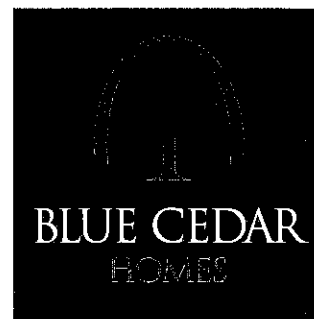


Our Ref: ST/SWDPCILRep

18 April 2016

South Worcestershire Development Plan Team
Civic Centre
Queen Elizabeth Drive
Persore
Worcestershire
WR10 1PT



Dear Sir or Madam

Re: Representations to South Worcestershire Development Plan – CIL Draft Charging Schedule Public Consultation

I refer to the South Worcestershire Development Plan CIL Draft Charging Schedule Public Consultation and wish to make a number of representations. These Submissions are made on behalf of Blue Cedar Homes, a private retirement homes specialist operating in the South West of England.

On 21 March 2015, the Government updated paragraph 021 of the National Planning Policy Guidance (NPPG) putting a greater emphasis on Councils making provision for the changing needs of older residents. Indeed, the guidance stresses that older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (use class C2). It states that *"The need to provide housing for older people is **critical**"* [my emphasis].

I note that within the CIL Draft Charging Schedule (April 2016) set out in Table 1 on page 19, the CIL rate for residential development in the main urban areas is £0 per m² in Malvern Hills, Worcester City and Wychavon. In addition, the CIL rate for residential development in all other areas is £0 per m² in Worcester City and Wychavon, but £40 per m² in Malvern Hills.

I strongly believe that a nil rate across the Authorities should also be applied to specialist accommodation such as retirement housing. Reference to **'C3 Sheltered/Retirement Houses'** should be explicitly added to the Charing Authority Proposed Levy Rate table (Table 1).

Viability testing in other Authorities in the South West demonstrates that sheltered retirement housing, which is classified as use class C3, is very challenging. It is my firm belief that applying CIL rates to retirement developments will be to constrain the delivery of schemes. I therefore hope that any adopted CIL Charging Schedule can be adapted in a way that does not constrain this much needed form of development.

Indeed, paragraph 018 of the NPPG supports this assertion, advising that *"For older people's housing, the specific format and projected sales rates may be a factor in assessing viability"*.

Our homes have many features which allow versatility as and when it is required or necessary. As such, I truly believe that a Blue Cedar home helps reduce the likelihood of needing to move into a residential home, due to frailty in later life. All of the properties benefit from estate maintenance – both communal and individual.

Factors such as higher build costs and a longer selling period for our properties make retirement housing less viable than new homes in general. Therefore, it is imperative that when determining CIL rates, the Charging Authorities complete an accurate development scenario for specialist accommodation for the elderly to ascertain whether it can support the same level.

I note that in the report on the Examination of the Draft Hertsmere Borough Council Community Infrastructure Levy Charging Schedule, December 2013 (PINS/N1920/429/12), developers of specialist retirement housing, McCarthy and Stone and Churchill Retirement Living, and Hertsmere Borough Council recognised the important difference between retirement housing and general needs housing in their charging schedule. The same approach should be considered and taken by South Worcestershire in its CIL Charging Schedule. Currently, I believe there is no reasonable justification for a CIL charge on retirement housing in any area of the Authority and, at the same level as general needs housing.

I believe that a housing scheme which provides a real need for specialist housing, such as retirement dwellings, should be exempt from CIL as well as affordable housing, similar to the C2 use class. Indeed, the Proposed Levy has a nil contribution for uses such as care homes (C2 use class).

Furthermore, it should also be recognised that by providing this type of housing for the elderly to downsize, larger family homes would become vacant. As a minimum, all forms of C3 retirement housing should be explicitly exempt from CIL.

I trust the above comments can be considered in the South Worcestershire Development Plan CIL Draft Charging Schedule Public Consultation. If you require any further information on the above, particularly relating to the retirement home operation, I would be more than happy to discuss this with you. Please will you keep me notified of developments throughout the preparation process?

Yours faithfully


Simon Tofts
Planning Manager

Email: 

E-mail address

In parallel with the South Worcestershire Development Plan (SWDP), the South Worcestershire Councils (Worcester City, Malvern Hills and Wychavon District Councils) are synchronising the process of preparing a Community Infrastructure Levy (CIL). Following consultation on the Preliminary Draft Charging Schedule (PDCS) in February/March 2015, work to update CIL has been carried out and each authority now intends to submit a **Draft Charging Schedule (DCS)** in 2016 for Examination. The updated timetable changes are reflective of the latest Local Development Scheme timetable, which came into force on 1 October 2015.

The South Worcestershire Councils are therefore now inviting representations on the DCS, prior to submission.

Please submit your representation by using this form and answering the questions below. If you need to continue on separate sheet, please remember to state which question you are responding to.

Question 1: Do the South Worcestershire Council's Draft Charging Schedules strike an appropriate balance between the desirability of funding infrastructure from the Levy and the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across the area?

Yes	
No	✓

Comment:

Please see covering letter (ref: ST/SWDPCILRep)

Question 2: Does the Regulation 123 list clearly and effectively set out the types of infrastructure that the South Worcestershire Councils intends will be, or may be, wholly or partly funded by CIL (or S106 agreements)?

Yes	
No	✓

Comment:

Please see covering letter (ref: ST/SWDPCILRep)

Question 3: Do you agree with the proposed CIL rates for each of the South Worcestershire Councils?

Yes	
No	✓

Comment:

Please see covering letter (ref: ST/SWDPCILRep)

Question 4: Do you agree with the proposed CIL rates for the specific strategic site areas?

Yes	
No	✓

Comment:

Please see covering letter (ref: ST/SWDPCILRep)

Question 5: Do you have any views on the proposed Instalments policy?

Comment:

Please see covering letter (ref: ST/SWDPCILRep)

Question 6: Do you have any further comments to make? If so, please make your comments below, as clearly and concisely as possible. If you are referring to any particular text in the CIL DCS, please state the relevant paragraph number.

Comment:

Please see covering letter (ref: ST/SWDPCILRep)

Comments received will be acknowledged and registered and will then be carefully considered in preparing the final documents to go forward for Examination, prior to eventual adoption and implementation by the South Worcestershire Councils.

Signature

	
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Date

18/04/2016

Responses to this consultation should be sent to the e-mail contact address and/or postal address shown at the top of this form. Please ensure all responses are marked for the attention of the South Worcestershire Development Plan Team.

Representations must be received by 5:00pm on 16 May 2016. Any representations made after that date and time will be considered "Not Duly Made" and will not be taken into account.

Thank you for completing the form.