

Haringey Local Development Framework

Consultation Report on the Haringey CIL Draft Charging Schedule consultation.

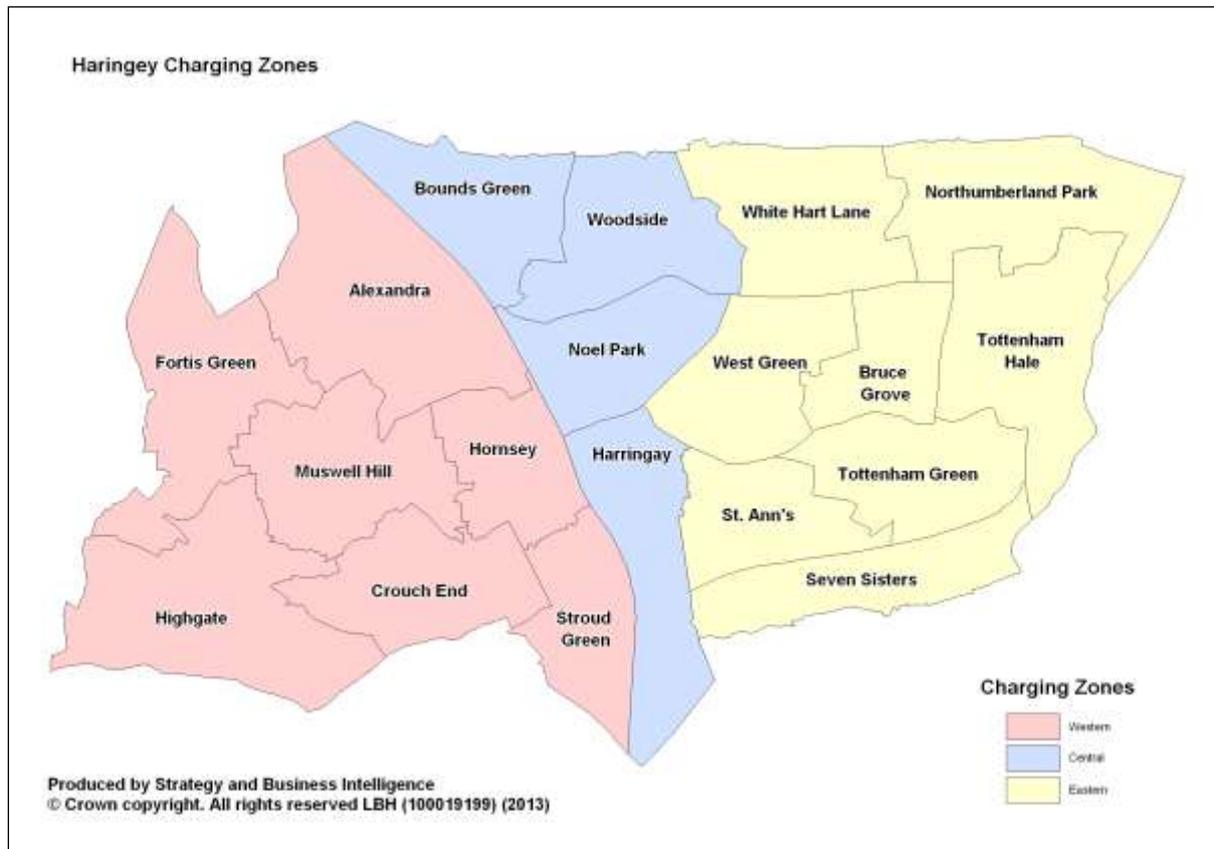
1. Consultation Overview

1.1 The Draft Charging Schedule (DCS) consultation was held from 24th April until 14th June 2013. The consultation period was extended from an original closing date of 24th May after a group of consultees was identified as having not been informed of the consultation. All consultees have been given a minimum of 4 weeks to respond to the DCS, in line with the CIL regulations.

