

## Comment

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<b>Company / Organisation</b>	Churchill Retirement Living Ltd
<b>Address</b>	Millstream House Parkside Ringwood BH24 3SG
<b>Event Name</b>	Community Infrastructure Levy Draft Charging Schedules
<b>Comment by</b>	Churchill Retirement Living Ltd (Mr Fred Address)
<b>Comment ID</b>	CIL-DCS1
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### **Question 1: Do you wish to be heard in support of your representations at the Public Examination of the Draft Charging Schedule?**

*Please note that the Inspector will decide if a public hearing session is required as part of the examination process. You may choose to request to appear at a public hearing to clarify your comments, but you must communicate this to the Council before the close of the consultation. If you do not wish to be heard at the examination, your written representations will carry the same weight as those made by respondents who appear and are heard in support of their representations.*

**Question 1: Do you wish to be heard in support of your representations at the Public Examination of the Draft Charging Schedule?** No

**Question 2: Do you agree or disagree with the proposed rates contained in the Draft Charging Schedule?**

**Question 2: Do you agree or disagree with the proposed rates contained in the Draft Charging Schedule?** Disagree

**Question 2**

*Please add any comments regarding Question 2 below.*

*Please note: Comments cannot be treated as confidential and therefore by responding, you are agreeing to your information being disclosed to third parties.*

**Question 2**

I repeat my response to the Preliminary Draft Charging Schedule consultation. The viability assessment did not satisfactorily test the viability of a specialist retirement (sheltered housing) scheme. This is evident by the fact that CIL charge of 40/m<sup>2</sup> is proposed for Care Homes (class use C2) and sheltered housing schemes are included in the residential catch all class use C3 at 100/m<sup>2</sup>. A separate rate for C3 sheltered housing schemes should be included or the description for the care home charge be extended to include sheltered housing schemes. An economic viability appraisal was submitted with the planning application for a sheltered housing scheme on previously developed land in Christchurch and Wimborne. In each case the viability appraisal was independently verified for the Council. The viability appraisals demonstrated that the proposed sheltered housing developments could not make the full S106 contribution and remain viable, The imposition of a CIL charge at 100/m<sup>2</sup> will have a serious adverse effect on the viability of such developments

**Question 3: Do you think that the proposed CIL rates strike an appropriate balance between the desirability of funding infrastructure through CIL and the potential effects of imposing a CIL on the Borough and District?**

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**Question 3: Do you think that the proposed CIL rates strike an appropriate balance between the desirability of funding infrastructure through CIL and the potential effects of imposing a CIL on the Borough and District?**

Yes generally, but not specifically in relation to sheltered housing developments

**Question 4: Do you believe the evidence on viability is correct? If not, please set out alternative evidence to support your view?**

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**Question 4: Do you believe the evidence on viability is correct? If not, please set out alternative evidence to support your view?**

No In June 2013, alternative evidence was submitted to each council in a joint briefing paper by Churchill retirement Living Ltd and McCarthy & Stone entitled "Retirement Housing and the Community Infrastructure Levy". Additional copies can be provided on request.

**Question 5: Do you agree or disagree with the Councils' approach to discretionary relief?**

**Question 5: Do you agree or disagree with the Councils' approach to discretionary relief?** Disagree

**Question 5**

Please add any comments regarding Question 5 below.

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**Question 5**

All forms of housing which comply with the NPPF's definition for affordable housing should qualify for discretionary relief. Para 2.12 (first bullet point) states that a dwelling which is sold for "no more" than 80% of it's market value does not qualify. Therefore a dwelling which is sold for 50% of market value would not qualify because 50% is no more than 80% which is surely not the intention. The wording should be changed to "The dwelling is sold for more than 80% of its market value...."

**Question 7: Do you agree or disagree with the draft CIL instalments policy?**

**Question 7: Do you agree or disagree with the draft CIL instalments policy?**      Agree

**Question 8: Do you agree or disagree with the draft ?payment in kind? policy?**

**Question 8: Do you agree or disagree with the draft ?payment in kind? policy?**      Agree

**Please indicate if you wish to be notified of any of the following**

- Please indicate if you wish to be notified of any of the following**
- . That the Draft Charging Schedules have been submitted to the examiner in accordance with Section 212 of the Planning Act 2008
  - . The publication of the recommendations of the examiner and the reasons for those recommendations
  - . The approval of the Charging Schedules by the charging authorities

*Data Protection (Please tick)*

**Data Protection**

Data Protection (Please tick)

**Data Protection**