

David Holmes

From: Andrew Hull [Andrew.Hull@thrivehomes.org.uk]
Sent: 17 July 2014 13:37
To: trldf
Subject: Community Infrastructure Levy Draft Charging Schedule Consultation

Dear Sir/Madam

Community Infrastructure Levy Draft Charging Schedule Consultation

I write further to Claire May's recent letter, dated 2 July 2014. Thank you for the opportunity to comment upon the draft charging schedule.

Thrive Homes is the largest provider of affordable housing in Three Rivers and has implemented a strategic plan which requires us to increase the supply of affordable properties across our areas of operation by building new homes. Therefore, the implementation of the Community Infrastructure Levy (CIL) will have a direct impact upon our business.

Having reviewed the range of CIL documents, Thrive Homes' comments are as follows:

- The proposed CIL levels appear to be calculated in accordance with a sound evidence base, particularly the *Infrastructure Delivery Plan* and the Lambert Smith Hampton's *Economic Viability Assessment* (updated May 2014);
- Generally, the CIL levels applicable to residential buildings appear viable;
- We support the three tier approach, with varying CIL rates depending on an assessment of property values, land value and build costs in each identified area;
- The vast majority of Thrive's proposed development programme will deliver affordable tenures and, therefore, will be entitled to the statutory exemption from CIL charges. However, we would suggest that Three Rivers District Council considers a discretionary exemption for non-affordable homes on mixed-tenure developments which are Registered Provider-led. Given the scarcity of public funding for new affordable homes, RPs are increasingly developing sites which include private sale and/or market rent properties. This is necessary to provide cross-subsidy to ensure the delivery of new affordable homes on the sites. In such cases, a CIL requirement could

dramatically affect the economic viability of the development and lead to a reduction of affordable housing and overall housing delivery.

Should you require any further information, please do not hesitate to contact me.

Best regards,

Andrew Hull

Head of Development

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