

Number of responders 52

Preliminary Draft Charging Schedule consultation questions March/April 2016

1. Do you agree with the proposed residential rates?

Yes 14

No 21

If no please explain

Subject to appeal court ruling on developments of fewer than 10 houses, CIL should be paid on all residential developments, but at a lower rate. CIL rates are too high and are a significant contributor to the high cost of housing.
Planners are being encouraged to do more small scale sustainable ecologically sound development so it seems large development should have a much higher levy imposed where as smaller development should be encouraged with much lower levies. None profit making residential for individual private use should not be prohibitive. Let the larger more damaging development pay.
We need more houses, so don't put people off from building them
The Three Dragons report refers to various housing market areas. Can I suggest an even clearer expression in the Three Dragons report "Hereford Hinterlands North & South" is commonly used throughout the report
Seems to be a very unfair geographical variation across the county with the Ross area being particularly badly treated.
The differential of levy rates between areas is too great. The overall funding that is to be raised may be sensible, but the range of levy charges is not acceptable.
Concerned the high rate of CIL attracted by housing developments in Ross will prevent the development taking place.
I don't agree with some areas, particularly, Ross being charged much more than other areas. Especially as the money raised is being spent in other areas
The residential CIL should be higher to supplement reduced industrial and office CIL. The logic for this that industrial and office development improves employment capability with corresponding improvement in unemployment levels in the production and services industries which are more beneficial than retail and leisure by encouraging the increase of a more skilled workforce. Residential expansion should follow a raised level of affluence derived from lower unemployment and higher salary levels generated from an improved skill level of the general workforce.
They are based on grandiose plans for expansion and spending that do not

<p>reflect the precarious state if the economy of Herefordshire (or indeed of England generally).</p>
<p>We believe that the charges are too high compared to our neighbouring Kington Housing Market Area villages. They should be more evenly distributed to facilitate equal housing opportunities. We do not understand why Pembridge is supposedly part of the KHMA in other surveys and yet with regard to the CIL we are not treated the same as our neighbours. There should be a balance to ensure we all are able to be deliver growth. We feel that levies of £100 and £110 are too high to encourage investment.</p>
<p>I think that they are too arbitrary and could result in unwanted problems.</p>
<p>The reason that Stretton Sugwas Parish Council cannot agree with the proposed rate per sq m is that it is an arbitrary figure which does not necessarily take account of local needs or local Parish Council Neighbourhood Plan ambition's, for example the promoting of good architecture and landscaping design which enhances the built environment and demonstrates quality of both design and build could be discounted from the arbitrary rate to encourage others. In addition the rate set does not permit variation to encourage the building of bungalows and/or single storey accommodation which is better suited for older people and which would permit those residents to remain in their own homes for longer. We therefore could accept the proposed £100 per sq m in most scenarios but believe a series of discounts or penalties should apply to the basic rate to encourage or discourage developments which do not serve or enhance the community and meet the objectives of Local Neighbourhood Plans.</p>
<p>Should be higher</p>
<p>The research on which the rates are based is substantially inaccurate and flawed</p>
<p>I do not understand why Leominster has such a low rate, when its population is poorer than the other market towns. We need the opportunity for more 'infrastructure'; such as schools, health centres etc. etc.</p>
<p>I am concerned that in the more rural areas where it most likely that single dwellings will be built rather than 2 or more, no infrastructure monies will be received and the Parish Councils concerned will receive no income. 10 or more dwellings built on single plots in a parish will ultimately impact upon the parish. I believe the proposals discriminate against the more rural areas.</p>
<p>We have various concerns and objections - in brief: The charges for Ledbury/Ross and Northern Rural Areas are too high - the idea that property or land in large areas of Herefordshire can sustain a tax of between £100 - £200 per m2 is misguided. We would suggest that a figure closer to £50.00 - 80.00 max would sit within the spectrum of viability. The charges for large sections of the county would render Herefordshire non competitive given the level CIL in our neighbouring counties (and indeed Nationwide - some of the Herefordshire Zone charges are much higher than charges adopted in high value areas of the London Boroughs). Herefordshire has some of the highest proposed CIL charges in the UK and yet is one of the lowest house value areas. Our neighbouring area CIL charges are significantly less. We have a</p>