1.2 The **Draft Charging Schedule contained the Council's preferred set of rates** for consultation before submission of the document for Examination in Public (EiP). The proposed final; Charging Schedule is included below.

Draft CIL Charging Schedule for Haringey				
Use	West	Central	East*	Mayoral CIL
Residential	£265	£165	£15	£35
Student accommodation	£ 265	£165	£15	£35
Supermarkets	£95			£35
Retail Warehousing	£25			£35
Office, industrial, warehousing, small scale retail (use class A1-5)	Nil Rate			£35
Health, school and higher education	Nil Rate			Nil
All other uses **	£50			£35
** It will apply to C1, C2, and C4, and D uses not included above and sui generis. Student housing can fall into multiple use classes, but any privately rented student accommodation will be charged the student accommodation rate set out above.				

1.3 The map below shows the CIL charging zones:



2 Methodology

- 2.1 The consultation methodology and process were in line with Regulation 16 of the Community Infrastructure Levy Regulations 2010, and the Council's Statement of Community Involvement.
- 2.2 Letters and emails were sent to all consultees on the LDF database, including individual residents, community and voluntary organisations, **residents' associations**, other stakeholders and statutory consultees, notifying them of the purpose of the consultation, where to view the document and how to respond. A notice was placed in the Haringey Independent on the 25th April providing all relevant information.
- 2.3 The relevant information and documents were made available on the Council's website.
- 2.4 A copy of the Consultation document was made available to view at:

- All Haringey libraries;
- Civic Centre - High Road, Wood Green, N22 8LE; and
- River Park House - Level 6, Wood Green, N22 8HQ.

3 Summary of representations

3.1 The Council Received 21 written responses from a mix of developers, government departments, surrounding authorities, local residents, and infrastructure providers. In addition to formal written responses, there were a number of email and phone enquiries regarding the consultation. Where phone calls were received, it was suggested that written representations should be made if the issues identified wanted to be considered in finalising the CIL charging schedule. Where these were enquiries regarding what CIL was, these have not been considered responses, and hence not analysed here.

3.2 A full list of the representations to the consultation are available on the Council's website at www.haringey.gov.uk/CIL.

4 Main Issues Raised

4.1 New statutory guidance was released 2 days after the consultation on the Draft Charging Schedule began. Having reviewed the guidance, the Council does not believe its Charging Schedule is sufficiently out of line with the guidance to require changes.

4.2 A number of responses drew attention to the lack of evidence that exists around the specific testing of sites. The Council believes that a sufficient range of types of sites are tested in its viability evidence to support the Charging Schedule.

4.3 London Borough of Enfield report that there is viability for retail of all sizes to support a £60/m² charge in their borough, and questioned the nil rate. **Haringey's evidence suggests differently, and in any case there is not proposed to be a significant quantum of new retail floorspace in the Borough.**

- 4.4 Respondents were interested to know how local groups can influence infrastructure provision, and spend CIL revenue in their areas, or as close to the permitted development as possible. The Council will spend CIL revenues in line with the CIL regulations.
- 4.5 Criticism of the benchmark land values was received regarding them being set too low, which underestimates the value at which landowners will release land to the market. The Council believe that the benchmark land values used are appropriate to evidence the proposed rates.
- 4.6 Multiple representations flagged up the lack of evidence for the £50/m² miscellaneous rate. Specifically infrastructure providers and theatres objected, which could be exempted in other ways, but there were also representations querying the rate from private developers. This rate will be withdrawn.
- 4.7 Respondent does not believe it will be possible for the charging authority to define whether a supermarket or other A1 use is being developed at the planning application stage, and therefore charge the correct CIL rate. A definition for supermarkets and retail warehousing will be added.
- 4.8 No consideration of whether charging one rate for supermarkets, and another for other retail, when they sell some of the same goods, is state aid. The Council does not believe that there is.
- 4.9 The Draft Regulation 123 list does not provide sufficient information to understand the extent to which Section 106 and 278 obligations will be scaled back and whether the £1,000 per dwelling assumed in the Viability Study is a justified assumption. An SPD relating to Planning Obligations will be prepared to clarify this issue.
- 4.10 One respondent identified what is a typo in the BNP evidence document. Where it should say £100-£200, it reads £100-£20. This is not considered to be a significant issue.
- 4.11 Respondents suggested a review point should be identified. This will be included in the final charging schedule.
- 4.12 LBE are confused about how the discretionary exemption for projects on the Infrastructure Delivery Plan will work, particularly whether large scale schemes which include IDP projects would be exempt from some or all

