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1 February 2013

Dear Mr Opacic,

Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule – Consultation Response

Thank you for consulting DIO on this matter.

I note that the City Council is proposing to charge CIL only on retail, hotel and residential development. I support the Council's decision to exclude other uses from the proposed CIL charge and note that in this instance "residential" would not include uses within C2A.

Of the three uses on which the Council intends to impose the levy, only the inclusion of residential has the potential to impact on MOD projects. You will be aware that married Service personnel often occupy rented accommodation owned by MOD, known as Service Family Accommodation (SFA) and the development of that accommodation would, potentially, be subject to CIL under the preliminary Draft Charging Schedule. However, MOD believes that there are particular reasons why the development of SFA should be exempt from the CIL charge or subject to a significantly discounted rate. Those reasons are based on the characteristics of SFA and the lower demands likely to be made on community infrastructure by occupiers of SFA.

Like affordable housing, SFA is developed and held only to address a specific housing need, rather than with the intention of making a profit through the sale of the dwellings. In this instance, it is intended to address the needs of Service personnel, a recognised group of Key Workers. Rental levels are heavily subsidised by MOD and are generally lower or equivalent to those charged by Registered Social Landlords.

In addition, the demands on infrastructure arising from the development of an enclave of SFA is likely to be much less than a similar sized development of either market housing or affordable housing, because of the characteristics of the occupiers and the nature of MOD service provision. Examples include:

- Medical and dental care for Service personnel is typically provided on the Establishment. Medical care on Establishments can sometimes also be extended to dependants. The demand for primary care services is therefore significantly lower;

- Service personnel engage in team and individual sports using facilities provided on the Establishment and the facilities can often also be used by dependants and the wider community. There is therefore less impact on POS and sports facilities provided and maintained by the Council;
- SFA areas typically include a range of MOD-funded community facilities – e.g., crèche / nursery school, community hall - reducing the demand for Council-operated services;
- A proportion of Service personnel arrange for their children to attend boarding school, using a MOD-subsidised scheme, to avoid potential disruption to their education caused when Service personnel are assigned to new duties in other locations. (Tour lengths are typically around 3 years). Around 7,900 school spaces were funded in this way in October 2011. The result of this is to reduce the demand for local school places arising from the SFA development.

On the basis of the above, I request that the Council consider either exempting the development of SFA from the proposed CIL charge or significantly discounting the rate charged for it.

Yours sincerely,

R. Sanderson

Senior Town Planner.

Note: Copy also sent by post.