shortage of development land and a shortage of housing in the county - we desperately need to attract external investment, build new homes and we need families to move to the county - the benefits of New Homes Bonus, Council Tax and personal spend are ignored in the report and the CIL is so high that it will prevent homes being built and any that are will be too expensive for the economically active to purchase. It is likely that developers and people will look at other neighbouring areas such as Gloucester and Shropshire. A typical three bedroom family home of 150m<sup>2</sup> could be faced with a £30,000 CIL fee - with s106, s278 and Affordable Housing obligations development would be unviable and non deliverable. If very few homes are built then there will be no little CIL revenue to collect. The proposed charges are highly likely to prevent land coming forward - further exacerbating the 5 Year Land Supply issue - or will make development prohibitive and unviable - further exacerbating the housing shortage and affordability. Should a landowner and developer proceed with a development project the CIL will need to be added (fully or in part ) to the end house values, extending the asking price of property and stretching the gap of affordability. It seems unfair that no infrastructure upgrades are proposed for rural areas under the CIL delivery schedule and yet rural areas will be expected to contribute the greatest amount of CIL. We feel that the accompanying evidence is too convoluted and contradictory to be relied upon or even digested by most - it seems to be deliberately complicated and long winded. There are many inaccuracies in the assessment of country land and development dynamics, which have been communicated (and ignored) in great detail to the consultants. The consultants suggestion that large speculative developments are more expensive to deliver than small rural schemes is not correct - and the acknowledgement that single home schemes have unique associated extra costs should be extended to all schemes under 10 units in rural areas. Why are some rural areas divorced from their Housing Market Areas? For example Pembridge is within the Kington Housing Market Area for all other assessments and yet have been given a significantly higher CIL than other villages in the KHMA. Pembridge has been asked to accommodate 60 + homes in the next 15 years and are keen to see new family homes built to support their rural facilities, especially the school and shop, and yet would be too expensive to develop with a £100 - 110 CIL compared to neighbouring villages such as Lyonshall and Almley. It would be better to balance the CIL rates in rural areas so that they were more reflective. A middle ground between £20.00 and £100.00 would not only give a more level playing field but would also ensure all areas had a greater chance of collecting a meaningful amount of CIL to undertake infrastructure upgrades.

There needs to be an equitable fee across all sites having reduce fees for the large strategic site seems outrageous and unjust. At least with current system the sites contribute to the services that the site places pressure on. Whilst CIL is meant to provide an easier system to work with it should be fairer

Referring to recommended CIL rates for Residential development on strategic sites: LB2 North of viaduct - the rate of £30 per m<sup>2</sup> should be increased to £50 per m<sup>2</sup>.

Table 6-9 and para 6.21. there seems to be no logic for the choice of the CIL rate in that in the final column of the table, where CIL can be supported, either

'all case studies can support this rate' or 'only one case study is not able to support this rate'. No reason is given for which choice is made in each case. As values are likely to increase over time it would make sense to choose 'only one case study is not able to support this rate'. For Leominster, based on para 6.15 for small sites the rate would then be £100. This would make much more sense as the bulk of samples were in the range £107 to £170.

2. Do you agree with the proposed retail rates?

Yes 21

No 11

If no please explain

Small convenience retail should be encouraged by exemption from CIL
Larger developments should pay much more so that smaller more ecologically sound ones can be economically encouraged
Too high, will not encourage investment.
Unlikely to be applicable in Pembridge. We support rural enterprise in the Parish and wouldn't like to see barriers imposed upon business.
Stretton Sugwas Parish Council has not received any representations or comments from those business interests who have operations within this category within the Parish boundary relating to this proposal and therefore have objected on the basis that there is not a tick box that covers "no comment".
Should be lower to encourage business
No view

3. Do you agree with the proposed hotel and leisure rates?

Yes 23

No 7

If no please explain

Hard to see the logic of charging CIL on hotels when other commercial uses are exempt. Tourism is the county's most important industry. If hotels are liable, so should other commercial developments be.
We support rural enterprise in the Parish and wouldn't like to see barriers imposed upon businesses such as leisure and tourism.
Stretton Sugwas Parish Council has not received any representations or comments from those business interests who have operations within this category within the Parish boundary relating to this proposal and therefore have objected on the basis that there is not a tick box that covers "no comment".
No view

