

JB/958/sf

8 July 2015

BY E-MAIL

Lynette Duncan
CIL Examination Programme Officer
c/o Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

Dear Lynette

Rother CIL Examination

Please find enclosed the response by Pioneer on behalf of Marchfield (Strategic Land) Ltd responding to Rother District Council's response to the original representations.

In addition to Pioneer's response, we note the following with regard to Proposed Modification 13 ('Mod 13') as set out in the Council's 'Schedule of Proposed Modifications to the Draft CIL Charging Schedule', dated 19 June 2015 (CD 36).

1. In his note to the Council (ED/5; CD20) the Examiner noted that the map of charging zones did not clearly identify the location and boundaries of the zones.
2. The charging zone map now included within the proposed modifications (CD35) clarifies, for the first time, the extent of the revised charging zones:

In short, as made clear by this plan, the proposed charging zones around Bexhill are no longer based on the viability testing of site typologies by PBA.

For example, no greenfield site has been tested to the east of the town where (outside of the 'development boundary') a rate of £40 per sqm was originally proposed but where it is now clear (as of June) that a rate of £170 per sqm will be applicable (an increase of approximately £13,000 per average property); this contrasts with PBA's evidence on values, viability and headroom to the east of the town as contained in its original assessment (CD04). This is clearly likely to frustrate, if not entirely prevent, any non-brownfield development within the eastern half of the area surrounding the town.

The Examiner may wish to discuss this further under Item 1 of his agenda.

The above is notwithstanding our other representations that the West Bexhill Broad Location should be treated on a par with the North Bexhill Broad Location (as there is no difference between the two and the Strategy for Bexhill is reliant on both) and included within charging zone 3(c).

Yours sincerely



John Boyd
Managing Director
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Encs