

Stinsford Parish Council

Minutes of the Annual Parish Council Meeting held on Tuesday 9 May 2023 at 7.28pm in The Old Library, Kingston Maurward College

Present: Mr George Armstrong (Chair), Mr Michael Clarke (Vice-Chair) and Mrs Sarah Pattison

Also in attendance: Miss Kirsty Riglar (Clerk)

36. Election of Chair

36.1 **Resolved** (unanimously) that, there being no other nominations, Mr George Armstrong be elected Chair for the year 2023/24. The Declaration of Acceptance of Office was signed and Mr Armstrong took the Chair.

36.2 On behalf of the Parish Council, Mr Armstrong thanked the outgoing Chair, Mrs Pattison, for her considerable contribution over the past year.

37. Appointment of Vice-Chair

37.1 **Resolved** (unanimously) that, there being no other nominations, Mr Michael Clarke be appointed Vice-Chair for the year 2023/24 and the Declaration of Acceptance of Office was signed.

38. Apologies for Absence

38.1 Apologies for absence were received from Ms Sue Escott.

39. Declarations of Interest

39.1 There were no declarations of disclosable pecuniary or other interest.

40. Public participation time

40.1 There being no members of the public present, the Chair moved to the next item.

41. Minutes

41.1 It was **resolved** that the minutes of the meeting held on 20 March 2023 be confirmed and signed by the Chair as a true record.

41.2 Further to minute 30.2, the Clerk reported that the issues raised in respect of Stinsford Bridge had been inspected by Dorset Council and the status of the issue had been changed to 'project work'. An update would be sought ahead of the next meeting.

41.3 Further to minute 32, the Parish Council noted the success of the Coronation celebrations organised by St Michael's Church.

41.4 Further to minute 25.1, the Chair confirmed that she had provided an update to local residents following the meeting with the Principal of Kingston Maurward College. It was also noted that the car park area on Church Lane had been tidied.

42. Accounts

42.1 The Clerk, as Responsible Financial Officer, presented the final accounts for the financial year 2022/23 for approval by the Parish Council. It was **resolved** that the accounts be approved.

43. Preparation for Audit

43.1 The Parish Council considered a number of documents prepared by the Clerk, as Responsible Financial Officer, in readiness for the annual audit of the financial year 2022/23.

43.2 It was **resolved** that:

- (i) the Council's risk assessment document be approved for consideration by the internal auditor;
- (ii) the Council's Asset Register be approved;
- (iii) the Internal Controls be noted; and
- (iv) Paula Harding of Barker Fox Associates be appointed as internal auditor for the year 2022/23.

44. Finance

44.1 Expenditure

The following payments were **resolved**:

- BHIB Councils Insurance – insurance renewal for 2023/24 (year 3 of 3-year long term agreement) - £392.05
- Dorset Association of Parish and Town Councils – annual subscription 2023/24 - £144.71
- Charminster and Charlton Down and Stinsford Community Publications Ltd - Contribution to The Pilot parish magazine for 2023/24 - £250.00
- HMRC (PAYE) (Quarter 4 2022/23) – £158.40
- Clerk's salary and expenses (Quarter 4 2022/23) - £514.20

45. Planning Matters

45.1 P/FUL/2023/01317 – Lower Bockhampton Farm, Bockhampton Lane, Lower Bockhampton DT2 8PZ – Convert former dairy parlour to 1 No. dwelling, including the demolition and rebuilding of eastern section of building. Erect car port / store.

It was **resolved** to support this application but to echo the request made by the Ramblers Association in its submission that the public footpath be kept open and accessible throughout the development process (should the application be approved).

45.2 P/FUL/2023/02040 – Yellowham Barn, Yellowham Wood, Troytown DT2 8FA – Change of use of agricultural land to use as yard area for existing agricultural machinery dealership. Formation of vehicular access and carry out associated works.

It was **resolved** to submit the following comment:

That before a decision is made, an ecological assessment and detailed assessment of the size and volumes of transport serving the site should be completed. If the application is approved, lighting on the site should be designed having regard to Policy SNP4 – Dark Skies in the adopted Stinsford Neighbourhood Plan.

46. North of Dorchester Garden Community

46.1 The Parish Council reflected upon the public meeting organised by STAND about the North of Dorchester Garden Community proposals, particularly the comments made by Wessex Water. It was proposed to invite a representative of Wessex Water to a future meeting of the Parish Council in order to hear more about this.

