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Dear Colleagues,

### **CiL – Statement of Representation**

I am writing to you on the behalf of Gateway Housing Association in accordance with s172(2)(b) of the CiL Regulations 2010.

Following a review of the draft charging schedule I would like to make the following points:

1. *Communal Areas:* I understand that even in affordable housing developments the only relief to be sought is in relation to the GIA of the “dwelling” and not the communal areas. On the basis that the charging schedule already discounts plant areas, I would have thought that in the interests of overall scheme viability communal areas associated with the “dwelling” could also be subject to relief when calculating the chargeable amount.
2. *Community spaces:* It is not clear how this will be treated in the documentation. It is not uncommon for mixed tenure housing projects to also deliver community related spaces and on the basis that these can be delivered for charitable uses we would expect qualifying community spaces to attract relief against the CiL when calculating the chargeable amount.
3. *Zone Areas:* Gateway Housing has housing stock right across the Borough. Whilst it is clear that the zoning around Canary Wharf is understandably high, this zone also includes areas of housing that is not materially impacted by the inflated prices associated with the Canary Wharf financial district.

Gateway Housing Association is the new name for Bethnal Green and Victoria Park Housing Association and Labo Housing Association who merged on 31 March 2008



Patron: Baroness Uddin of Bethnal Green  
Registered name: Gateway Housing Association Limited  
Registered office: 409–413 Mile End Road, London E3 4PB

Registered with charitable rules with the  
Financial Services Authority No. 10433R  
and the Housing Corporation No. L0517

A member of the National Housing Federation

For example, we have stock in Mellish Street off Tiller Road which is listed in zone 1 and yet in terms of land value this would be similar to areas listed in Zone 3 on the Isle of Dogs. We would therefore suggest that the zone differentials are reconsidered on the Isle of Dogs to avoid these CiL charging distortions materially impacting on future housing delivery in these areas.

Gateway Housing Association understands that the CiL will simplify the way in which future developments are able to mitigate their local impact and ensure that investment into local infrastructure is capable of meeting the needs of the local community. We are however anxious to work with Tower Hamlets on a charging system that strikes the appropriate balance needed to also enable and increase the future development of affordable housing.

If you require any further information, please do not hesitate to contact me on 020 8709 4322.