

JHM/DP3024

04 June 2013

CIL Consultation
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Dear Sirs,

**DRAFT CIL CHARGING SCHEDULE, MARCH 2013
REVISED PLANNING OBLIGATIONS SPD – MARCH 2013
SUBMISSION OF REPRESENTATIONS BY EXPRESS NEWSPAPERS**

On behalf of Express Newspapers, we write to submit representations to the above documents.

Express Newspapers hold an interest in the Westferry Printworks site on the Isle of Dogs. DP9 submitted representations to the Preliminary Draft Charging Schedule (PDCS) in December 2012. The publication of the Draft CIL Charging Schedule for the London Borough of Tower Hamlets (LBTH) is of particular interest to our client, given the potential implications it may have on the redevelopment coming forward on the site.

We expressed a number of concerns previously in relation to the PDCS, and its compliance with planning policy and statutory guidance. Following a review of the revised CIL Charging Schedule and the supporting documentation, these concerns still remain. On the basis of the evidence put forward by the Council, Express Newspapers considers that:

- An appropriate balance has not been struck between the need to fund necessary infrastructure and the potential economic viability of development across its area; and
- The Charging Authority has not complied with the requirements set out at paragraph 9 of CLG's 'Community Infrastructure Levy: Guidance' (April 2013).

Background: Planning Context

National Planning Policy Framework

"Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a



willing land owner and willing developer to enable the development to be deliverable.” (para 173)

“Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan. The Community Infrastructure Levy should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place.” (para 175)

The above extracts from the National Planning Policy Framework (‘NPPF’) provide a number of important policy steers in the formulation of CIL Charging Schedules. Of particular note:

- Planning policy should be deliverable.
- The viability of sites identified / allocated in the Development Plan should not be put at risk as a result of obligations and policy burdens.
- CIL charges, where practical, should be prepared and tested alongside the Development Plan.
- CIL should support and incentivise development.

The NPPF is therefore clear in that it requires local planning authorities to pay due regard to the implications of any obligations on development. For the majority of sites, particularly those of a strategic nature, CIL is one of the main financial obligations which could impact on viability, affecting the ability of development to come forward and ultimately the delivery of the Development Plan objectives.

LBTH Submission Managing Development DPD

The Core Strategy sets ambitious targets in terms of the delivery of housing within the Borough over the next 15 years. It requires the delivery of 43,275 units at a rate of 2,885 per year.

Fundamental to the Borough meeting its housing targets, is the delivery of its key strategic sites. Paragraph SA.2 of the emerging MD DPD acknowledges this by stating that:

‘If these sites were not identified and safeguarded for specific uses, the borough would be at risk of not being able to provide services and facilities for its communities’.

The Westferry Printworks is a key strategic site, with the potential to deliver a significant number of new houses, including affordable housing. Within the London Plan, the site is located within the Isle of Dogs Opportunity Area which has an indicative employment capacity of 110,000 and a minimum target of 10,000 new homes to be delivered over the plan period. Annex 1 of the London Plan states, ‘...Parts of the area have significant potential to accommodate new homes and there is scope to convert surplus business capacity south of Canary Wharf to housing and support a wider mix of services for residents, workers and visitors...’.

The site is identified for comprehensive redevelopment for a residential-led mixed use development under the recently adopted Managing Development DPD. Following discussions at the Examination into the Managing Development DPD, the Inspector recommended that a



secondary school be provided on the site. Discussions at the Examination indicated that this would require a land take of around 1.5 hectares.

The Westferry Printworks site is of strategic significance in the Borough, and can therefore be considered to be a critical site for the Borough in terms of meeting its strategic housing targets, including the delivery of affordable housing. Therefore the impact of CIL and S106 obligations are particularly pertinent and obligations need to be robustly tested in order not to harm the future delivery of strategic sites for housing and other infrastructure in the Borough.

Statutory Guidance

Charging Authorities are legally required to have regard to the CLG statutory guidance document – ‘Community Infrastructure Levy Guidance (December 2012) – when setting their proposed CIL levels.

The statutory guidance provides important detail guiding how Charging Authorities should go about preparing Charging Schedules and the nature of supporting evidence base material that is necessary. The statutory guidance is consistent with the central theme of the NPPF: planning policy should be deliverable and the viability of Development Plan sites should not be put at risk.

