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Dear Mr Ball,

Thank you for the opportunity to comment on Haringey's Community Infrastructure Levy (CIL): Draft Charging Schedule. As an adjoining local authority, Enfield Council is keen to continue cross boundary partnership working to plan and deliver sustainable growth and regeneration, particularly with regards to infrastructure planning. Officer level comments on the Draft Charging Schedule and Infrastructure Delivery Plan are set out below.

Draft Charging Schedule

It is noted that Haringey propose differential rates for residential uses of £15 in the east, £165 in the central zone, and £265 in the west. £50 per square metre is proposed for D Class uses (non residential institutions and assembly and leisure) and supermarkets and retail warehousing will be subject to a charge of £95 and £25 per square metre respectively. These charges are in addition to the Mayoral CIL of £35 per square metre.

Proposed Retail Charges

The Draft Charging Schedule proposes charges for supermarkets and retail warehousing but a nil charge for 'small scale' retail within the A1 – A5 Use Class. However, the Schedule does not define these forms of retail provision in terms of the size of the floorspace. The floorspace threshold to be applied to supermarkets and retail warehousing should be clarified in the Schedule.

Enfield is currently consulting on its Preliminary Draft Charging Schedule. The viability study supporting Enfield's proposed charges indicates that within Enfield there is viability to support a CIL for retail development, of all sizes, at a rate of £60 per sq m (in addition to the Mayoral CIL of £20 per square metre). Land values are much higher in the west of Haringey compared to Enfield and this tends to improve development viability. We would therefore question why Haringey's viability report concludes that 'small scale' retail is not viable in some or all of the borough. The viability study is not

clear on what evidence sits behind this assumption and this should be explained further.

CIL Exemptions

CIL Regulation 55 allows charging authorities to apply discretionary relief for exceptional circumstances. Paragraph 8.1 of the Haringey Draft Charging Schedule proposes that CIL charges will not be levied on; 'Development delivering projects identified in the Infrastructure Delivery Plan'. However it is unclear how such development will be defined or how this will work in practice. For example, on a complex large scale housing scheme which incorporates community facilities identified in the Infrastructure Delivery Plan would the exemption apply to that part of the scheme which includes only the identified infrastructure or would the whole development be exempt from the CIL charges?

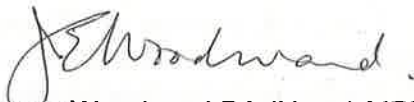
In addition, it is noted that the list of exempt development, could be updated by the Council at any time as part of the update to the Infrastructure Delivery Plan, without being scrutinised at examination. Should the Council proceed with this approach, it would be more transparent for the exempt development to be linked to the approved Regulation 123 list.

Infrastructure Delivery Plan and Regulation 123 List

Many of the infrastructure issues identified in the Infrastructure Delivery Plan relating to health, education, transport, utilities and open space provision are similar to those being faced in Enfield. However, in relation to the Decentralised Energy Network the Infrastructure Delivery Plan makes no reference to how the Haringey element fits into the strategic Lea Valley Heat Network (LVHN) project which is actively being pursued by our respective Councils and the Mayor. It is also unclear if the capital costs identified of £25.2m relate to the wider Lea Valley Heat Network or just that part within Haringey. The Enfield Draft Revised Infrastructure Delivery Plan identifies a figure of £40m for the indicative cost for implementation of the wider sub-regional decentralised energy network.

I hope that the above comments assist in helping you to move the Charging Schedule forward.

Yours sincerely,



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