of the CIL charge. The removal of the £50/m² rate, this issue disappears as these typologies of development will attract a nil rate.

- 4.13 There were recommendations that several projects be added to the Infrastructure Delivery Plan/Reg123 List. All of these submissions will be considered during periodic reviews of the IDP and Reg123 List.

5 Statement of minor modifications

- 5.1 Minor modifications arising from the responses from the Draft Charging Schedule are:

- a) Removal of the £50/m² miscellaneous rate,
- b) Addition of a definition for supermarket and retail warehousing development,
- c) Provision of a final Red123 list in place of a draft one,
- d) Addition of a review point,
- e) Minor text editing.

- 5.2 Following the proposed submission consultation, the Charging Schedule will be Examined in Public by an independent inspector. It is anticipated that the Charging Schedule will be implemented from 1st April 2014.

Appendix: Summary of comments received and Council responses to the Haringey CIL Draft Charging Schedule Consultation Document May – July 2013

London Borough of Enfield	
Representation	Council Response
<p>Recommends that within Enfield there is viability for retail of all sizes to support a £60/m² charge. With Haringey's higher land values (particularly in the west of the borough), this is questioned.</p>	<p>Noted, the Council expects virtually all retail to come forward on existing sites as conversions. Comprehensive redevelopments generating A1 floorspace will be limited, and as such placing a charge on retail is not necessary.</p>
<p>LBE are confused about how the discretionary exemption for projects on the Infrastructure Delivery Plan will work, particularly whether large scale schemes which include IDP projects would be exempt from some or all of the CIL charge.</p>	<p>It is the Council's view that all publically-funded infrastructure should be exempted from CIL. This could alternatively be included in the schedule directly as a nil rate for infrastructural uses.</p>
<p>EBC believe it would be more transparent to include new infrastructure proposals on the Regulation 123 list rather than effectively exempting new projects as they are added to the IDP.</p>	<p>The intention was to ensure projects were place on our IDP by virtue of the qualifying for relief. Consideration will be given to giving a nil rate to infrastructural uses.</p>
<p>The IDP makes no reference to how Haringey fits into the Lea Valley Heat Network.</p>	<p>This can be added to our IDP.</p>
Changes to Charging Schedule	
<ul style="list-style-type: none"> • Add a nil rate for infrastructural uses in preference to excluding infrastructural uses. 	
Alexandra Palace	
Representation	Council Response
<p>No issues, would like to be kept in loop regarding the Infrastructure Delivery Plan, and Alexandra Palace's inclusion in it.</p>	<p>Agreed.</p>
Changes to Charging Schedule	
<ul style="list-style-type: none"> • None 	