Fundamentally, the statutory guidance supports the representations set out below. The following extracts are of particular significance:

“Charging schedules should be consistent with and support implementation of up-to-date Local Plans” (para 4)

“...charging authorities should show and explain how their proposed levy rate (or rates) will contribute towards the implementation of their relevant Plan and support the development of their area. As set out in the National Planning Policy Framework in England, the ability to develop viably the sites and the scale of development identified in the Local Plan should not be threatened.” (para 8)

“The independent examiner should establish that:

- *the charging authority has complied with the requirements set out in Part 11 of the Planning Act 2008 and the Community Infrastructure Levy Regulations*
- *the charging authority's draft charging schedule is supported by background documents containing appropriate available evidence*
- *the proposed rate or rates are informed by and consistent with, the evidence on economic viability across the charging authority's area; and*
- *evidence has been provided that shows the proposed rate (or rates) would not threaten delivery of the relevant Plan as a whole.” (para 9)*

“In addition, a charging authority should sample directly an appropriate range of types of sites across its area in order to supplement existing data, subject to receiving the necessary support from local developers. The focus should be in particular on strategic



sites on which the relevant Plan relies and those sites (such as brownfield sites) where the impact of the levy on economic viability is likely to be most significant.” (para 27)

“Charging authorities should avoid setting a charge right up to the margin of economic viability across the vast majority of sites in their area. Charging authorities should show, using appropriate available evidence, including existing published data, that their proposed charging rates will contribute positively towards and not threaten delivery of the relevant Plan as a whole at the time of charge setting and throughout the economic cycle.” (para 30)

“The Government expects charging authorities will work proactively with developers to ensure they are clear about charging authorities’ infrastructure needs and what developers will be expected to pay for through which route. This is so that there is no actual or perceived ‘double dipping’, with developers paying twice for the same item of infrastructure.” (para 85)

“The charging authority’s proposed approach to the future use of any pooled section 106 contributions should be set out at examination and should be based on evidence.” (para 89)

Representations to LBTH CIL Draft Charging Schedule

Assessment of Sites

The Viability Study undertaken by BNP Paribas is based on an assessment of different development typologies which provide hypothetical schemes, including number of units, types and density. Following our representations in December 2012 to the PDCS, we note that BNP Paribas have now undertaken further work on strategic sites. We welcome the fact that a more detailed assessment of strategic sites has been undertaken, but have concerns about the methodology and findings within the BNP Paribas report.

Firstly, we are not clear as to how the 8 strategic sites have been chosen for assessment. There are 20 strategic sites identified within the Managing Development DPD. It is not sufficient to test 8 sites given the importance of all the strategic sites within the Managing Development DPD to the delivery of housing and infrastructure within the Borough. The cumulative impact of CIL needs to be considered across all of the strategic sites.

We note that three of the strategic sites which are the subject of viability appraisals, that include the proposed CIL Charging Rate, are not viable. For those sites that cannot afford to pay the CIL Charging Rate, it is stated at paragraph 7.14 of the BNP Paribas report that adopting a nil rate for CIL on these sites would not result in the developments generating residual land values above the benchmark land value. Whilst this may be the case, the imposition of CIL clearly reduces further the prospects of these strategically important sites coming forward, than if these sites were not subject to CIL. CIL is therefore putting a further financial burden on the development of strategically important sites which in our view is contrary to Paragraph 173 of the NPPF.

Strategic sites are fundamental to the delivery of housing and other infrastructure in the Borough. They are critical to delivering the Council’s housing numbers. Tower Hamlets has the highest housing targets of any London borough at 28,850 units over a ten year period, as set out in the adopted London Plan. To meet the housing target in the London Plan will require the delivery of



its key strategic sites. The outcome of the BNP Paribas report would suggest that the deliverability of some of these strategic sites will be further harmed.

We note that the viability appraisal in relation to Westferry Printworks has assumed that the site can accommodate a primary school and local park. The appraisal is not consistent with the adopted Managing Development DPD, which allocates the site for comprehensive mixed-use development required to provide a strategic housing development, a secondary school, publicly accessible open space, an expanded leisure facility, a district heating facility (where possible) and other compatible uses.

The provision of a secondary school on the site was the subject of significant debate at the Examination into the Managing Development DPD. The Inspector, recognising the fact that there may be concerns with regard to viability due to the need to accommodate a secondary school on site, recommended that the site allocation be amended to reference this fact and the following text was therefore included in the adopted Managing Development DPD:

'A new secondary school site takes first priority over all other non transport infrastructure requirements including affordable housing, in relation to the redevelopment of this site, to ensure that it is economically viable and that the new school is provided in a sustainable location to help meet education needs arising across the borough.'