4. Do you agree with the proposed office and industrial rates?

Yes 19

No 11

If no please explain

The same rate of CIL as proposed for hotels would be appropriate
The Council does not currently charge CIL on Intensive Livestock Units The council could charge CIL on these if it chose to and it should - they have enormous impacts, not least on the roads and make no contribution because they are not liable for CIL, business rates or council tax.
Office and Industrial CIL should be lower as explained in question 2.
We are assuming the rate is £0 which we support but the information is not clear on the draft charging schedule.
Stretton Sugwas Parish Council has not received any representations or comments from those business interests who have operations within this category within the Parish boundary relating to this proposal and therefore have objected on the basis that there is not a tick box that covers "no comment".
Should be lower to encourage
No view
We don't think there should be any charges on offices, especially in rural areas as they provided employment and generate much need income.

5. Do you agree with the proposed storage and distribution rates?

Yes 23

No 7

If no please explain

Ditto Above
We are assuming the rate is £0 which we support but the information is not clear on the draft charging schedule.
Stretton Sugwas Parish Council has not received any representations or comments from those business interests who have operations within this category within the Parish boundary relating to this proposal and therefore have objected on the basis that there is not a tick box that covers "no comment".
How does this encourage the provision of plots/housing???
No view

Any other comments

The Marine Management Organisation (MMO) is a non-departmental public
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body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

### **Marine Licensing**

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

### **Marine Planning**

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the [East Inshore and Offshore marine plans](#) were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our [Marine Information System](#). The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

### **Minerals and waste plans and local aggregate assessments**

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.

The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.

The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.

The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

We support the nil rate for all other uses as community and cultural facilities are generally unable to bear the cost of CIL for viability reasons. They make a positive contribution to the provision of cultural wellbeing in an area, and are often run by charities or trusts.

This seems vastly overcomplicated and heavily penalises small developers (2 or 3 dwellings) in an arbitrary fashion. Would it not be more equitable to have one list rather than two, with one common set of exceptions. Thus being demonstrably fair and the same for all, along the following lines:

I cannot understand why you have not included industrial farming applications in this - these are the most common and most controversial form of planning in the county and I fail to understand as they generate such wealth for a few individuals while negatively impacting on the rest of the community and ability for other business growth why they have not even been considered

The Council does not currently charge CIL on Intensive Livestock Units The council could charge CIL on these if it chose to and it should - they have enormous impacts, not least on the roads and make no contribution because they are not liable for CIL, business rates or council tax.

I fail to see why there are no CILs on intensive livestock units! They have a large impact on the roads and do not even have to pay council tax or business rates! It doesn't make sense!

The rates should be on all developments including industrial, like chicken and turkey sites and industrial sized pig rearing sites. They put nothing into the maintenance of the roads, put a lot of stress on the already fragile environment. Employment on these sites is non-existent in most areas, the feeding and

<p>cleaning is all mechanical so needs no help until it has to have maintenance. Let's have a fair system and put the levy on all constructions including the farming community.</p>
<p>I think the Herefordshire Council should charge CIL on all intensive livestock units in the county. These units have a very considerable impact on the area and environment around them, not least on our roads, and yet their owners already pay no Council Tax or Business Rates. Surely they should contribute to the Community Infrastructure Levy in the same way that an individual wanting an extension to their house will be expected to contribute?</p>
<p>I feel that affordable housing requirement should be necessary for less than 11 houses. Small villages are quite likely to have sites of less than 11 houses and therefore unlikely to receive any affordable housing. One in 4 should be affordable with a maximum requirement of 2 affordable houses. The affordable houses should have a levy of £0/sq m. Otherwise villages will only be for the rich and there will be no housing for young, local people.</p>
<p>I strongly propose that HCC should charge CIL on all intensive livestock units</p>
<p>This MUST be applied to intensive agricultural/industrial developments such as Broiler Sheds. It would be completely unfair to do otherwise as these developments currently pay no Council Tax or Business rates and have a severely detrimental effect on the countryside and the communities who live in the vicinity. This would be a simple way for them to make at least SOME contribution to the parishes in which they operate.</p>
<p>There is no reference to intensive livestock units-- the pressure that these units put on infrastructure--roads and services is significant. I note that in general such units bring little or no extra employment or other benefits to the rural areas on which they are imposed. They should carry a significant level of levy</p>
<p>I strongly agree that industrial agriculture should be levied, as this, more than any other development causes the worst air and water ground source pollution, smell, disgusting product, extra large truck traffic and an unsightly blight on an otherwise beautiful landscape in Herefordshire.</p>
<p>I can't see any provision for agricultural buildings! Intensive livestock units should be treated in the same way as other businesses. Since they impact on the roads they ought to be paying a tax. After all they do not have to pay council tax or business rates.</p>
<p>The Council should charge CIL on All Intensive Livestock Units!</p>
<p>I propose that a charge should be made under the Community Infrastructure Levy for all intensive livestock units.</p>
<p>I propose that a Community Infrastructure Levy should be made for all types of Intensive Livestock Units.</p>
<p>It is glaringly inequitable to Ross to take money for development in the town and spend it all in the north of the county. Investment in Ross is tragically poor as it is and this adds insult to injury.</p>
<p>Also, money raised should be spread more evenly around the county. Ideally</p>