46.2 The Chair confirmed that he was content to link into STAND on this issue during 2023/24.

47. Consultations

47.1 The Parish Council **resolved** to submit corporate responses (set out in the Appendices to these minutes) to the following consultations:

- (i) Dorset Council – planning for climate change guidance documents;
- (ii) Dorset Council – Leisure Strategy;
- (iii) Department of Levelling Up, Housing and Communities – Environmental Outcomes Reports: a new approach to environmental assessment; and
- (iv) Department of Levelling UP, Housing and Communities – New Infrastructure Levy.

48. Climate and Ecological Emergency Strategy

48.1 Mrs Pattison provided an update on the planning for the parish boundary walk project on Sunday 18 June.

49. Maintenance of Parish Council Assets

49.1 Lower Bockhampton Play Area wall – Mr Armstrong reported that work was now underway on the wall. However, it had come to light that the condition of the wall was worse than initially thought:

- (i) the lime used for the capping stones had no hydraulic qualities and therefore the bricks in the centre were wet and some beyond reclamation;
- (ii) several different grades of cement mortar had been used in previous repairs and required more excavation work than previously estimated;
- (iii) several of the stone faces were very weather-damaged and would need to be replaced.

Whilst this work would still come in close to the estimate of £5,800, it was proposed to continue into the second section so as to ensure the integrity of the wall but also as an efficiency as the equipment and resources were currently on site.

49.2 It was **resolved** to:

- (i) continue the work into the second section of the wall and meet the cost of both sections in the current financial year; and
- (ii) make an initial payment for the first stage of the works upon receipt of the invoice.

49.3 Lower Bockhampton telephone box – Mr Armstrong reported that he had finally found a contractor who offered mobile sandblasting but a full quote had not yet been received. He also informed that Parish Council that a decorating contractor used by one of the residents in Lower Bockhampton had previously refurbished a similar telephone box and had quoted in the region of £500-550. It was **resolved** to investigate both quotes further in order that a final decision could be made.

50. Road Safety and Traffic Management

50.1 The Clerk provided an update on the potential installation of a grit bin at the junction of Cuckoo Lane and Higher Bockhampton. She was currently seeking an updated price from the Senior Estimator in Dorset Highways as the costs would have increased since the initial quote. Pending the final costs, it was **resolved** to position of a grit bin on the corner opposite the white fingerpost.

51. Correspondence

51. No items of correspondence were raised under this item.

52. Items for next/future Agenda

- 52.1 (i) Approval of the Annual Governance and Accountability Return.
(ii) Possible briefing from Wessex Water.

53. Date of next meeting

- 53.1 It was noted that the next reserve meeting was scheduled to take place on Monday 12 June 2023 but it would be necessary to meet in order to sign the Annual Governance and Accountability Return.
- 53.2 It was also noted that it was unlikely that the meeting in July would be quorate so this would be considered to be a reserve meeting.

The meeting concluded at 9:00pm.

Chair..... **Date**.....

Appendices to minutes of meeting held on 9 May 2023

Responses to submitted by Stinsford Parish Council to the following consultations:

1. Dorset Council – Planning for climate change guidance documents

Dorset Council Planning for Climate Change - Interim Guidance and Position Statement Section 1: Introduction and Overarching Policy Context

Do you have any comments regarding the introduction and overarching policy context?
Comments (please indicate the relevant paragraph number(s) you are commenting on)

No

Section 2: Sustainable Design and Construction

Do you agree with Position Statement 1 - Sustainable Design and Construction?

Yes

Do you have any comments regarding Position Statement 1?
Comments (please indicate the relevant paragraph number(s) you are commenting on)

This document needs to do more to acknowledge Neighbourhood Plans and to give particular attention to those cases where town and parish councils have adopted Climate and Ecological Emergency Strategies on the basis of their Neighbourhood Plan. It needs to specify clearly where such strategies will sit within the policies and procedures addressed by the consultation document.

The consultation document provides a very good summary of national policy.

However it is difficult to see how paragraphs 1.1.11 and 1.1.12 have been applied by Dorset Council in its continued promotion of draft Local Plan policy DOR13. This suggests that the principle is not 'well established and embedded in policy and decision making' as stated in paragraph 1.1.3.

Paragraph 1.1.15 calls for new buildings to be net zero. This is to be supported.

The line 'clear objective to boost development of renewable generation' is too broad and simplistic. This cannot be supported without further clarification.

Section 3: Renewable energy

Do you agree with Position Statement 2 - Renewable Energy Development?

