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Nicole Penfold
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Re: CIL Submission Charging Schedule

Dear Sir/Madam

In response to the above consultation please find attached representations submitted by Gladman Developments.

I would appreciate if you could confirm receipt of this submission by responding to this email.

Kind regards,

Nicole

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Stratford-on-Avon District Council
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Submitted by email only: planning.policy@stratford-dc.gov.uk

12th November 2015

Dear Sirs,

Re: Stratford-on-Avon CIL Submission Charging Schedule

This letter is in response to the current consultation on the Submission Charging Schedule. Gladman submitted detailed comments (prepared by Carter Jonas) at the earlier rounds of consultation and refer back to these at this current stage.

Whilst Gladman have no additional comments to make in relation to the content of the consultation document, Gladman wish to raise a procedural issue. Gladman note that the Submission Charging Sessions is based on the level of development outlined in the Core Strategy Proposed Modifications (August 2015). The proposed modifications to the Core Strategy have been subject to a period of consultation, but the Examination hearings are yet to resume. Gladman believe that basing the CIL rate on the proposed modifications and new evidence prepared by the Council pre-empts the outcomes of the resumed hearings. The Inspector has not yet concluded that the current proposed scale of growth is sound.

Gladman recommend that the progress with the CIL be delayed until the outcome of the resumed EiP hearings is known. This would ensure that the CIL is based upon the scale of growth being planned for across the plan period. If however the Council press on with the figures from the proposed modifications it may result in abortive work on the CIL and a need for revisions and a further round of consultation. The PPG notes that "*Charging authorities should avoid making substantive changes to the draft charging schedule between publication and submission to the examiner. Substantive changes should always be avoided, unless they have been sufficiently consulted upon.*" (Reference ID: 25-032-20140612)

Gladman strongly urge the Council not to submit the CIL for Examination at this point in time. Gladman hope that you have found this representation constructive. If you would like to discuss the matter further please do not hesitate to contact one of the Gladman team.

Yours Faithfully,

Nicole Penfold
Policy Planner
Gladman Developments