<p>to support declining facilities such as public toilets and county roads</p>
<p>This proposal is at best naïve. It has a 'cliff edge', so astute developers will construct 9-10 units over the border in a cheap area, not a dear one.</p> <p>If you want to raise cash, charge capital gains tax on the unearned, inflation-adjusted profits from house sales and keep the rate at near the top income tax rate.</p> <p>This is a bureaucratic nightmare. The only means to improve the UK development control process is to make it more like Germany and countries where in built-up areas the public sector buys land at existing use value, gives it planning consent and sells it to self builders or developers.</p> <p>The New Towns Development Corporation did this in Milton Keynes and elsewhere. The profits from such a process mostly go to the public sector and help fund local services.</p> <p>Outside AONBs and National Parks, stop imposing such dirigiste design rules and relax it to be more like the suburban USA where anyone who complies with the 'default' lists of materials (brick, render, glass, tile, slate et al), setbacks, ridge heights, etc needs no further planning permission.</p> <p>But given that this is the UK, which is immune to rational proposals, I forecast zero progress and predict that house prices will continue to be out of reach of 60-80% of the working population.</p>
<p>Why are intensive agricultural developments excluded from the CIL payment? They are one of the main causes of pollution and nuisance to the environment and should pay their way too.</p> <p>This is a big industry and they can afford to pay the CIL payment. Why does Herefordshire Council always favour the farming industry whilst penalising other businesses?</p>
<p>Given it's polluting effects and damage to roads the exclusion of intensive agricultural developments is indefensible. This contradicts the generally accepted principle of the polluter pays!</p> <p>This multi-million pound industry is in effect being subsidised by the ratepayers of Herefordshire. Intensive poultry and animal rearing units are factories and should be rated and treated as such. This is not farming it is industry. It should pay its way. If this were done there revenue would go a long way to repairing our crumbling roads.</p>
<p>Why is there no proposal to charge CIL on intensive livestock units? This is the most rapidly growing sector in the county representing hundreds of thousands of square metres of new development each year. They generate large volumes of traffic movements, but make no contribution to the infrastructure because they are not liable for business rates.</p>
<p>It should be charged at the same rate across the county if we are going to do this at all.</p>
<p>The Council could not see any credible rationale behind the allocation of charges. Whilst we acknowledge that the schedule is informed by an</p>

assessment of head room and viability on projected development returns, it is hard to see how this has been applied rationally. The proposal to apply no CIL to larger residential developments in the Hereford Hinterlands is directly contrary to the stated aim of the Council (via Cllr Paul Rone – Cabinet Member) that CIL should be applied to helping to fund the western relief road. A situation where CIL is charged on developments away from Hereford to fund infrastructure which will benefit the City and its traffic flows is likely to be robustly challenged by developers, possibly to the point of a judicial review as it appears to violate the principals of proportionality and locality implicit in CIL. If this is not corrected now a charging schedule will be imposed which makes CIL unworkable across the County.

The high level of CIL suggested for smaller residential developments in Hereford suggests that this is considered a buoyant property market and yet the City Centre Urban Village site is proposed for zero CIL. This is the site that will benefit most from the infrastructure investment around the Edgar Street Grid site, and yet will make no contribution to it. It is hard to see how smaller residential developments in the city have head room for a £200 per square metre CIL charge, but the most sought after site does not. This appears to be another semi opaque subsidy to the developer who has already benefitted enormously from Herefordshire Council's progressive reductions in land prices to support the retail site, and the substantial infrastructure development which makes the construction possible.