No

Do you have any comments regarding Position Statement 2? Comments (please indicate the relevant paragraph number(s) you are commenting on)

This section provides a positive contribution although it is unclear how some of the preferred options in the Draft Dorset Local Plan will achieve this.

Paragraph 3.2.12 requires clarification about the geography involved in substantiation what constitutes 'community backing'. This is also unclear in the NPPF and may require legal interpretation.

There is a need to consider the viability of industrial scale developments outside of the AONBs from within the AONBs.

Some of the AONB boundaries are very dated. If AONBs are to have a significant role in influencing planning decisions then the AONB boundaries need to be positively reviewed. In the case of Stinsford Parish Council's administrative boundary, the AONB boundary needs to be brought south to include much of the parish. Large scale renewable technologies can have negative implications for the local economy. This can have particularly severe implications where an economy is tourism based.

National Design Guidance allows for access to green spaces. This can be inhibited by industrial scale renewables.

Paragraph 3.2.12 refers to the requirement for community backing for large scale renewable developments. NPPF is unclear about the geographic scope that 'community' should involve. It is often the case that wider geographies will be used as evidence of support to override the concerns of those directly impacted by a development.

Appendices Dorset Council Interim Guidance Note - Sustainability statement and checklist for planning applications Introduction and guidance The Sustainability Checklist Glossary

Do you agree with the introduction of a sustainability checklist to support the requirement for applicants to provide a sustainability statement?

Yes

What do you think about the content of the checklist?

The checklist should cover something else

Please provide any further comments on the content of the checklist:

The checklist should also cover light pollution and access to green space.

Do you have any comments regarding the Sustainability Checklist and guidance?
Comments (please indicate the relevant section(s) you are commenting on)

Generally the approach is useful and welcomed.

Changes to Paragraph 39 of the Dorset National and Local List of Requirements: Sustainability checklist and statement We are asking for your comments regarding the proposed changes to Paragraph 39 of the Dorset Council Local List: Sustainability checklist and statement
Do you agree with including the sustainability checklist alongside the sustainability statement in the Local List?

Yes

Do you have any comments on the types of development a sustainability checklist would be required for? Comments:

It should also cover buildings associated with renewable energy infrastructure.

Listed Buildings – what you can do for climate change Introduction Guidance on what can be done for energy efficiency

Is the quick reference table at section 3.3 clear and easy to use?

Yes

Case studies Are you aware of any other examples that could be added as case studies? Please describe the location and measures of any other examples:

There are many examples of small scale domestic properties across Dorset which could be used as case studies but it would not be appropriate to provide examples without the owners' consent.

Do you find the case studies helpful in demonstrating examples of what measures can be used?

Yes

Further information and relevant legislation Is there anything else you would like guidance on (relating to listed buildings and climate change) that you think is missing from this document?

Yes

If you answered yes, please provide further information here:

It is important that collective systems for neighbourhoods or villages where listed buildings are included as part of a group of buildings are included within the guidance as this occurs a lot across Dorset. Similarly, small scale residential examples and guidance is required.

2. Dorset Council – Leisure Strategy

How many residents are in your parish/town?

320 approximately

Can residents in your parish/town easily get to places to play sports, take part in fitness, and other facilities to be active?

No

Could it be easier for residents to get to these places?

Yes

Are there specific sections of the population in your parish/town you believe that targeted physical activity, leisure and/or sport services and/or facilities, spaces and places would benefit? By “sections” we mean age, gender, ethnic groups etc.

This would require a full Equality Impact Assessment.

If yes to the previous question would you say these sections of population are geographical or demographic?

As for previous question.

Using your local knowledge what do you think are the likely/potential barriers that prevent people in your parish/town from taking part in physical activity, leisure and/or sport?

There is no access to public transport in the parish. There is also a lack of facilities in the nearest town, Dorchester. Residents do have access to walk the rights of way network and Thorncombe Woods, although this is not an option to residents north and west of the A35 because it acts as a barrier.

What do you think would encourage residents to be more active using local leisure centres, outdoor play areas, parks or beaches?

There is a need for comfortable, affordable, regular and reliable public transport into Dorchester to access parks and further afield to beaches. The parish does have a small children's play area.

Are there any facilities (both indoor and outdoor) that you believe your parish/town would benefit from that would increase participation in physical activity?

The parish would benefit from:

- (a) a parish or community hall and adjacent outdoors sports / recreational field.
- (b) footpath infrastructure bridging the A35.
- (c) public transport options.