Barton Wilmore on behalf of Workspace Management Ltd	
Representation	Council Response
BW have seized on what is a typo in the Council's viability evidence document. Where it should say £100-£200, it reads £100-£20. BW have thus said that the proposed rate of £165 is not evidenced.	Noted, this is a clerical error.
Would like to see exceptional relief made available.	The Council believes that making exceptional relief available is an inefficient manner in which to implement CIL.
Would like a more generous instalments policy introduced.	The Council considers itself to have a range of developments that is reflective of London as a whole, and as such sees no reason to differ from the Mayoral instalments policy.
Would like a review point to be identified.	Review of CIL will happen when values in the East of the Borough change significantly.
Changes to Charging Schedule	
<ul style="list-style-type: none"> • Correct Viability report to change £20 to £200 where necessary • Review point identified as completion of Ward's Corner development 	
CGMS on behalf of London Metropolitan Police	
Representation	Council Response
Concerned that the £50/m ² all other uses rate will catch police operations falling into D1 use.	The DCS exempted all facilities included in the Infrastructure Delivery Plan, and therefore policing would not be charged.
Do not recognise the meeting with the Borough Commander regarding the Infrastructure Delivery Plan.	This is not in itself a problem, but we should work to improve relations, and ensure the nuance of the representation and CIL in Haringey is understood by both sides.
Would like information in the IDP updated to include the most recent Estates Strategy (2013-16).	The Estates Strategy is not very detailed in terms of where new

	facilities will be in Haringey. Specifically the file relating to Haringey's assets failed to open . Perhaps a meeting may enable CGMS or the Met to identify the projects with greater clarity
Changes to Charging Schedule	
<ul style="list-style-type: none"> • Add a nil rate for infrastructural uses in preference to excluding infrastructural uses. 	
Dron & Wright on behalf of London Fire Service	
Representation	Council Response
Believe fire stations and facilities should be excluded from £50/m ² miscellaneous rate.	Agree, and they are offered discretionary relief in the DCS document. This could alternatively be included in the schedule directly as a nil rate for infrastructural uses.
Would like to see a nil rate set for fire facilities.	This will be considered alongside all other infrastructure types. A nil rate will be considered for all infrastructural uses.
Would like specific mention of fire facilities in the list of community infrastructure	Agreed, fire facilities are a type of community infrastructure
Changes to Charging Schedule	
<ul style="list-style-type: none"> • Add a nil rate for infrastructural uses in preference to excluding infrastructural uses. 	
Environment Agency	
Representation	Council Response
Recommends works to the Moselle Brook be included in the IDP.	This can be added as a potential future infrastructure project.
Supports the continued provision of ecological networks in the IDP, and would like to work with Haringey to continue to update these projects. Also recommend that the term Green Infrastructure Improvements is used to reflect the multifaceted nature that green spaces produce.	The Council recognises that green infrastructure such as open space provision, as well as other infrastructures have the potential to make contributions to biodiversity.

Changes to Charging Schedule	
<ul style="list-style-type: none"> Update IDP 	
Future Planning and Development on behalf of Grainger	
Representation	Council Response
Support a nil rate for developments in the East of the borough. The respondent has already secured planning permission, but is concerned about CIL's impact on wider regeneration.	The Council recognises that CIL rates need to be set that are implementable over a wide area, and believe that the rate in the east of the borough does that.
Changes to Charging Schedule	
<ul style="list-style-type: none"> None 	
Greater London Authority	
Representation	Council Response
No issues. Would like to appear at any future Examination in relation to section 14(3) of the CIL regs.	No response.
Changes to Charging Schedule	
<ul style="list-style-type: none"> None 	
NHS Healthy Urban Development Unit	
Representation	Council Response
Health infrastructure projects submitted to be added to the IDP.	The Council notes these and will add them to the IDP.
Expectation that health infrastructure can now be added to the Regulation 123 list.	The Regulation 123 list will be derived from the IDP, based on projects that will be delivered in the coming years.
Changes to Charging Schedule	
<ul style="list-style-type: none"> Update IDP 	
Lee Valley Regional Park	
Representation	Council Response