A secondary school on the site would take around 1.5ha of the site. Added to the requirement to accommodate publicly accessible open space and an expanded leisure facility, which the development is required to provide under the site allocation in the Managing Development DPD, the developable site area would significantly reduce, thereby reducing the overall viability of the future development.

Assuming that the site would accommodate 1.2 ha of publicly accessible open space/expanded leisure centre and 1.5 ha of land for the secondary school, the actual developable area could be around 3.5 ha. Applying BNP Paribas's density figure of 260 units per ha would provide around 900 units, not the 1,186 units that are identified in the appraisal, which translates to a circa 25% reduction in unit numbers. The residual value of the scheme would therefore significantly decrease to the point where even under the BNP Paribas appraisal the development would only be marginally viable, if at all.

We would also seriously question whether the density range of 260 units per ha is a robust assumption. The site has a PTAL rating of 2 according to the TfL Planning Information Database. Indeed, the north eastern part of the site has a PTAL of 1b. According to Table 3.2 of the London Plan 2011, assuming the site lies in an Urban area and would deliver 3.1-3.7 hr/ha, the expected density range for a PTAL 2 site would be 55 to 145 units per ha.

Whilst density levels may exceed the normal range for a PTAL 2 site, a density of 260 units per ha would fall well outside the guidelines in Table 3.2 of the London Plan. In fact it is almost 80% higher than the upper range for the site. The recent RICS guidance note 'Financial Viability in Planning' provides that viability cannot be judged on the basis of an assumption which is contrary to development plan policies.

The discrepancies in the appraisal for Westferry Printworks calls into question the robustness of the Viability Study, and the potential impact that the CIL Charging Rates could have on the delivery of all strategic sites in the Borough. We do not consider the Borough can rely on such high level viability appraisals to test whether its strategic sites can accommodate the levels of



CIL proposed. Each site is unique and detailed appraisals would be required, in conjunction with the landowner, to form a robust conclusion.

Variations in Residential Values across the Borough

We previously submitted representations at the PDCS stage, expressing our concern that the residential values within the CIL Zones, do not accurately reflect the different residential values across the Borough. We re-state the representations we previously made below again.

Paragraph 34 of CLG's statutory guidance document explains that Charging Authorities can set differential levy rates for different geographical zones provided that those zones are defined by reference to the economic viability of development within them. The BNPP Viability Study does not adequately explain or justify the link between development viability and different geographical charging zones.

The PDCS identifies three CIL Zones. Express Newspapers does not agree with the boundaries to these zones, nor the large disparity between the rates applicable to these zones and considers they do not reflect the wide variation in values for residential development across the Borough.

The administrative area of Tower Hamlets is a Borough which experiences significant disparities in economic wealth, which is reflected in the value of residential property. Tower Hamlets has some of the poorest areas in London and the UK, yet it is also home to more affluent areas, such as Spitalfields and land adjacent to the River Thames. As a result, there are wide variations in residential values over small areas, with high value and low value pockets throughout the Borough.

CBRE was commissioned by Express Newspapers to provide advice on residential sales values in the Borough, particularly in CIL Zone 1 within which the Westferry Printworks site is located. The note and plan attached at Appendix A illustrates the findings.

In summary, the CBRE work demonstrates that there are wide variations in residential values across CIL Zones and in particular CIL Zone 1. Average new build pricing ranges from £901 per sqft to £465 per sqft within CIL Zone 1, which represents the greatest variation of prices within any of the zones. There are specific areas where higher values are located, for example within the City Fringe. At the lower end of CIL Zone 1, values are more towards £465 per sqft, with St George's Estate, Shadwell and Verdigris, Bethnal Green. To put this in context, BNP Paribas in its viability assessment to inform the MD DPD, identified sales figures of £604 per sqft for the Westferry site, significantly below the higher values achieved elsewhere within the Borough.

With such wide variations in values across Zone 1 and areas in the other proposed zones with higher residential values to our Client's site, and the uniqueness of the socio-economic picture of the Borough, we would question the approach that is being proposed to limit the charging zones to three areas. The Viability Study prepared by BNP Paribas at Table 6.16.1 illustrated 8 zones which we would regard as potentially more appropriate. Express Newspapers is concerned that the current identification of 3 very broad zones and the large differential in charging rates applicable to them will threaten the viability of development in the less valuable locations within each Zone and it considers that a more detailed assessment is required of price variations in the Borough with the identification of more charging zones and a more diverse charging rate. This more detailed assessment, if based upon postcodes, should include within Zone 3 postcode E14 8



The Regulation 123 List and S106 costs

The Viability Study makes an assumption in relation to the level of S106 contributions which would be payable by schemes at £1,220 per residential unit. As we previously commented, this is a very precise figure and there is no explanation as to how this has been calculated or what infrastructure it could cover.