Do you have marked walking routes in your parish/town?

Yes but some routes are blocked by farming activities and inadequate signage to the north and west of the A35.

Do you have marked cycling routes in your parish/town?

No.

3. DLUHC – Environmental Outcomes Reports: a new approach to environmental assessment

Q.1. Do you support the principles that will guide the development of outcomes? [Yes / No].	Yes
Q.2. Do you support the principles that indicators will have to meet? [Yes / No].	Yes
Q.3. Are there any other criteria we should consider?	There is a need to identify an interface with the work of town and parish councils. It also needs to take account of cumulative impacts.
Q.4. Would you welcome proportionate reporting against all outcomes as the default position? [Yes/ No].	Yes
Q.5. Would proportionate reporting be effective in reducing bureaucratic process, or could this simply result in more documentation?	It is essential to obtain appropriate results even if it is a more drawn out process to achieve this.
Q.6. Given the issues set out above, and our desire to consider issues where they are most effectively addressed, how can government ensure that EORs support our efforts to adapt to the effects of climate change across all regimes?	EOR's should also look at the impacts of green technologies and particularly at carbon offset schemes.
Q.7. Do you consider there is value in clarifying requirements regarding the consideration of reasonable alternatives?	Once environmental and habitat damage is done it is difficult and sometimes impossible to undo the damage. Mitigation must be seen as an absolute last option if at all. The notion of off set can cause considerable damage elsewhere and driland values besides justifying irreversible damage to an initial locality resulting from development.
Q.8. How can the government ensure that the consideration of alternatives is built into the early design stages of the	A clear hierarchy of alternative options should be provided along with guidance that there will be a position tilted against permitting development that may have significant environmental impacts. The proposals offer too much scope

development and design process?	for consultants with a vested interest in pursuing outcomes that will satisfy the interests of those who have employed their services. In the proposals mitigation is specified as a clear option rather than it been seen as an option that is unlikely to be acceptable. 'Levels of uncertainty' suggests that data may be less than clear. Where data is unclear or inconclusive a cautious position should be taken and development declined. Reports need to be fully available to the public in an accessible format without any approach to conceal them behind commercial confidentiality, GDPR or any other approach. Outcomes need to be verified by genuinely independent experts.
Q.9. Do you support the principle of strengthening the screening process to minimise ambiguity?	Yes. Screening should save unnecessary work and time by providing extra clarity and highlighting potential issues early in the process.
Q.10. Do you consider that proximity or impact pathway to a sensitive area or a protected species could be a better starting point for determining whether a plan or project might require an environmental assessment under Category 2 than simple size thresholds? [Yes/No].	Yes.
Q.11. If yes, how could this work in practice? What sort of initial information would be required?	An EOR should be carried out in all circumstances except small scale domestic applications. Extensive habitat and biodiversity data should be maintained by local authorities.
Q.12. How can we address issues of ineffective mitigation?	Mitigation is never a desirable option because it is always set against environmental damage.
Q.13. Is an adaptive approach a good way of dealing with uncertainty?	No.
Q.14. Could it work in practice? What would be the challenges in implementation?	Compatible data to objectively determine what has been lost on one site and replicated elsewhere through mitigation is difficult to compile. Even if possible it would require a long term commitment by developers to carrying out monitoring and remedial action. This may be impractical.
Q.15. Would you support a more formal and robust approach to monitoring? [Yes/No]. Q.16. How	Yes.

can the government use monitoring to incentivise better assessment practice	
Q.16. How can the government use monitoring to incentivise better assessment practice	The threat of serious legal sanctions may be required to ensure that monitoring is maintained and that the results are accessible to the public. This will require penalties if remedial action is not taken. Local; authorities could collect monies in advance of development and hold it in a deposit scheme to ensure that developers maintain ongoing commitment to the site.
Q.17. How can the government best ensure the ongoing costs of monitoring are met?	Money could be taken upfront from development interests. The period covered by the fund should allow for the inclusion of an amount to cover predicted inflationary predictions. Holding the fund could cover several years in accordance with site specific requirements.
Q.18. How should the government address issues such as post-decision costs and liabilities?	Liabilities and post decision costs should remain with the developer.
Q.19. Do you support the principle of environmental data being made publicly available for future use?	All data should be handed on to local authorities and made publicly available free of charge on request.
Q.20. What are the current barriers to sharing data more easily?	Issues around commercial confidentiality and copyright. All data should be produced with a clause enabling its reuse for for public and community environmental purposes.
Q.21. What data would you prioritise for the creation of standards to support environmental assessment?	Ecological and habitat data needs to be consistent. Data should be longitudinal and consider cumulative impacts.
Q.22. Would you support reporting on the performance of a plan or project against the achievement of outcomes? [Yes/ No].	Yes.
Q.23. What are the opportunities and challenges in reporting on the achievement of outcomes?	This would allow for the compilation of more accurate and long term data. As a parish council one of the difficulties we face is obtaining reliable data for the Parish Climate and