Supports CIL to be used in creating green links to and from the LVRP.	Agreed, this is a potential use of CIL revenue.
Changes to Charging Schedule	
<ul style="list-style-type: none"> None 	
Mario Petrou (resident)	
Representation	Council Response
Levy revenue should be spent as close to the source development as possible.	The Council recognises that we have had a number of (generally informal) representations of this type from local residents. This is in line with government policy, although not explicitly set out for London Councils in the regulations. At present there is a significant funding shortfall for strategic infrastructure which CIL can contribute towards. The Council is committed to periodically review its Reg123 list, and consultation of this is recommended in CIL Guidance.
Local Residents should have a bigger say than Councillors and officers on how, what, when and where the money is spent.	The Council won't comment on issues on the distribution of fiscal responsibility between local residents and local Government.
Changes to Charging Schedule	
<ul style="list-style-type: none"> Ensure mention of review of IDP and Regulation 123 list is included in the Charging Schedule. 	
North London Waste Authority	
Representation	Council Response
Supports the £0/m ² CIL rate for industrial purposes.	None.
Would like to use CIL receipts to fund waste facilities	The Council has no objection in principle, as waste facilities are critical infrastructure which is linked to growth. It should be noted however that if a waste

	facility serves a number of Local Authorities, funding would expect to be split.
Changes to Charging Schedule	
<ul style="list-style-type: none"> • None 	
Turley on behalf of Travelodge Ltd	
Representation	Council Response
The £50/m ² all other uses rate is not considered justified for hotel developments. Particular emphasis placed on the lack of variation across the borough for this rate.	The Council believe that this response is fully justified, there is no evidence supporting the £50/m ² rate on hotel development. This does not mean that it is not justifiable, but at present the Council has no evidence to suggest what the correct rate for this use is in different areas of the Borough.
There is no evidence to justify the charge.	The Council recognises this, and proposed to remove the miscellaneous rate.
Changes to Charging Schedule	
<ul style="list-style-type: none"> • Remove £50/m² “all other uses” rate. 	
Savills on behalf of Hanover Housing Estate	
Representation	Council Response
<p>Recommends that guidance is provided, and prior to examination, and maximum flexibility is used post regarding:</p> <ol style="list-style-type: none"> How to pay Appeals process Instalments policy Approach to payments in kind Guidance on relief and exceptions What will be charged by S106 	<p>The Council intends to produce guidance in the form of a Planning Obligations SPD.</p> <p>The Council believes that making exceptional relief available is an inefficient manor in which to implement CIL.</p> <p>The Council considers itself to have a range of developments that is reflective of London as a whole, and as such sees no reason to differ from the Mayoral</p>

	<p>instalments policy.</p> <p>The approach to payments in kind are addressed in the Schedule.</p> <p>These are all already included, or will be completed for the examination version.</p> <p>Guidance on what S106 and CIL will cover will be provided in the form of a Planning Obligations SPD.</p>
<p>Recommends inclusion of a projected revenue target linked to the Reg123 list. Additionally New Homes Bonus, and Government Grants should be listed.</p>	<p>The IDP lists costs for the projects which appear in it, where available. There is still uncertainty around what revenue CIL will generate, as it depends on the projects that come forward post adoption of CIL.</p> <p>The Council is unsure what relevance these other pots have on CIL.</p>
<p>Priorities should be identified in the IDP/Reg123 list.</p>	<p>The IDP will provide projects for the Reg123 list. This will be decided through Council processes and feed into future versions of the IDP.</p>
<p>Recommends that a “meaningful proportion” of local revenue is given to local communities</p>	<p>Noted, consideration will be given with regards how this is taken forwards in the Reg 123 list.</p>
<p>Recommends an instalments policy for larger schemes, describing the current instalments policy as suitable for smaller developments.</p>	<p>The Council considers itself to have a range of developments that is reflective of London as a whole, and as such sees no reason to differ from the Mayoral instalments policy.</p>
<p>Believes that 5% would be a high administrative burden.</p>	<p>The revenue reserved for administrative purposes will be collected and spent in line with CIL regulations.</p>

