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Sent by email only to: planningpolicy@eastdevon.gov.uk

Dear Sir/Madam

Re: Community Infrastructure Levy – Draft Charging Schedule consultation

Thank you for the opportunity to comment on the draft CIL charging schedule consultation. This letter provides the County Council response in the context of statutory responsibilities for infrastructure provision, particularly education and transportation.

The County Council welcomes the zero rating of Cranbrook which should help to deliver essential infrastructure at the new community. The County Council also supports the zero rating of extra care housing as this is often an affordable housing product and developer contributions are usually required to make individual schemes viable.

As identified in the response to the consultation on the preliminary draft charging schedule, the County Council is of the view that all strategic allocations should be zero-rated. This would clarify that, going forward, s106 would be secured from these developments which would improve the certainty over infrastructure delivery.

More widely, the County Council has significant concerns over the delivery of education and transport infrastructure under the CIL regime as proposed in the draft charging schedule consultation document. Specifically, the list of infrastructure which the District Council considers will be funded through CIL, mixes 'types' of infrastructure and specific infrastructure 'projects'. This does not give sufficient clarity over which infrastructure projects will be funded by CIL and which will be funded using s106 contributions.

The County Council's view is that CIL should be used to fund *specific* education and transport projects which would be identified on the infrastructure list (eventually included in the annual infrastructure funding statement). Other education and transport projects would be funded by s106. This more nuanced approach to the

funding of infrastructure reflects the changes to the CIL regime which enables a more flexible way of combining CIL and s106.

It is acknowledged that this approach may require further viability work to be carried out, and possibly a revision of the proposed CIL charges, but this may be necessary if the required infrastructure is to be delivered in a timely manner.

To provide clarity on the County Council's position, the projects which are anticipated to require CIL funding (in whole or part) are:

- Exmouth Community College;
- 420 place primary school in the West End;
- Additional secondary capacity serving the West End;
- Additional primary capacity serving Axminster;

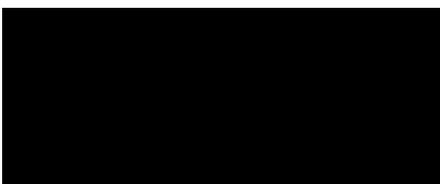
- Axminster relief road;
- Dinan Way;
- Clyst St Mary roundabout; and
- Clyst Valley Way.

In addition, it should be noted that the County Council has forward funded expansion projects at both Clyst St Mary Primary School and Honiton Primary School to ensure there are sufficient pupil places available when development comes forward. The County Council will require funding from development in order to appropriately recoup the proportional amount which has been forward funded.

The County Council also remains concerned about how funding from CIL will be allocated by the District Council and would like to understand how the process will operate in future. Given the infrastructure funding gap, the allocation of CIL funding should be on an agreed, priority basis over a five-year period. This would allow for better budgetary planning by the infrastructure providers and open up opportunities for drawing down money from alternative sources.

I suggest that we meet in the near future to discuss the above issues in order that we can agree a joint way forward. Beyond this, the County Council would like to attend the CIL Examination Hearings.

Yours faithfully,



Mike Deaton
Chief Planner