	Ecological Emergency Strategy. Accessible monitoring data could in part assist with this.
<p>Question 24: Once regulations are laid, what length of transition do you consider is appropriate for your regime?</p> <p>i) 6 months</p> <p>ii) 1 year</p> <p>iii) 2 years</p> <p>Please state regime.</p>	As a parish council we are not a planning authority.
<p>Question 25: What new skills or additional support would be required to support the implementation of Environmental Outcomes Reports?</p>	Local authorities will require serious funding to employ and maintain the technical expertise necessary.
<p>Question 26: The government would be grateful for your comments on any impacts of the proposals in this document and how they might impact on eliminating discrimination, advancing equality and fostering good relations</p>	This proposal requires a full equality impact assessment. This should be done in accordance with the protected groups in the Equality Act (2010) prior to any potential revision of the Act.

4. DLUHC – New Infrastructure Levy

<p>Question 1: Do you agree that the existing CIL definition of ‘development’ should be maintained under the Infrastructure Levy, with the following excluded from the definition:</p> <ul style="list-style-type: none"> • developments of less than 100 square metres (unless this consists of one or more dwellings and does not meet the self-build criteria) – Yes/No/Unsure • Buildings which people do not normally go into - Yes/No/Unsure • Buildings into which peoples go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery - Yes/No/Unsure • Structures which are not buildings, such as pylons and wind turbines. Yes/No/Unsure <p>Please provide a free text response to explain your answer where necessary.</p>	<p>Object – ‘Buildings in which people only go intentionally for the purpose of inspecting or maintaining fixed plant or machinery’. And ‘structures which are not buildings such as pylons and wind turbines’. Communities need to gain benefits from the loss of amenity and impacts on infrastructure from industrial scale renewables.</p>
<p>Question 2: Do you agree that developers should continue to provide certain kinds of infrastructure, including infrastructure that is incorporated into the design of the site, outside of the Infrastructure Levy? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.</p>	<p>Yes – developers should be required to develop liveable places with adequate infrastructure to meet the needs of all members of the community. Developers should be required to compensate for the negative impacts of development on existing residents. Care should be taken to prevent developers identifying environmentally undeliverable sites as green infrastructure or biodiversity enhancement. This should be about the development of new provision rather than incorporating existing sites that are too expensive, difficult or environmentally sensitive into development schemes.</p>
<p>Question 3: What should be the approach for setting the distinction between ‘integral’ and ‘Levy-funded’ infrastructure? [see para 1.28 for options a), b), or c) or a combination of these]. Please provide a free text response to explain your answer, using case study examples if possible</p>	<p>Integral infrastructure needs to be determined on a case by case basis with parish and town council input.</p>
<p>Question 4: Do you agree that local authorities should have the flexibility to use some of their Levy funding for non-infrastructure items such as service provision? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary</p>	<p>Yes as long as all on site needs site met by the levy</p>