CIL should be reviewed regularly.	Review of CIL will happen when values in the East of the Borough change significantly.
Considers that benchmark land values are incorrect, and need to be reviewed.	The values provided in the evidence are sale values not benchmark values. The Council does not believe that the price land has been sold at historically is a true reflection of the benchmark land value.
Affordable housing values should be confirmed with Borough's preferred Registered Providers.	The Council is comfortable with the viability methodology's affordable housing valuation.
The proposed CIL rates are at the higher end of range recommended by the viability consultant without justification.	The proposed CIL rates are justified in being at the higher end of range recommended by the viability consultant as there is a significant identified infrastructure gap.
Changes to Charging Schedule	
Savills on behalf of Thames Water	
Representation	Council Response
Object to the £50/m ² rate as it may apply to water storage and treatment facilities	Planned infrastructure projects are exempted in the DCS document, and therefore do not need a separate nil rate. Regardless the £50/m ² rate will be reviewed.
Seek an exemption from CIL rate.	Thames Water are a privately owned company providing infrastructure that is essential for growth in Haringey. It is logical therefore that we do not charge CIL on operational infrastructure. They have already made representations seeking release of operational sites for

	divestment into other profit making uses. This type of development should be CIL liable as it increases need for infrastructure.
Changes to Charging Schedule	
<ul style="list-style-type: none"> Remove the £50/m² “miscellaneous” rate 	
Savills on behalf of Tottenham Hotspur FC	
Representation	Council Response
THFC believe that if amendments are made to the scheme (outside of S.73 & S.96A procedures), the development will “potentially” be liable to pay Haringey and Mayoral CIL. THFC concerned that even a low level of CIL will undermine the regeneration of the NDP programme.	The CIL regs do not generally require additional CIL for amendments to permissions unless there is additional floorspace in the development. It is not in the Council’s interests to specifically require longer and more complex planning permissions regarding this development (as noted there is significant co-operation on this scheme).
THFC object to the combined £50/m ² rate for “the most important” regeneration project in Haringey. And point out that the Club and the Council both objected to the £35/m ² Mayoral tariff.	The Council’s objection to the £35/m² rate is broadly consistent with the adding of a low Haringey CIL rate of £15/m ² . If a £15/m ² CIL rate decreases viability significantly, it would likely mean that the development was unviable in the first instance.
THFC are concerned that the full catalytic effects of the Spurs scheme will not be achieved if the £15/m ² rate is enforced.	It is the Council’s role to weigh up the likelihood of developments coming forward against the need for infrastructure. The viability suggests there is a low level of viability in the east of the borough, not no viability in the east of the borough. Without any infrastructure charge at all the full catalytic effect of the North Tottenham redevelopment will

	not be produced. Therefore it is important to set a rate that balances infrastructure provision and development viability.
THFC note that changes to the CIL regulations have been consulted on before and during the DCS consultation window. They advise that the changes will make it simpler to adopt CIL.	These regulations are a consultation and therefore have no effect on the proposed DCS. Additionally there is an exemption for charging authorities whom have already passed through the DCS stage, such as Haringey.
THFC point out that guidance has been released since the Draft Charging Schedule was released, and that changes to the regulations are being consulted on. They would like a delay, and any changes incorporated into the DCS.	This new guidance increases clarity in understanding the CIL regulations. They do not fundamentally alter how CIL operates, or how an examination works. Additionally a delay in the restriction on pooling S106s has not been introduced. A delay is therefore not merited.
THFC do not believe the CIL rate balances the risk of jeopardising development schemes and gaining infrastructure revenue appropriately.	This is the natural conclusion of the above representations, and qualifies as a formal objection. The Council feels that the evidence used to justify this in relation to both the THFC development, and wider Northumberland Park scheme is insufficient to override the Council view that the rate is both viable and fair.
THFC do not believe that sufficient evidence on historical S106 or testing on future strategic sites.	The Council has not yet published a comparison of s106 & CIL. A future Planning Obligations SPD will set out how and what s106 and CIL will be collected for.
THFC do not believe that evidence has been provided specifically demonstrating that the rates proposed will not prejudice the High Rd West masterplan.	The Council believes that the rate of CIL has been set at a level that will allow development to proceed.

