

Representor No. 4559

Accession No. 17

Representation No.

Lucas, David

From: Charles de Winton [REDACTED]
Sent: 06 December 2012 16:26
To: Lucas, David
Cc: Sue Evans; Fenella Collins
Subject: Community Infrastructure Levy- CIL

Dear Mr. Lucas,

Further to my recent telephone call to you, I would be very grateful if you could consider the following aspects which I feel are important to our members in regards to business development.

1. You confirmed that CBC's current proposal will not seek to charge CIL for change of use for say conversion of a building from an Agricultural Use to a Business Use, however you would charge if our member were to seek to build new floor area. It would thus appear if a member of ours wanted to build a new build farm shop he would have to pay the same rate as Tesco in a purpose built retail park! This as you can see it would make a relatively modest farm shop proposal totally unviable from the outset. This would further prejudice rural farming enterprises from diversifying their business and also prevent the possibility of rural employment opportunities.
2. Residential property subjected to an Occupancy Condition. With the recent revision of TAN 6, where an affordable housing element has now been incorporated into the policy guidance, I note you stated the current draft policy does not recognise this and that CBC intends to charge CIL on property of this nature. Again by charging CIL the possibility of this type of property being constructed is going to be almost nil as the aim of the TAN 6 guidance is to house much needed rural enterprise workers with a view to an affordable element, this type of property **must not** be regarded as commercial residential property.
3. You did mention that there may be an option to have an exception policy so where there are issues as demonstrated above which do not fit into a one size fits all type arrangement, the Authority has the option to be able to vary or access applications on their individual merits, so the CIL policy does not end up as a blunt instrument which will actively act against rural businesses.

I would be more than happy to discuss further with you.

Yours sincerely,

CBP de Winton MRICS
Rural Surveyor- CLA Wales

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