The CIL charge on the Hereford strategic sites is to be welcomed although given the pressure for housing in Hereford and the large investment of public funds in supportive infrastructure necessary to facilitate these developments, £35 per square metre seems low.

Following consideration Committee **RESOLVED** to submit the following initial response:

- The Town Council has concerns that the draft CIL charges assumes that the proposed Leominster southern link road, which will service the Leominster Southern Urban Extension (SUE), will be funded by the development as there is no formal funding allocation contained in the proposals;
- There is an assumption that the additional infrastructure required to service the SUE will be funded by the development. This includes the provision of a new school, open spaces, leisure facilities and other community infrastructure;
- The Town Council has concerns that there is no flexibility within the draft CIL to ensure that the required infrastructure will be delivered by the SUE development;
- Details regarding the provision of the required infrastructure when the SUE is developed should be included in the final adopted CIL policy in addition to how that funding will be raised;
- A mechanism needs to be included in the allocation of CIL to allow local communities to access CIL funding if planned infrastructure is altered, changed or not delivered. This will

enable communities to try to mitigate against a potential shortfall to reduce the potential impact of any infrastructure shortfall.

We are concerned that the high rate of charge on schemes of 2-10+ units will put landowners and developers off and risk our ability to meet the proposed proportional growth targets. It is unlikely that we can meet our target delivery on single schemes alone. We anticipate that our most appropriate rural schemes will be proposals of 2-10 units and yet these are penalised to the point in non deliverable and non viability. This would mean we would get 25% of nothing as there will be no development or a surge of single applications producing no income. We are also concerned that there are no Rural Area infrastructure plans on the delivery draft and so rural areas are being asked to provide 75 % of a levy without any discernible benefit. We cannot fund our own infrastructure delivery projects with 25% (if we even get 25%!) and so will once again be left without crucial investment.

I would suggest that there needs to be an element of flexibility to cater for specific situations - difficult those this may be to quantify.

Thank you for your consultation, I note the schedule and other details. I have no comments to make on the material but appreciate being consulted. It is likely that we will advance our own CIL when the present examination of the Allocations Plan is concluded.

Stretton Sugwas Parish Council is not convinced that CIL income which is a capital receipt will not be ring fenced and used to offset Local Authority grant or precept in respect of revenue expenditure, this of course, would be entirely unsustainable. As we set out in our response to question 1, we believe that there should be a formalized discounting structure to encourage a series of criteria to be met to meet local needs ranging from quality design, sustainability in terms of green energy and waste management as well as appropriate house types and layouts for local occupation. These discounts could be reviewed as soon as criteria are met and new ones emerge. We remain deeply concerned that CIL should not be used to do anything other than enhance the quality of life and the built environment through modest infrastructure projects in local communities and should never be used to cover shortfalls in revenue income and expenditure items.

Please can you explain why this for rural communities in close vicinity of chicken broiler units cannot benefit from this proposal?

I ask because the owners of this type of livestock unit reap financial profit, which is fine, however it is at a cost to the local community (undeniable) who receive no financial benefit to enhance community facilities, and who instead suffer from real downsides:

i/ significant property value drop

ii/ increases heavy traffic

iii/ very frequent foul odour: who would choose to buy a house in within an environment where the air is so unpleasant as to make one's eyes water.

Contrary to the often cited 'creation of employment' benefit, this is mostly

negligible to the point of irrelevant.

I cannot see a fair reason as to why rural communities should not be included in the CIL.

Natural England does not consider that this Revised Preliminary Draft Charging Schedule poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

Brampton Abbots & Foy Group Parish Council agrees with the CIL payment instalment policy

On 21 March 2015, the Government updated paragraph 021 of the National Planning Policy Guidance (NPPG) putting a greater emphasis on Councils making provision for the changing needs of older residents.

Indeed, the guidance stresses that older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (use class C2).

It states that "The need to provide housing for older people is critical" [my emphasis].

I note that within the Revised Preliminary Draft Charging Schedule (PDCS) there are a range of rates required for residential development set in two categories- namely developments of 11 dwellings or more (£100 per m2 or developments of fewer than 11 dwellings (£110 per m2). There are exceptions to this, with different rates (including a level of £0) in certain areas of the Authority.

