



Call for Representation Response Form

**Publication of the Community Infrastructure Levy
Draft Charging Schedule**

And

**Revised Planning Obligations
Supplementary Planning Document**

**London Borough of Tower Hamlets
Infrastructure Planning Team
April 2013**

Call for Representations Response Form for:

Community Infrastructure Levy Draft Charging Schedule and Revised Planning Obligations Supplementary Planning Document

If you are unable to use the Tower Hamlets Council's online consultation portal, you can use this form to provide your responses. Please refer to the [Statement of Representations Procedure](#) before completing this form. An electronic version of this form is available from www.towerhamlets.gov.uk/CIL.

About the Consultation

Consultation period:

5pm Monday, 22nd April 2013 - 5pm Wednesday, 5th June 2013

The Council will not be able to consider any representations received after the above consultation period.

Return this Representations Response Form to:

Post:

CIL Consultation
Infrastructure Planning Team
London Borough of Tower Hamlets
2nd Floor Mulberry Place
5 Clove Crescent
London E14 2BG

Email:

CIL@towerhamlets.gov.uk with 'CIL DC5' in the subject box.

Consultation Portal:

<http://towerhamlets-consult.objective.co.uk/portal>

Please note: If you send an email, or use the online consultation portal, it is not necessary for you to also send in a hard copy. In addition, copies of representations will not be treated as confidential and they will be made available for public inspection.

What happens next?

Following the receipt of representations on the CIL Draft Charging Schedule within the specific consultation period, the Council will:

- Consider all representations under the requirements set in the relevant legislation
- Summarise the main issues raised by all representations and publish a statement of representations, with original representations on the Council's website

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- Submit the CIL Draft Charging Schedule, the relevant evidence and supporting documents to an Independent Examiner

Those making representations on the CIL Draft Charging Schedule have the right to be heard by the Examiner. The Examiner will assess the compliance and appropriateness of the CIL Draft Charging Schedule and its supporting documents.

For the Revised Planning Obligations SPD, where necessary, appropriate revisions to the draft document will be made in light of consultation responses, before it is adopted.

Section B (1) – Representation to LBTH CIL Draft Charging Schedule

Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Examiner, based on the matters and issues he/she identifies for Examination in Public.

Questions:

1. Do you have any comments relating to the CIL Draft Charging Schedule and its supporting evidence?

Yes: (Please make sure you refer to the sections or paragraphs, to which your comments relate and provide details by using the box below for your comments. If needed, please continue on a separate sheet of paper.)

No

████████████████████ (98 East Ferry Road, postcode E14 3LL, purely residential) which in the Draft Charging Schedule is currently included in CIL Zone 1 but should be included in CIL Zone 3. As such the boundary of CIL Zone 3 should be moved such that CIL Zone 3 includes our house. This is both appropriate (based on the Tower Hamlets CIL viability report) and easy to achieve (as the property is right next to but outside CIL Zone 3).

To move the boundary is appropriate because:

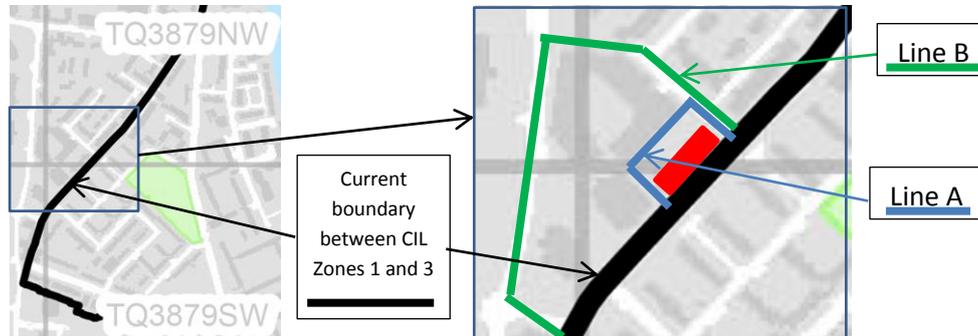
- The Tower Hamlets CIL viability report (Table 1.5.2) states that Cubitt Town (postcode E14 3) should be in Zone 3. ██████████ Cubitt Town, postcode E14 3LL, so therefore based on the report should be in CIL Zone 3
- Individually, the residential value of our house is cheaper than the average for every area across the borough in Table 4.3.1 of the viability report, as follows: of the areas

PLACE	VALUE PER SQ FT	SOURCE
Area 8	700	Average value for area, Table 4.3.1, Viability report
Area 7	650	
Area 6	575	
Area 5	500	
Area 4	470	
Area 3	430	
Area 2	400	
Area 1, including Cubitt Town	380	
Our house	303	Purchase price, Oct 2011 £425,000 for 1403 sq ft

As such, to charge us the highest CIL rate, applying to CIL Zone 1, when we have land of the lowest value (measured in a recent open market purchase) is grossly unfair.

- The difference in charge (£200 in CIL Zone 1 versus £35 in CIL Zone 3, per square metre, per LBTH CIL Draft Charging Schedule Apr 2013[1], page 3) is so large as to deter development. For example, on a 100 sq metre new house the difference would be £16,500, ie £20,000 in Zone 1 versus £3,500 in Zone 3.
- The viability report states (page 4): "CLG guidance requires that charging authorities do not set their CIL at the margins of viability". A CIL Zone 1 charge on my house's land would make development unviable

To move the boundary is very easy because (demonstrated by the diagrams below):



Draft charging schedule Appendix 1 showing referenced squares

Expanded section (including red block showing numbers 98 to 110 East Ferry Rd)

- The current boundary between CIL Zones 1 and 3 goes right in front of the house. It would be very easy to move the boundary either
 - 1) per Line A, which would start to the left of 110 East Ferry Road, head north –west along the boundary of that property, then north east along an access alley behind the 7 houses from 110 to 98 East Ferry Road, then south east along Roffey Street
 - 2) or per Line B, which would head from the boundary on East Ferry Road to Limeharbour, go north along Limeharbour then east along an alley between Limeharbour and Roffey St, then south east along Roffey Street.
- None of the suggested boundaries goes through the middle of potential development sites so both line A or line B could easily be adopted. Several other local authorities have zoning boundaries which are not fixed to roads so LBTH could also easily do this

In summary, it is both completely appropriate and entirely possible to move the boundary between CIL Zones 1 and 3 at the point shown to either Line A or Line B. It would be grossly unfair and inappropriate to leave 98 East Ferry Road within CIL Zone 1.

2. If your representation is seeking a change to the CIL Draft Charging Schedule, do you consider it necessary to attend the Examination in Public?

- Yes, I wish to attend
 No, I do not wish to attend

3. Please tick the box if you would like to be notified of about any of the following:

- If the Draft Charging Schedule has been submitted to an Independent Examination in accordance with section 212 of the Planning Act 2008 (as amended)
 Of the publication of the recommendations of the Examiner and the reasons behind those recommendations
 Of the approval of the Charging Schedule by the Charging Authority (The Council)