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From: Gina Day on behalf of Christopher Burton
Sent: 27 April 2015 16:42
To: CIL Consultation
Cc: amanda.williams@avon.gov.uk; Anna Kay (a)

Subject: CONSULTATION ON THE COMMUNITY INFRASTRUCTURE LEVY PRELIMINARY DRAFT CHARGING SCHEDULE
Attachments: 0105-22.m5.pdf

Please find attached letter in respect of the above for your attention.

Kind regards

Gina Day
 Secretary
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CIL Consultation
Forward Planning
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Tiverton
EX16 6PP

Date: 27 April 2015
Our Ref: JS/CB M5/0105-22
Your Ref:

By email only: cilconsultation@middevon.gov.uk

Dear Sir or Madam

RE: CONSULTATION ON THE COMMUNITY INFRASTRUCTURE LEVY PRELIMINARY DRAFT CHARGING SCHEDULE

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

As it stands we feel that our comments on the Local Plan Review (CB M5/0105-21) and the Preliminary Draft Charging Schedule (EB/CB M5/0105-20) should be considered with this CIL Consultation. We are concerned that the level of affordable housing being delivered over the proposed Plan period is insufficient and that the Local Plan should be changed to reflect this. A consequence of this we support either a higher affordable housing target or an increased housing target in the Local Plan, which would have an effect on the CIL Charging Schedule.

However as it stands we support the CIL charging schedule, including the use of affordable housing thresholds as a way of differentiating between CIL rates. We also welcome the recognition that extra care can fall within the C2 Use Class

We have some reservations that the Council have not produced an Instalments or Exceptions Policy for us to comment on. We note that in the Summary of Representations to the Preliminary Draft Charging Schedule the Council have stated they will "...consider the introduction of relief when it considers the adoption of CIL after the examination." and that they will also prepare an Instalments policy before adoption. Our clients find such matters as very important, with the possibility of certain marginal sites having their viability affected; therefore we would wish to comment on such policies before examination so we have the ability to affect the outcome of any future decision.

The above comments are intended to be constructive and we welcome further opportunities to provide input. We would like to be informed of the progress of CIL charging Schedule; please ensure that the **South West HARP Planning Consortium** are retained on the LDF database, with **Tetlow King Planning** listed as their agents.

Yours faithfully

CHRIS BURTON MPLAN
ASSISTANT PLANNER
For and On Behalf Of
TETLOW KING PLANNING

cc: Aster Group
DCH Group