<p>Question 5: Should local authorities be expected to prioritise infrastructure and affordable housing needs before using the Levy to pay for non-infrastructure items such as local services? [Yes/No/Unsure]. Should expectations be set through regulations or policy? Please provide a free text response to explain your answer where necessary.</p>	<p>Priority should be given to infrastructure. Affordable housing should be prioritised where it can be shown to be genuinely affordable – i.e. municipal housing.</p>
<p>Question 6: Are there other non-infrastructure items not mentioned in this document that this element of the Levy funds could be spent on? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary</p>	<p>Arts and leisure infrastructure, community halls etc all add to the quality of life and sense of community. Community infrastructure both in and outside of new developments is important. All too often development takes no or little account of existing road and infrastructure impacts across wider areas.</p>
<p>Question 7: Do you have a favoured approach for setting the 'infrastructure in-kind' threshold? [high threshold/medium threshold/low threshold/local authority discretion/none of the above]. Please provide a free text response to explain your answer, using case study examples if possible.</p>	<p>The proposals are too large. Account of cumulative impacts of development is important. Several small developments may amount to the same infrastructure requirements of a large development without any levy raised if it is not applied to small developments.</p>
<p>Question 8: Is there anything else you feel the government should consider in defining the use of s106 within the three route ways, including the role of delivery agreements to secure matters that cannot be secured via a planning condition? Please provide a free text response to explain your answer.</p>	<p>It is disappointing that this does not open up environmental and habitat requirements as a distinct stream alongside affordable housing.</p>
<p>Question 9: Do you agree that the Levy should capture value uplift associated with permitted development rights that create new dwellings? [Yes/No/Unsure]. Are there some types of permitted development where no Levy should be charged? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.</p>	<p>Yes. The idea of a 'replacement rate' could be an issue. Very often developers find it more viable to replace than regenerate buildings. Demolition and the destruction of existing structures often has serious environmental impacts. A lower replacement rate also encourages bids to replace rather than restore heritage assets.</p>
<p>Question 10: Do you have views on the proposal to bring schemes brought forward through permitted development rights within scope of the Levy? Do you have views on an appropriate value threshold for qualifying permitted development? Do you have views on an</p>	<p>Small domestic applications within the permitted development should be left out of the scheme where they have no impact on existing infrastructure or facilities.</p>

appropriate Levy rate 'ceiling' for such sites, and how that might be decided?	
<p>Question 11: Is there is a case for additional offsets from the Levy, beyond those identified in the paragraphs above to facilitate marginal brownfield development coming forward? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary, using case studies if possible.</p>	Unsure. It still amounts to on site development for potential economic gain. The public should not be expected to pay to clean up and prepare brown field sites for development.
<p>Question 12: The government wants the Infrastructure Levy to collect more than the existing system, whilst minimising the impact on viability. How strongly do you agree that the following components of Levy design will help achieve these aims?</p> <ul style="list-style-type: none"> • Charging the Levy on final sale GDV of a scheme [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] • The use of different Levy rates and minimum thresholds on different development uses and typologies [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] • Ability for local authorities to set 'stepped' Levy rates [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] • Separate Levy rates for thresholds for existing floorspace that is subject to change of use, and floorspace that is demolished and replaced [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] 	<p>1) Agree 2) Disagree 3) Unsure 4) Strongly disagree</p>
<p>Question 13: Please provide a free text response to explain your answers above where necessary</p>	<p>A levy should be on the final sale GDV of a scheme although this should also take account of land value rises resulting from site allocations. Allowing for different uses may encourage developers to look to justify lower contributions by resubmitting change of use applications late in the process etc. Local authority stepped level rates may encourage development to come forward to meet minimum requirements rather than the range of development that may be required. The implications for this need further exploration. Different thresholds for existing floorspace needs to consider the implications for heritage assets.</p>

<p>Question 14: Do you agree that the process outlined in Table 3 is an effective way of calculating and paying the Levy? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary.</p>	<p>No. It will allow for schemes to come forward and viability to be agreed afterwards. This removes viability as a material factor in site allocations and will remove viability as a relevant issue in community response to site allocations in the production of local plans. If the levy is agreed post development it could have negative consequences environment, habitat and heritage protection.</p>
<p>Question 15: Is there an alternative payment mechanism that would be more suitable for the Infrastructure Levy? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary</p>	<p>Yes. The levy should be based on a viability assessment before development and raised on completion if the site raises a higher return than forecast.</p>
<p>Question 16: Do you agree with the proposed application of a land charge at commencement of development and removal of a local land charge once the provisional Levy payment is made? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary</p>	<p>Yes. This will help to ensure payment of the levy.</p>
<p>Question 17: Will removal of the local land charge at the point the provisional Levy liability is paid prevent avoidance of Infrastructure Levy payments? [Strongly Agree/Agree/Neutral/Disagree/ Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary</p>	<p>Unsure. This needs to be strongly enforced.</p>
<p>Question 18: To what extent do you agree that a local authority should be able to require that payment of the Levy (or a proportion of the Levy liability) is made prior to site completion? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]. Please explain your answer.</p>	<p>Local authorities should be able to require payment of all or part of the levy prior to completion. This could be an important tool in ensuring infrastructure delivery.</p>
<p>Question 19: Are there circumstances when a local authority should be able to require an early payment of the Levy or a proportion of the Levy? Please provide a free text response to explain your where necessary</p>	<p>Early payment should be site specific based on what is essential to allow a site to progress.</p>
<p>Question 20: Do you agree that the proposed role for valuations of GDV is proportionate and necessary in the</p>	<p>A market economy is about taking risks. The levy should be charged regardless of market conditions.</p>