We assume that there must have been some benchmarking against previous S106 costs. The need to undertake an exercise of benchmarking against recent Section 106 obligations has now been recognised by CLG. Paragraph 22 of the new Statutory Guidance explains, at paragraph 22, that “as background evidence, the charging authority should ... prepare and provide information about the amounts raised in recent years through section 106 agreements. This should include the extent to which affordable housing and other targets have been met.”

Express Newspapers is concerned that the Council has not considered the S106 costs sufficiently to be certain that the S106 levels would not exceed the £1,220 per unit identified. For key strategic sites such as Westferry Printworks, there is likely to be higher levels of infrastructure and services to be funded. For example, it is not clear at this stage how the secondary school would be delivered on the site and whether this would be a Section 106 or CIL cost. This reinforces our previous point that the appraisals are too generic, and that there are site specific circumstances that need to be considered.

In relation to the Regulation 123 list published, we would make the comment that this is a very generic list and does not provide any clarity on what infrastructure will be provided as part of CIL. It is important that the Regulation 123 list is transparent because as we highlight below, sites such as Westferry Printworks are delivering strategically important infrastructure identified in the Regulation 123 list.

We note in the Revised Planning Obligations SPD that a number of the strategic sites identified in the Managing Development DPD have a requirement to provide one or more specific pieces of infrastructure and that the Council may accept CIL as a payment ‘in-kind’ for these, such as the provision of land. We are not clear as to how such provision has been factored into the overall assessment of requirements for CIL, and what mechanism is in place to allow for land to be taken as a payment ‘in-kind’ for CIL.

For example, in the CIL Infrastructure Planning and Funding Gap Report, the Infrastructure Delivery Plan identifies in Appendix A that there is a need for the provision of 27 FE secondary places required by 2021/2022 at a cost of £81m. Two sites, including the Westferry Printworks site, are allocated to bring forward secondary school provision within the Managing Development DPD. It is not clear how the provision of secondary schools by these sites has been taken into account in the CIL Infrastructure Planning and Funding Gap Report, or how it has been considered within the appraisal reports contained within the Viability Study.

The Westferry site is also specifically required to provide open space, but this is also identified as a Regulation 123 item. The CIL Infrastructure Planning and Funding Gap Report identifies a cost of £16.4m for open space in Appendix A. Again it is not clear how the provision of land by these sites is taken into account in the CIL Infrastructure Planning and Funding Gap Report, or how it has been considered within the appraisal reports contained within the Viability Study.

Representations to LBTH Revised Planning Obligations SPD



The Revised Planning Obligations SPD would benefit from greater clarity on its application in circumstances where provision is provided on site. For example, in relation to the requirement to provide public realm, it should be made explicit that sites allocated to provide public open space in the Development Plan will not be subject to S106 obligations to deliver open space and that such provision will be accepted as an in-kind CIL payment. In 6.19, the text refers to the provision of 'Local Parks'. This term is not consistent with the Managing Development Plan, where the allocations, including the one for Westferry Printworks, refers to the provision of 'publicly accessible open space'. The SPD should be consistent in terminology in order that sites such as Westferry are not providing public open space as well as making a financial contribution towards it.

In relation to the requirements for energy contributions, our client objects to the requirement that developments not meeting the carbon reduction targets should pay a contribution. There are sites that, due to their physical constraints, will not be able to meet the carbon reduction targets and in these circumstances it is unreasonable to request a 'top-up payment'. There is no policy basis upon which to support the approach being taken.

Our client has a similar comment in relation to the proposed obligations for biodiversity. There is no clarity on what threshold levels need to be met before a payment is triggered. Furthermore, the obligations would seem to penalise those sites that, for physical reasons, are not capable of contributing to biodiversity.

The significant missing element of the SPD relates to the actual level of contributions which are being sought. Without these, it is difficult to understand the impact of the obligations on the viability of development and how these relate to CIL. This also relates back to the point made earlier that the £1,220 S106 cost factored into the appraisals is not robust.

