



Ref: V001515/RR/rr
Date: 18 September 2014

Community Infrastructure Levy
Planning Policy
Bath and North East Somerset Council
PO Box 5006
Bath
BA1 1JG

VIA EMAIL

Dear Sirs

**SAINSBURY'S SUPERMARKETS LTD
BATH & NORTH EAST SOMERSET COUNCIL – COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT
CHARGING SCHEDULE**

We wish to make the following representations on behalf of our client, Sainsbury's Supermarkets Ltd, in connection with the above.

Viability Testing

We note that the BNP Paribas CIL Viability Assessment (May 2014) assesses five different retail scenarios, three of which relate to 'supermarkets'. Two of the retail scenarios relate to 'supermarkets' of 279 sq m and a third scenario relates to supermarkets of 1,000 sq m. Given that there is only one supermarket scenario tested above 280 sq m we do not consider that the evidence is fine-grained enough to justify the CIL charges proposed.

Bath Western Riverside

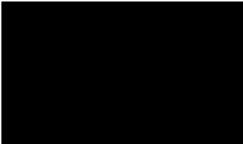
We submitted representations at the preliminary draft charging schedule stage noting that the impact of the charging schedule on the delivery of development in the Bath City Riverside Enterprise Area did not appear to have been assessed. The updated Viability Assessment (May 2014) still does not assess the impact of CIL on the delivery of development in the Bath City Riverside Enterprise Area.

The regeneration of this area is essential to the delivery of the Council's Adopted Core Strategy and the viability assessment should make specific reference to a hypothetical development in this area and whether it could support a CIL charge. Given the importance of the site and specific on-site matters to be addressed to enable development of the site a lower charge, or a complete exemption from CIL, should be considered.



We trust you will find these representations helpful. Please contact us if you have any further queries.

Yours faithfully,



Sarah Hawkins
Director