I strongly believe that a nil rate across the Authority should also be applied to specialist accommodation such as retirement housing.

Reference to 'C3 Sheltered/Retirement Houses' should be explicitly added to the recommended CIL rates summary table.

Viability testing in other Authorities in the South West demonstrates that sheltered retirement housing, which is classified as use class C3, is very challenging.

It is my firm belief that applying CIL rates to retirement developments will be to constrain the delivery of schemes. I therefore hope that any adopted CIL Charging Schedule can be adapted in a way that does not constrain this much needed form of development.

Indeed, paragraph 018 of the NPPG supports this assertion, advising that "For older people's housing, the specific format and projected sales rates may be a factor in assessing viability".

Our homes have many features which allow versatility as and when it is required or necessary.

As such, I truly believe that a Blue Cedar home helps reduce the likelihood of needing to move into a residential home, due to frailty in later life. All of the properties benefit from estate maintenance -both communal and individual.

Factors such as higher build costs and a longer selling period for our properties make retirement housing less viable than new homes in general.

Therefore, it is imperative that when determining CIL rates, the Authority completes an accurate development scenario for specialist accommodation for the elderly to ascertain whether it can support the same level.

I note that in the report on the Examination of the Draft Hertsmere Borough Council Community Infrastructure Levy Charging Schedule, December 2013 (PINS/N1920/429/12), developers of specialist retirement housing, McCarthy and Stone and Churchill Retirement Living, and Hertsmere Borough Council recognised the important difference between retirement housing and general needs housing in their charging schedule.

The same approach should be considered and taken by Herefordshire Council in its CIL Charging Schedule.

Currently, I believe there is no reasonable justification for a CIL charge on retirement housing in any area of the Authority and, at the same level as general needs housing.

I believe that a housing scheme which provides a real need for specialist housing, such as retirement dwellings, should be exempt from CIL as well as affordable housing, similar to the C2 use class. Indeed, the Revised PDCS has a nil contribution for other non-residential uses which includes care homes (C2 use class).

Furthermore, it should also be recognised that by providing this type of housing for the elderly to downsize, larger family homes would become vacant. As a minimum, all forms of C3 retirement housing should be explicitly exempt from CIL.

The CIL proposal has been ongoing for a very long time and seemingly becomes more and more convoluted and contradictory. At the proposed level it will prevent delivery, stifle investment, put jobs at risk and make housing less affordable. What everyone now needs is some certainty - and a viable and pragmatic approach that won't stifle development, but will enable the delivery of new homes that are affordable and desirable and contribute fairly (rather than being penalised). We would urge HC to look at the charges adopted in others areas (available on the internet) and to listen to those who own potential development land and are involved in land purchases, planning approvals, development projects etc rather than the consultants in isolation.

The revised proposed rates for CIL for future residential building affecting Bircher Ward and Luston Group of Parishes in particular appear to be an improvement on those proposed initially.

If my understanding is correct, a single dwelling in the Rural Hinterlands will attract a zero rating whereas the development of a greater number but less than eleven dwellings will be charged £200 per sq m per property.

We are a group of villages and hamlets which have been added to as the need for more houses became necessary, one at a time in a balanced and somewhat organic way. Over the last 40 years, as the car and commuting became more popular, 5 small developments have appeared within the then newly designated conservation area of Luston. They did not happen all at

once but they had a profound effect upon the village. The amenities are minimal; no shop, no post office, no garage, no restaurant or a working public house. There is a primary school which is very popular with people outside the parishes so it is not dependent on a pool of children being created within the boundaries.

For the last decade development of the villages and hamlets has reverted to the historical pattern of 'as and when needed' rather than imposed speculative development. This has allowed for the character of the area to absorb small changes without it being lost.

The CIL proposed for this part of Herefordshire has the potential to support this kind of environmentally friendly growth without the potential swamping of the parts of Herefordshire which have helped to make it the attractive county it is.

We are confident that the housing obligations for this area expressed in the Core Strategy will be met by 2031 following historical growth patterns.

Please indicate how you heard about this consultation:

Email	27
Letter	1
Hereford Times newspaper	3
Ledbury Reporter	
Herefordshire Council website	3
Social media	
Other	7
If social media or other, please specify.....	
Raised in parish meeting	2
Word of mouth	2
Member of council	2
Papers in Leintwardine Library	1