Conclusion

As per our previous representations, we are not satisfied that the evidence base presented to underpin the Draft CIL Charging Schedule is robust and the consequences of adopting the Charging Rates set out within it have been properly considered. There are two fundamental areas of concern: the first relates to the lack of analysis of strategic sites and the implications on the viability of development, including the delivery of the Borough's housing and other infrastructure requirements; and, the second relates to the setting of the charging zone boundaries.

In relation to the Revised Planning Obligations SPD, it is considered that greater clarity is required on when the obligations apply and how they relate to sites delivering infrastructure as part of their development. Fundamentally, the costs of the obligations needs to be made clear to understand the impact on viability and to be able to comment in detail.

Express Newspapers would be willing to meet with LBTH to discuss the above concerns further, if this would be of assistance. If you would like to discuss further, please contact Jonathan Marginson at this office.

Yours faithfully,

DP9



Tower Hamlets - Variation in Residential Sales Values

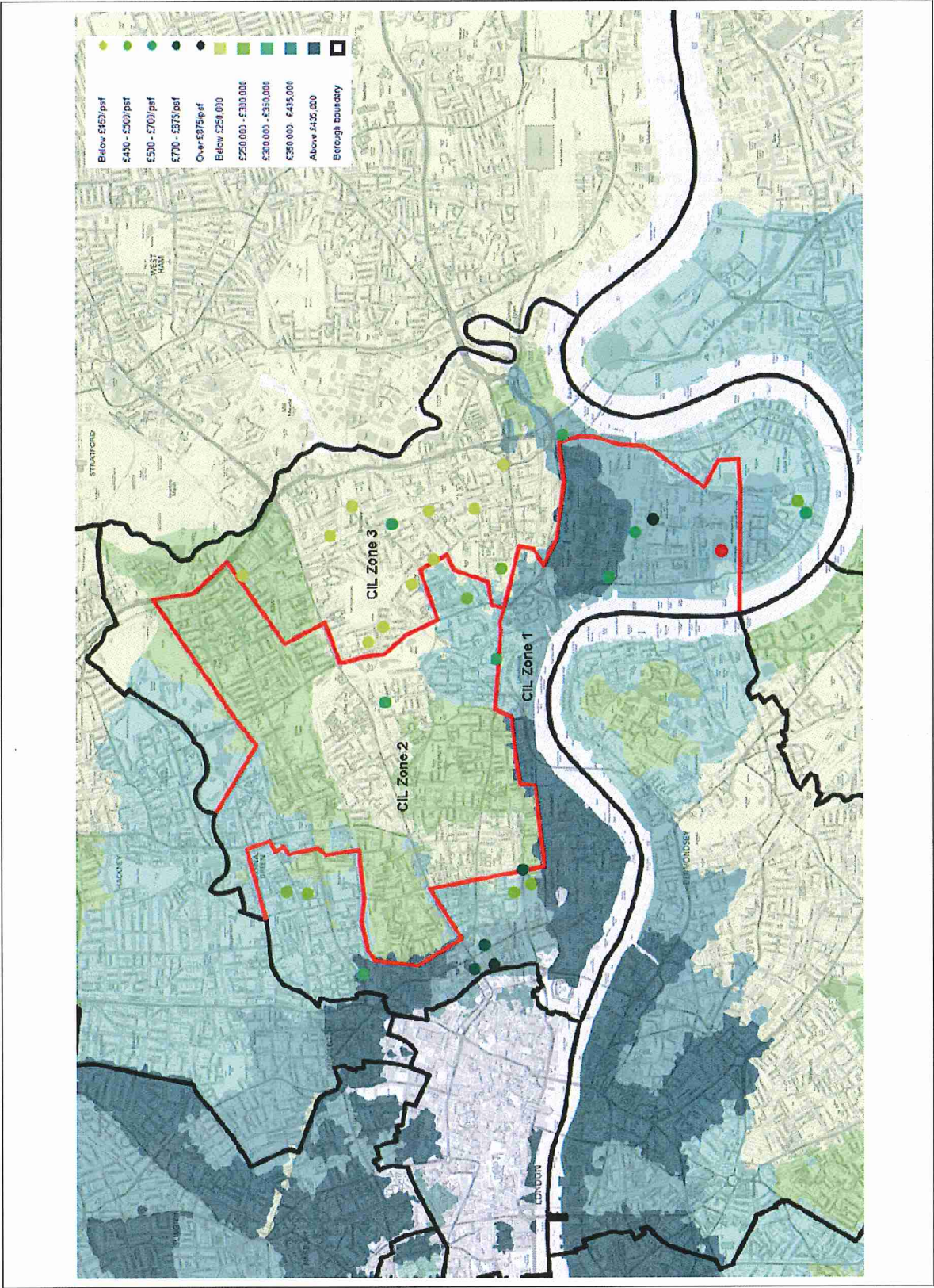
Tower Hamlets Residential Pricing

Key Summary Points

- The shading on Map 1 shows the average value of flats, at postcode sector level, during the period of Q4 2011 to Q3 2012 (predominantly second hand stock) according to the Land Registry.
- Map 1 illustrates the disparity in average residential flat values across Tower Hamlets, with values increasing as you sweep across the borough from the East (£235,000 in Mile End and £245,000 in Bromley-by-Bow) to South West (£612,000 in Canary Wharf and £645,000 in Wapping).
- The dots on Map 1 show the average price per square foot (according to Molior) of schemes which have sold since 2008 and have over 50 private residential units (the one exception being 'Infinity' currently marketing with 8 private residential units). The values range from £901 per square foot (Pan Peninsula) to £355 per square foot (The Square).
- Tables 1, 2 and 3 highlight the variation in new build values across each of the three CIL charging zones. The tables show the scheme with the highest average £ per square foot pricing and the lowest.
- Average new build pricing ranges from £901/sft to £465/sft within CIL Zone 1.
- Average new build pricing ranges from £513/sft to £393/sft within CIL Zone 2.
- Average new build pricing ranges from £602/sft to £355/sft within CIL Zone 3.
- CIL Zone 1 has the greatest variation in new build pricing (a £435/sft difference) with schemes at the top end averaging close to £900/sft and those at the bottom end averaging around £465/sft;
 - Top end of CIL Zone 1 market
 - Pan Peninsula averaging £901/sft located in E14 9