THFC do not believe that the current instalments policy allows enough leeway for developers in cashflow terms. A bespoke instalments policy should be introduced for large developments.	The Council considers itself to have a range of developments that is reflective of London as a whole, and as such sees no reason to differ from the Mayoral instalments policy.
THFC would like to see an exceptions policy introduced to increase flexibility in determining developments.	The decision was taken not to offer discretionary exceptions in order to keep CIL as simple as possible. The aim is to reduce the amount of negotiation on planning applications, and introducing discretionary relief would run contrary to this.
THFC would like to see further clarification on the types of development CIL and S106 will be expected to fund.	The DCS document contained a draft Reg123 list, which the completion of the final Regulation 123 list will finalise regarding CIL. A Planning Obligations SPD will set out what all planning obligations are collected for.
THFC recommend a tightened Reg 123 list, with a clear link from the Local Plan to Reg 123 via Infrastructure Delivery Plan.	A final Reg123 list will be provided in the submitted charging schedule. This includes projects from the IDP.
THFC recommend a guidance document to make it clear for developers how, what, when and why they pay CIL and S106.	A future planning obligations SPD would provide the certainty THFC are seeking.
THFC believe that the benchmark land values are set too low, which underestimates the value at which landowners will release land to the market.	It is noted that the asking price for land is higher than our benchmarking. It is considered that the sale prices achieved for land parcels is not the same as a land value benchmark.
It is not clear how the £50/m ² rate has been arrived at.	Agreed.
Viability study does not set out the value of affordable housing included in the appraisals.	Affordable housing percentages are set out in all models. There are values underpinning these. Our consultants can provide

	these.
Changes to Charging Schedule	
<ul style="list-style-type: none"> Remove the £50/m² “miscellaneous” rate 	
Transport for London	
Representation	Council Response
General support for drawing up a Regulation 123 list, including offer for a meeting to help.	Noted.
Changes to Charging Schedule	
<ul style="list-style-type: none"> None 	
Theatres Trust	
Objection to the “all other uses” as it catches sui generis, into which theatres can fall.	Theatres are a profit making enterprise, and therefore this type of development is CIL liable. The promotion of theatre development in Haringey may well be beneficial, and therefore a nil CIL rate may be desirable.
Would support a nil rate for theatres	As above.
Asks whether theatres are applicable for charitable relief?	If the theatre acts as a charity, and does not make any profit, and can demonstrate that it falls into this definition as set out in the CIL regs, it would not be CIL liable.
Whether discretionary relief could be granted	
Applying provisions of D1 Or 2 to sui generis theatres	As the DCS set the same rate for D1, D2 and Sui Generis, this is considered a mute point.
If revenue generated can be returned to the theatre development to achieve revenue neutrality.	If theatres were added to the IDP, they could then they could be placed on the Reg123 list. The Council believes that a theatre school could be considered “infrastructure” but a profit-making theatre would not.

Changes to Charging Schedule	
<ul style="list-style-type: none"> Remove the £50/m² “miscellaneous” rate 	
Turley on behalf of Sainsbury’s supermarkets	
Representation	Council Response
No definition defined for supermarkets or retail warehousing	Agreed, this is an error, one was defined specifically for Supermarkets. It will be added to the submission version of the Charging Schedule.
Evidence does not state why retail is treated differently from warehouse retail or supermarkets. They should therefore be treated the same.	The evidence does differentiate between the uses, so they should not be treated in the same manner given the differences in achieved values on site.
Sainsbury’s would like to see specific targeted testing of strategic sites.	This is included in the April 2013 guidance. It is considered that the Council has tested a range of types of sites in line with CIL regulations and guidance.
Respondent does not believe it will be possible for the charging authority to define whether a supermarket or other A1 use is being developed at the planning application stage, and therefore charge the correct CIL rate.	The Council notes this issue, and believes that it reinforces the need for robust and well funded administration of CIL. The Council believes that in some applications where a range of ground floor uses is proposed, identifying whether a supermarket is present may not be possible. Where a supermarket is proposed as a standalone development, CIL rates will be enforceable.
No consideration of whether charging one rate for supermarkets, and another for other retail, when they sell some of the same goods, is state aid.	The Council does not believe that this is state aid if the definition makes a clear distinction regarding what supermarkets are.
Sainsbury’s do not believe that the evidence provided will meet the changed regulations which	These regulations are draft consultations and the Council