context of creating a Levy that is responsive to market conditions [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.	
Question 21: To what extent do you agree that the borrowing against Infrastructure Levy proceeds will be sufficient to ensure the timely delivery of infrastructure? [Strongly Agree/Agree/Neutral/ Disagree/Strongly Disagree/Unsure]. Please provide a free text response to explain your answer where necessary	Disagree. This may put local authorities at risk if the proceeds of the levy do not materialise or are amended on completion of a development.
Question 22: To what extent do you agree that the government should look to go further, and enable specified upfront payments for items of infrastructure to be a condition for the granting of planning permission? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.	Agree. Upfront payments for infrastructure should be part of granting planning permission.
Question 23: Are there other mechanisms for ensuring infrastructure is delivered in a timely fashion that the government should consider for the new Infrastructure Levy? [Yes/No/Unsure] Please provide free text response to explain your answer where necessary.	Yes. The government should consider serious sanctions against those who fail to deliver the infrastructure levy. Where ever possible payment should be in advance of and a condition of any planning permission.
Question 24: To what extent do you agree that the strategic spending plan included in the Infrastructure Delivery Strategy will provide transparency and certainty on how the Levy will be spent? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree] Please provide a free text response to explain your answer where necessary.	Disagree. Local authorities may not have the resources to allow for full transparency. The prime objective may be to adopt a strategy rather than allow for a potentially slower process that may be required by a requirement for transparency.
Question 25: In the context of a streamlined document, what information do you consider is required for a local authority to identify infrastructure needs?	A full evidenced approach is required using strategic housing land assessments and viability studies.

<p>Question 26: Do you agree that views of the local community should be integrated into the drafting of an Infrastructure Delivery Strategy? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary</p>	<p>Yes. The local community could be 'integrated' if this means engagement. It is crucial that decisions should take account of the views of town and parish councils in the locality. They offer the closest level of democratically elected government to their resident populations.</p>
<p>Question 27: Do you agree that a spending plan in the Infrastructure Delivery Strategy should include:</p> <ul style="list-style-type: none"> • Identification of general 'integral' infrastructure requirements • Identification of infrastructure/types of infrastructure that are to be funded by the Levy • Prioritisation of infrastructure and how the Levy will be spent • Approach to affordable housing including right to require proportion and tenure mix • Approach to any discretionary elements for the neighbourhood share • Proportion for administration • The anticipated borrowing that will be required to deliver infrastructure • Other – please explain your answer • All of the above 	<p>Yes but this should also work with needs identified through neighbourhood plans.</p>
<p>Question 28: How can we make sure that infrastructure providers such as county councils can effectively influence the identification of Levy priorities?</p> <ul style="list-style-type: none"> • Guidance to local authorities on which infrastructure providers need to be consulted, how to engage and when • Support to county councils on working collaboratively with the local authority as to what can be funded through the Levy • Use of other evidence documents when preparing the Infrastructure Delivery Strategy, such as Local Transport Plans and Local Education Strategies • Guidance to local authorities on prioritisation of funding • Implementation of statutory timescales for infrastructure providers to respond to local authority requests 	<p>The approach should provide regulation requiring councils to work with town and parish councils and communities. Significant sanctions should be included for failure to do this.</p>

• Other – please explain your answer	
Question 29: To what extent do you agree that it is possible to identify infrastructure requirements at the local plan stage? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.	Neutral. Infrastructure must be local but also consider the impacts of development of strategic infrastructure such as the wider road network etc.
Question 30: To what extent do you agree that the 'right to require' will reduce the risk that affordable housing contributions are negotiated down on viability grounds? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary	The right to require may lead to developers demanding greater amounts from local authorities through the 'grant pot model'. This requires greater clarification and exploration of all possible eventualities.
Question 31: To what extent do you agree that local authorities should charge a highly discounted/zero-rated Infrastructure Levy rate on high percentage/100% affordable housing schemes? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary	Disagree. Affordable housing is rarely affordable. It would therefore be wrong to charge a highly discounted or zero-rated infrastructure levy when affordable housing is still producing profits in the supply chain and in land value rises.
Question 32: How much infrastructure is normally delivered alongside registered provider-led schemes in the existing system? Please provide examples.	We are not a planning authority and therefore unable to provide examples.
Question 33: As per paragraph 5.13, do you think that an upper limit of where the 'right to require' could be set should be introduced by the government? [Yes/No/unsure] Alternatively, do you think where the 'right to require' is set should be left to the discretion of the local authority? [Yes/No/unsure]. Please provide a free text response to explain your answer where necessary.	Yes. The Government should not set an upper limit. All sites are site specific because of physical capacity, economic viability and local need.
Question 34: Are you content that the Neighbourhood Share should be retained	Yes but within the provisions of Chapter 6.

