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Date: 19th June 2015



Lynette Duncan
Rother CIL Examination – Programme Officer

Dr Anthony Leonard
Executive Director of Business
Operations

Town Hall
Bexhill-on-Sea
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Dear Lynette,

Rother CIL Examination

Further to my letter of the 9th June 2015 and following consultation with our Consultants Peter Brett Associates, I am in a position to respond to the representations submitted by Savills, Marchfield and Aspinall Verdi respectively. Furthermore I have responded to the issues raised in the Examiner's Note (ED/5) dated the 8th June 2015 and consequently I attach a Schedule of Proposed Modifications to the draft charging schedule.

Please find with this letter the following enclosures:

1. Rother District Council's Response to Persimmon Homes Plc (Savills) Representation;
2. Rother District Council's Response to Marchfield's (JB Planning) representation;
3. Rother District Council's Response to Morrisons Supermarkets Plc (Aspinall Verdi) representation;
4. PBA - Non-Residential Appraisal (Appendix);
5. Rother District Council's Response to the Examiner's Note; and
6. Schedule of Proposed Modifications to the Draft Charging Schedule

In order to save examination time, and hearing time in particular, I can confirm PBA met with McCarthy and Stone on Monday 15th June with the objective to reach common ground over the proportion of communal floorspace found in retirement home schemes.



The nature of the objection centred on the percentage level of communal floorspace. PBA have used 20% which is within the Retirement Housing Group (RHG) guidelines but McCarthy and Stone have argued that this assumption should be at least 25% or in some cases 30%.

At the meeting it was agreed that the schemes presented mainly reflected McCarthy and Stone schemes across the south of England and were not necessarily representative of the cross market developers of retirement products within Rother, which include for example Churchill and Amicus. It was also agreed that McCarthy and Stone non-sales space does tend to be higher than other providers and that there are different types of 'retirement' provision that would still meet the definition contained within the addendum. On this basis it was agreed that in terms of Rother it would be appropriate to use the mid-point of the potential ranges of non-sales space set out in the RHG guidance. The RHG guidance suggests that for retirement living non sales space should be allowed for within assessments from 20% - 30% of building floorspace. Therefore with the agreement of McCarthy and Stone, PBA have retested the retirement typology at 25% communal floorspace, up 5% from the 20% originally used.

The result of the retesting shows that a retirement scheme in Rother would have a headroom of £199 p sq.m. Subsequently the CIL rates for retirement properties and the buffer are as follows:

Headroom	CIL rate (Retirement)	Buffer
£199	£200 Battle, Rural North & West	-1%
	£135 Rye, Hastings Fringes and Rural East	32%
	£170 Bexhill Greenfield	15%
	£100 Bexhill SUA	50%
	£50 Bexhill Urban	75%

In discussion with McCarthy and Stone it was agreed that an acceptable buffer for retirement development would be around 15%-30%, depending on site type and location. As the table above demonstrates this means that the proposed CIL rates would be acceptable within all zones apart from Battle, Rural North & West, where the headroom if CIL is applied would be negative.

The Council have agreed to recommend though Modifications that the CIL rate is reduced within the Battle, Rural North & West zone in respect of retirement homes. Whilst not to over complicate the charging schedule it is accepted that housing for older people is an important component of the housing mix and that it should not be unduly put at risk. It is considered that the approach represents an acceptable compromise between the delivery of infrastructure to support development while not putting that development at risk.



In terms of an appropriate buffer, it is considered that as Rye and rural would represent similar risks in terms of this type of development that a similar buffer of 30% is applied. Subsequently revised CIL rate of **£140 per sq.m** is presented.

The Council therefore request that the Examiner allows the proposed Modification to amend the CIL rate for retirement homes in the Battle, Rural North & West Zone from £200 per sq.m to **£140 per sq.m** and that McCarthy and Stone withdraw their comments in respect of the percentage of communal floorspace within retirement home developments.

If you have any further questions please feel free to contact me or Norman Kwan.

Yours sincerely,



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David Marlow

Planning Policy Manager

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