

On behalf of my client McCarthy & Stone Retirement Lifestyles Ltd, I provide the following comments in respect of the Community Infrastructure Levy Draft Charging Schedule consultation document.

We broadly support the principle of the Council's Charging Schedule, with respect to the Levy rates per square metre of development and Charging Zones, provided they are Circular compliant.

We would however like further clarification as to why the Council has deemed that only C3 residential developments (excluding affordable housing) should be subject to the Levy. Many forms of non residential developments also increase demand on local infrastructure and are eligible for CIL charges under the Community Infrastructure Levy Regulations 2010. We would like to query the Council's approach as we compete against other land uses in the purchase of sites and the limitation of CIL and affordable housing contributions to residential developers only will prejudice our ability to purchase land.

We also propose that the Levy is charged against the net saleable area rather than the gross internal area of a development. Many forms of specialist housing development, such as retirement living housing for the elderly, provide communal areas for residents at an additional cost to the developer. Specialist housing providers will also have to pay additional CIL monies for communal areas as opposed to other forms of residential development that will only pay on 100% saleable floorspace. This does not provide a level playing field for these types of specialised accommodation and means that a disproportionate charge in relation to saleable area and infrastructure need is levied.

Thank you for the opportunity for comment.

Yours faithfully

Ziyad Thomas

Ziyad Thomas
Planner
The Planning Bureau Ltd

0161 926 3376 (office)