■ framptons

Our Ref: PJF/LS/8808 (Please reply to Banbury office)

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28 November 2013

Policy and Spatial Planning
Solihull MBC
Council House
Manor Square
Solihull
B91 3QB
By email and post psp@solihull.gov.uk

Dear Sirs

TOWN AND COUNTRY PLANNING ACT 1990 COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT CHARGING SCHEDULE AND DRAFT REGULATION 123 LIST CONSULTATION DOCUMENT OCTOBER 2013

We write with respect of the above mentioned document.

It is submitted that the proposed charging regime for hotels of £25 per square metre in 'All Other Areas' will impose an unjustifiable cost burden upon hotel development and should be omitted.

As you know, the CIL Regulations (2010), as amended, state that "In setting rates the authority must aim to strike what appears to be an appropriate balance between the desirability of funding infrastructure through CIL and the potential effects (taken as a whole) of the imposition of CIL on economic viability of the development across its area."

Hotels by definition attract inward investment from tourism – whether recreational or business tourists, As such the contention that such development will impose demands on new social and physical infrastructure is very limited. Indeed it is considered that new hotel development is likely to attract new revenue into the borough form tourist expenditure. In consequence a CIL charging regime should not be burdened upon hotel development which raises revenue within the Borough.

Furthermore, it is submitted that the scale of charge is too onerous and will in itself be a disincentive to hotel development taking place. It is therefore considered that the proposed rate does not 'strike a balance' as it will impact on the economic viability of hotel development.



I trust that you will reconsider the expediency of the proposed charge on hotel development throughout the Borough.

If you have any queries, please contact Louise Steele at Framptons.

Yours faithfully



Louise Steele