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BURRY & KNIGHT
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Planning Policy

From: Rachel Lamb <rachel.lamb@turley.co.uk>
Sent: 18 June 2014 15:17
To: Planning Policy
Cc: Ryan Johnson
Subject: Representations to the CIL Draft Charging Schedules for Christchurch and East Dorset

CILACS 4.

Dear Sirs,

Please see below our representations to the Draft Charging Schedules for Christchurch and East Dorset.

Question 1 – Yes we reserve the right to participate at the Public Examination on the Draft Charging Schedule

Question 2 – We do not agree with the CIL rates proposed, in particular the rate proposed for residential development, which seems high when viewed in the context of nearby authorities (please see our previous representations submitted on behalf of Burry and Knight). Furthermore, elements of the viability methodology are questionable, for example the June 2013 PBA report assumes an average requirement of 30% affordable housing from qualifying sites. However, the adopted policy position is 35% from urban sites and 50% from green field sites. The PBA report should assess the adopted policy position. This is a significant omission in our view and may have significant implications for CIL charging levels.

Question 3 – In our view, the proposed CIL rates do not 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 – please see our comments in relation to question 2.

Question 4 – The evidence on viability should be amended and updated – please see our comments in relation to question 2.

Question 5 – We object to the exclusion of a discretionary relief policy (CIL regulation 55) in the current consultation document. The omission of discretionary relief is too inflexible to be effective on a site by site basis over the plan period. Please see our previous representations in this regard.

Question 7 – The inclusion of a draft CIL instalments policy is welcomed however we would suggest some amendments to the proposed policy based on our experience nationally:

Level of CIL charge	Number and Amount of Instalments	Timing of instalments
Less than £50,000	1 Full Payment	Full payment within 60 days of commencement
£50,000-£250,000	3 Equal Instalments	1 st payment within 60 days of commencement
		2 nd payment within 6 months of commencement
		3 rd payment within 9 months of commencement
£250,000 or more	3 Equal Instalments	1 st payment within 60 days of commencement
		2 nd payment within 6 months of commencement
		3 rd payment within 9 months of commencement
		4 th payment within 18 months of commencement

Question 8 – The provision of a 'payment in kind' policy is welcomed.

We trust these representations will be of assistance however please do not hesitate to contact either me or my colleague Ryan Johnson if you have any queries.

Kind regards,

Rachel

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