under the Infrastructure Levy? [Yes/No/Unsure?]	
<p>Question 35: In calculating the value of the Neighbourhood Share, do you think this should A) reflect the amount secured under CIL in parished areas (noting this will be a smaller proportion of total revenues), B) be higher than this equivalent amount C) be lower than this equivalent amount D) Other (please specify) or E) unsure. Please provide a free text response to explain your answer where necessary</p>	<p>The amount of the neighbourhood share should be based on local need as identified through Neighbourhood planning. Parish and Town Councils need a stronger input into the development of the 'Infrastructure Delivery Strategy' to ensure that delivery is targeted at identified requirements. Parish and Town Councils also require financial resources to create an evidence base appropriate to justifying the need for infrastructure allocations in the Infrastructure Delivery Plan because these may go beyond what is required by the neighbourhood plan.</p>
<p>Question 36: The government is interested in views on arrangements for spending the neighbourhood share in unparished areas. What other bodies do you think could be in receipt of a Neighbourhood Share in such areas?</p>	<p>No comment.</p>
<p>Question 37: Should the administrative portion for the new Levy A) reflect the 5% level which exists under CIL B) be higher than this equivalent amount, C) be lower than this equivalent amount D) Other (please specify) or E) unsure. Please provide a free text response to explain your answer where necessary</p>	<p>The administrative component of the levy needs to be higher than 5% in order that administrative costs may also be provided to Parish and Town Councils.</p>
<p>Question 38: Applicants can apply for mandatory or discretionary relief for social housing under CIL. Question 31 seeks views on exempting affordable housing from the Levy. This question seeks views on retaining other countryside exemptions. How strongly do you agree the following should be retained:</p> <ul style="list-style-type: none"> residential annexes and extensions; [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree] self-build housing; [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree] <p>If you strongly agree/agree, should there be any further criteria that are applied to these exemptions, for example in relation to the size of the development?</p>	<p>Agree with the exception that annexes and extensions rarely add to infrastructure requirements unless the annex functions as a separate residential unit. Strongly disagree that self build housing should be exempt. In the UK self build is very often the domain of affluent individuals. It rarely contributes to housing diversity but it does add to the demands on existing infrastructure.</p>

<p>Question 39: Do you consider there are other circumstances where relief from the Levy or reduced Levy rates should apply, such as for the provision of sustainable technologies? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.</p>	<p>No. Especially not for the provision of sustainable technologies. These can still raise infrastructure requirements. They are produced for profit and the public should not be funding them.</p>
<p>Question 40: To what extent do you agree with our proposed approach to small sites? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.</p>	<p>Disagree. Small sites still bring infrastructure requirements that need to be funded. A large number of small developments in a specific locality can rapidly equate to large scale development.</p>
<p>Question 41: What risks will this approach pose, if any, to SME housebuilders, or to the delivery of affordable housing in rural areas? Please provide a free text response using case study examples where appropriate.</p>	<p> Housebuilders in rural areas are more likely to benefit from greenfield sites with potentially higher returns. There is no justification in a reduced levy.</p>
<p>Question 42: Are there any other forms of infrastructure that should be exempted from the Levy through regulations?</p>	<p>All large infrastructure projects that involve the private sector should be subject to the levy.</p>
<p>Question 43: Do you agree that these enforcement mechanisms will be sufficient to secure Levy payments? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.</p>	<p>No. Enforcement is dependent on the strength of penalties. Taking account of the damage that can be inflicted by development on infrastructure if it is not updated the penalties need to be at a level that constitutes a realistic deterrent</p>
<p>Question 44: Do you agree that the proposed 'test and learn' approach to transitioning to the new Infrastructure Levy will help deliver an effective system? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary</p>	<p>Neutral.</p>
<p>Question 45: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?</p>	<p>The proposals need to be seriously assessed through a meaningful equality impact approach. Assessment should be against all protected characteristics and not just those included in any proposed revision of the Equality Act (2010).</p>

<p>[Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.</p>	
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