

1. It is difficult to comment on whether the proposed rates are appropriate given that NSC has little strategy for anything. If NSC had at least transport and leisure strategies linked to their site allocations plan then a reasonable judgement could be made on the rates proposed.
2. The existing Section 106 system is to be maintained, although NSC states it “will be scaled back to ensure that CIL is the key mechanism”. As the TC is only too aware this will result in additional costs to developments. So CIL is clearly a means to generate additional income to make up the loss of Central Government funding.
3. Are there any limits as to what CIL income can be used for?
4. Para 5.iv refers to assessing the cost of the total cost of infrastructure. Will NSC develop a plan so that this may be achieved?
5. The current infrastructure gap shows £497.7m still to be secured for Transport. What does this include?
6. Are the lower rates for Weston really justified or is this a further demonstration of the north of the district funding Weston. Surely the majority of development is in Weston and therefore will generate the most income.

In response to the questions:-

Q1 - Not a question we can answer. Developers will wish to reduce the rates whilst it is in the Parishes interest to raise them. Means to adjust in due course - preferably by an independent body - should be provided to reflect if the rates are having an impact on developments. If insufficient houses are being built to meet the 2026 target this might indicate rates are too high.

Q2 - I disagree with the proposal not to include a phasing policy. By excluding a phasing policy it is possible that some developers will be excluded from investing in the area if they are unable to front fund the CIL charge.

Q3 - I agree that that discretionary charitable relief should not be introduced.

Q4 - Exceptional circumstances relief should be included. This links to my comments under Q2.

Q5 - I do not think NSC have a clear understanding of the infrastructure requirements for the district.

Q6 - To be able to respond to this question I would need to know what NSC's logic is for splitting the Draft Regulation 123 and section 106 allowances is. So my response is there is insufficient information to assess whether the balance is correct.

Given our experience with NSC, and that of the other towns, do we trust NSC to apply the CIL equitably and fairly?