility to identify projects throughout the plan period.	Draft R123 List prepared for next consultation.
WNDC	<ul style="list-style-type: none"> WNDC thinks that these should be on the R123 list. <p><u>Utilities:</u></p> <ul style="list-style-type: none"> In the Infrastructure Delivery Plan utility projects make up 5 of the 12 key infrastructure projects. The key infrastructure projects are considered 	<p>Utilities</p> <p>Funding for Utilities projects is identified from service providers and developers will be expected to procure site specific service provisions directly with each utility company.</p> <p>Transport</p>	<p>Draft R123 List prepared for next consultation.</p> <p>Continuation of collaboration with service providers.</p>

Respondent	Comment	Partner Council Response	Action
	<p>to be significant to all of West Northamptonshire. There is also utilities infrastructure cost of £116m.</p> <p><u>Transport:</u></p> <ul style="list-style-type: none"> In the infrastructure Delivery Plan transport projects make up 4 of the 12 key infrastructure projects. The key infrastructure projects are considered to be significant to all of West Northamptonshire. There is a known transport infrastructure cost of £270.5 m. There is also a substantial funding gap for transport which is estimates at £184.1m across West Northamptonshire. <p><u>Green Infrastructure:</u></p> <ul style="list-style-type: none"> Linked-up green space throughout West Northamptonshire. There is a funding gap across all three local authorities to provide for green infrastructure. <p><u>Education</u></p> <ul style="list-style-type: none"> Education is worth considering as a type of infrastructure to be considered on under the 123 list because although primary education is localised and can be contributed to within S106, 	<p>Transport projects form the largest section of the IDP. The Partner Councils will work with the local Highways Authority and Highways Agency to prioritise funding and promote schemes for external funding throughout the plan period and beyond.</p> <p>Green Infrastructure The Partner Councils and Joint Planning Unit are actively engaged with green infrastructure sponsors and developers to identify projects. The R123 list, now available for consultation, provides flexibility to identify projects throughout the plan period.</p> <p>Education Noted. Some service providers consider that their service area might best be delivered via site specific s106 agreements. The R123 list reflects the discussions we have had with service providers.</p>	

Respondent	Comment	Partner Council Response	Action
	secondary education could be considered as this is less localised.		
Question 11			
Do you have a view on how the District/Borough Councils should coordinate and work with other infrastructure providers to ensure the delivery of infrastructure projects funded by CIL?			
Aynho Parish Council	Don't just focus on the impacts of developments within the West Northamptonshire area. Where a village abuts the eco system of a neighbourhood council these infrastructure plans must also take account of the Development Plans of that neighbouring authority and the impact that those plans will have in villages lying within the West Northamptonshire area.	Service providers work closely to identify cross boundary issues and many agencies have their own strategic infrastructure plans. The draft R123 list, now available for consultation, provides scope for different schemes to be identified throughout the plan period.	Draft R123 List prepared for next consultation.
Boughton Parish Council	CIL must strike a balance within communities.	See Question 10 Response.	-
Deanshanger Parish Council	Money should be spent on community amenities.	The draft R123 list, now available for consultation, provides scope for different schemes to be identified throughout the plan period. It is recognised that some community facilities will be provided directly via s106 agreements. The operation of CIL will require a percentage to be provided directly to Parish Councils.	Draft R123 List prepared for next consultation.
HBF Consortium	Regs 123 List is very important.	Response noted.	n/a

Respondent	Comment	Partner Council Response	Action
Highways Agency	The task of developing a forward infrastructure programme with diverse infrastructure and an uncertain funding stream will represent a significant challenge for the authorities.	Response noted.	n/a
Kimbell Trust	Infrastructure that crosses boundaries.	Service providers work closely to identify cross boundary issues and many agencies have their own strategic infrastructure plans. The draft R123 list, now available for consultation, provides scope for different schemes to be identified throughout the plan period.	Draft R123 List prepared for next consultation.
Kleinwort Benson as Trustees of the Muriel Jackson-Stops Settlement	Set up a working group.	Response noted. The Partner Councils are currently considering options for the future Governance of CIL.	Continuation of development of internal processes and procedures for the governance of CIL.
Litchborough Parish Council	Did not feel competent to challenge any of the figures or assumptions presented.	Response noted.	n/a
Moulton Parish Council	Consult with, and give adequate consideration to local views, parish councils in particular.	Noted – there will be a further chance to comment when the Draft Charging Schedule is consulted on.	Partner Councils to provide support and assistance as required to Parish Councils.

