

Our Ref: ST/SWDPCILRep2

15 August 2016

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



Dear Sir or Madam

Re: Representations to South Worcestershire Development Plan – CIL Statement of Modifications Consultation (Rep Reference Number 002)

I refer to the South Worcestershire Development Plan CIL Statement of Modifications 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. This representation follows on from an earlier one made in relation to the Council's CIL Draft Charging Schedule, which was submitted on 18 April 2016.

To summarise the above representation, I commented 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 Charging Authority Proposed Levy Rate table (Table 1). In response, South Worcestershire Councils have responded that because sheltered/retirement houses is not a use class in its own right and is not recognised as a separate category, no changes are required. I wholly disagree with this response.

As previously stated, the Government are placing a greater emphasis on Councils making provision for the changing needs of older residents (paragraph 021 of the NPPG). Indeed the need to provide housing for this sector of the market is considered to be "**critical**".

Other Local Authorities have adopted a nil rate for retirement housing in their Charging Schedule, namely Monmouthshire Council, Tewkesbury Borough Council, Stratford-on-Avon District Council. As such, despite the absence of a separate use class for retirement housing, there is no reason why a nil rate cannot apply in South Worcestershire Councils CIL Charging Schedule.

I trust the above comments can be considered in the South Worcestershire Development Plan CIL 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


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Planning Manager


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Following consultation on the Draft Charging Schedule (DCS) in April/May 2016, a statement of modifications schedule has been produced to accompany the CIL examination submission material. The statement of modifications lists the proposed changes the SWC are seeking to make to the CIL charging schedule as a result of representations received during the DCS consultation period (schedule 1), and any other minor amendments that the SWC have identified in reviewing the draft documentation prior to submission (schedule 2).

The South Worcestershire Councils are therefore now inviting representations on the statement of modifications, prior to undertaking the CIL examination hearing sessions.

Please submit your representation by using this form and answering the questions below.

Proposed Modification Number: PM

(The PM reference numbers are located on the statement of modifications schedules)

Question 1: Do you agree with the proposed modification? Please continue on a separate sheet if you require further pages.

Yes	
No	X

Comment:

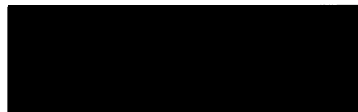
Please see covering letter (reference ST/SWDPCILRep2).

Right to be heard

Do you wish to appear at the CIL examination?

Yes	
No	X

Signature



Date

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 22 August 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.