 - Goodman's Field averaging £889/sft located in E1 8
 - One Commercial Street averaging £866/sft located in E1 7
 - Bottom end of CIL Zone 1 market
 - St Georges Estate averaging £465/sft located in E1 8
 - Verdigris averaging £478/sft located in E2 7
 - SpacE1 averaging £479/sft located in E1 1
- The draft CIL zone boundaries as it stands, by charging a set rate within each of the three zones, will therefore affect viability of schemes in different ways, as residential values differ within zones and across zones.

Tower Hamlets - Variation in Residential Sales Values

Map 1. Average residential flat values and new build residential values



Tower Hamlets - Variation in Residential Sales Values

Source: Land Registry, Molior

Table 1. Details of new build residential schemes within CIL Zone 1

	PAN PENINSULA	ST GEORGES ESTATE - PHASE 2
Postcode	E14 9SL	E1 8HP
Average postcode sector flat value	£401,000	£399,500
Scheme status	Complete	Under construction
Developer	Ballymore Group	Telford Homes Plc
Private units	736	139
Average £/sft	£901	£465

Source: Molior

Table 2. Details of new build residential schemes within CIL Zone 2

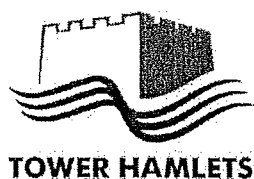
	CQ LONDON	AXIO
Postcode	E14 7LA	E3 4AX
Average postcode sector flat value	£302,000	£245,000
Scheme status	Complete	Under construction
Developer	A2 Dominion	Luminus Group
Private units	215	87
Average £/sft	£513	£393

Source: Molior

Table 3. Details of new build residential schemes within CIL Zone 3

	STREAMLIGHT	THE SQUARE
Postcode	E14 9PE	E14 6NX
Average postcode sector flat value	£401,000	£243,000
Scheme status	Complete	Under construction
Developer	Swan New Homes	One Housing Group
Private units	66	86
Average £/sft	£602	£355

Source: Molior



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**

Representor reference number
For internal use only

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 DCS' 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

- 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

PLEASE SEE ATTACHED LETTER

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)

Section B (2) – Representation to LBTH Revised Planning Obligations SPD:

The adoption of a CIL Charging Schedule will have significant implications for how the Council plans for the delivery of infrastructure and secures Planning Obligations from new developments. In order to provide clarity on the Council's approach to the continued use of planning obligations together with the London Borough of Tower Hamlets' CIL, the Revised Planning Obligations SPD will be adopted alongside the CIL Charging Schedule.

4. Do you have any comments relating to the Revised Planning Obligations Supplementary Planning Document?

☒ 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

PLEASE SEE ATTACHED LETTER

Signature:

ppg

Date:

4 JUNE 2013