have recently been consulted on by Government.	does not believe that they affect the Charging Schedule.
Believe instalments policy to be too high.	The Council considers itself to have a range of developments that is reflective of London as a whole, and as such sees no reason to differ from the Mayoral instalments policy.
Would like to see an exceptions policy.	The decision was taken not to offer discretionary exceptions in order to keep CIL as simple as possible. The aim is to reduce the amount of negotiation on planning applications, and introducing discretionary relief would run contrary to this.
Changes to Charging Schedule	
<ul style="list-style-type: none"> • Define “Supermarkets” in the Charging Schedule 	
Network Rail	
Representation	Council Response
Would like an exemption from all NR development on basis that it is an infrastructure provider.	The DCS excluded from CIL all infrastructure that is included in the Infrastructure Delivery Plan. It is believed that one new source of retail provision, and potentially residential and commercial development may be above rail stations, particularly Tottenham Hale in Haringey. It is considered that these uses would be CIL liable.
Changes to Charging Schedule	
<ul style="list-style-type: none"> • None 	
Quod on behalf of Berkeley Homes	
Representation	Council Response
The proposed level of CIL charges haven’t been tested properly against the Growth Areas identified	The Council notes that the respondent would like to see an

<p>in Haringey's Local Plan Strategic Policies document, nor against previously achieved Section 106 obligations, as required by the Statutory Guidance</p> <ul style="list-style-type: none"> ○ Site specific tests of viability are required for future development sites ○ Current levels of achieved S106 obligations not set out 	<p>increase in the detail of evidence, and it is proposed that a Planning Obligations SPD is produced. This is not a direct challenge to the rate in the form of specific site analyses. The latest guidance suggests that in addition to area testing (which we have), we should supplement this with site specific testing. For the Site Allocations DPD it would be useful to consider the CIL and S106 impact on future development sites.</p>
<p>For larger sites the proposed rates tend to rely on the lowest land value benchmarks, for industrial land, without taking into account the additional costs associated with bringing such land into use and demonstrating how representative such sites are in the Council's likely housing supply;</p> <ul style="list-style-type: none"> ○ Viability study fails to incorporate abnormal costs ○ Typologies in the viability report are not reflective of development in the borough. 	<p>The Council is comfortable that a suitable range of types of development have been tested. A tolerance has been built in for all costs. The Council does not believe the report should make recommendations based on "abnormal" costs.</p>
<p>The boundaries of the Charging Zones, whilst being broadly reflective of development values in the Borough do not necessarily reflect how values vary within zones and in particular on the boundary of the western and central zones at Haringey Heartlands;</p> <ul style="list-style-type: none"> ○ Consideration of Haringey Heartlands as an area as it crosses charging zones. 	<p>The boundaries in the Charging Schedule are reflective of the areas in which viability was tested. It is noted that the values may vary within each area, but the Council believes that the values are fair and representative, and in all likelihood will have increased since the evidence was produced.</p>
<p>The Draft Regulation 123 list does not provide sufficient information to understand the extent to which Section 106 and 278 obligations will be scaled back and whether the £1,000 per dwelling assumed in the Viability Study is a justified assumption. Further information on this issue is likely to be required before examination.</p>	<p>The Council notes that the respondent would like to see an increase in the detail of evidence, and it is proposed that a Planning Obligations SPD is produced.</p>
<p>Changes to Charging Schedule</p>	
<ul style="list-style-type: none"> • None 	