



Head of Strategic Planning
Three Rivers District Council
Northway
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Hertfordshire
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04th August 2014

**McCARTHY & STONE RETIREMENT LIFESTYLES LTD.
REPRESENTATION TO THE COMMUNITY INFRASTRUCTURE LEVY - DRAFT CHARGING SCHEDULE**

As the market leader in the provision of retirement housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the emerging Three Rivers District Community Infrastructure Levy (CIL), insofar as it affects or relates to housing for the elderly.

McCarthy & Stone Retirement Lifestyles Ltd. provided commentary on the Preliminary Draft Charging Schedule in February 2013 in which we in turn expressed our concern that the emerging CIL could prohibit the development of specialist accommodation for the elderly at a time when there is an existing and urgent need for this form of development. Notably we raised concerns as to how specialist accommodation for the elderly differs from general needs housing through key issues including, amongst other things, communal floorspace built to a higher specification, a slower sales rate and higher empty property costs. On this basis we respectfully requested that a specific development scenario for sheltered accommodation be carried out for this form of development.

In response to our representation we note that the Council have amended the CIL charging schedule by applying a flat rate of £120 per m² retirement / sheltered housing across the District. **We commend the Council for recognising the viability issues associated with developing this form of development and support the Retirement Housing rate as per the charging schedule.**

For a point of clarification could the Council confirm whether the Retirement Housing rate would be applied to Area C (South Oxhey)? The Council correctly notes the lower values / viability issues in this part of the District and applies a £Nil rate for residential development on this basis. We would assume that, given the viability of Retirement Housing is more finely balanced than that of general housing, that the £Nil levy rate would also be applied to this form of development. There is however scope for confusion on this issue as it would appear that the £120 per m² rate for Retirement Housing is District wide and therefore would also apply to Area C.

We note that there are a good range of shops and services located in South Oxhey and that, subject to an appropriate viable site coming forward, it may be an appropriate settlement for Retirement Housing. We would therefore request that the £NIL levy rate is also applied to Retirement Housing in Area C or that this is clarified in the Charging Schedule.

We commend the Council for recognising that the additional staffing and facilities required for these forms of development are provided at an additional cost to the developer and as such negatively affect viability. We would therefore like to support the wording of the footnote stating that C2 uses, including Care Homes and Extra Care accommodation, will not be required to pay CIL.

We do consider that the distinction between Retirement Housing and these forms of development could be made clearer using the following wording:

"...These premises often have emergency alarm systems and/or wardens. These developments do not however have the enhanced facilities required to provide the level of on-site care expected in care homes or extra care premises (C2)".

In summary **we commend the Council's considered response to our objection and the willingness to test and ensure that specialist accommodation for the elderly remains deliverable under the proposed CIL regime.** As such we support the levy rates as proposed in the Draft Charging Schedule but respectfully request the Council considers our points of clarification.

Thank you for the opportunity for comment.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ziyad Thomas', with a long horizontal flourish extending to the right.

Ziyad Thomas
Policy Planner
The Planning Bureau Ltd.