Respondent	Comment	Partner Council Response	Action
NHS Properties	NHS would welcome regular liaison through infrastructure delivery meetings and if the JPU circulated regular reports on how CIL monies are being spent.	Response noted. The Partner Councils and Joint Planning Unit are actively engaged with healthcare providers to identify projects.	Continuation of collaboration with healthcare providers.
Northamptonshire County Council – Highways, Transport and Infrastructure	Unclear how CIL will be spent when it comes to the provision of infrastructure.	Response noted. The Partner Councils are currently considering options for the future Governance of CIL.	Continuation of development of internal processes and procedures for the governance of CIL.
Northamptonshire County Council Planning and Policy	It is unclear what the administration and governance arrangements of CIL.	Response noted. The Partner Councils are currently considering options for the future Governance of CIL.	Continuation of development of internal processes and procedures for the governance of CIL.
Pegasus Group Ltd	Ensure CIL payments fund projects outlined in the IDP.	The IDP provides a list of key infrastructure projects required to deliver the growth outlined within the Joint Core Strategy. The prioritisation of funds will be considered further as the Partner Councils consider options for the future Governance of CIL.	Draft R123 List prepared for next consultation. Continuation of development of internal processes and procedures for the governance of CIL.

Respondent	Comment	Partner Council Response	Action
Portfutures and UKSL	We consider that progress with the CIL should be postponed until the JPU has progressed further work with the local plan SA/SEA and housing needs assessment work that has to be carried out or alternatively that, given the current debate at the local plan EIP over infrastructure and viability.	Response noted.	n/a
Sport England	<ul style="list-style-type: none"> • I can advise Sport England does not wish to raise any issues with regard to the draft charging schedule. We are however concerned that the infrastructure delivery plan may be based on evidence that is out of date or indeed not available. • Sport England contends that evidence which is in excess of three years old without significant review could be considered out of date and therefore not robust. I can also advise that I understand Northampton Borough Council are considering plans for Leisure centre redevelopment along with the Trust. I am unsure of the funding package and if therefore the facility should be included in the IDP. 	Response noted. Some service providers consider that their service area might best be delivered via site specific s106 agreements. The R123 list reflects the discussions we have had with service providers.	Draft R123 List prepared for next consultation.

Respondent	Comment	Partner Council Response	Action
West Haddon Parish Council	Do they have any capacity to coordinate? I don't see much. Certainly not with NCC or Parish Councils.	Response noted.	Partner Councils to provide support and assistance as required to Parish Councils.
Wildlife Trust	Wildlife Trust would like to emphasize the multiple benefits that the natural environment provides such as to health and wellbeing, the economy and wider ecosystem services.	Response noted. The Partner Councils and Joint Planning Unit are actively engaged with green infrastructure sponsors and developers to identify projects.	Draft R123 List prepared for next consultation. Continuation of collaboration with service providers.
WNDC	Four of Northampton's SUE's overlap into neighbouring authorities. There should be an opportunity for infrastructure providers such as NNC, Highways Agency, Environment Agency, Anglian Water and energy suppliers to have a collaborative approach to delivering infrastructure requirements. This would allow for funding to be coordinated in a way that could assist with delivering infrastructure for the Regs123 list.	Response noted. The Partner Councils are currently considering options for the future Governance of CIL. This includes the ongoing work to identify specific projects and the collaborative work required to deliver the SUEs.	Continuation of development of internal processes and procedures for the governance of CIL.

