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Haringey CIL



Head of Planning Policy
Sent by email to: ldf@haringey.gov.uk

David Wilson
E: thameswaterplanningpolicy@savills.com
DL: +44 (0) 118 952 0505
M: +44 (0)7807 999431

Savills,
Ground Floor, Hawker House
Napier Court, Napier Road
Reading, RG1 8BW

savills.com

Dear Sir / Madam

HARINGEY BOROUGH – COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD

Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water in relation to their statutory undertakings.

Thames Water are the statutory water and sewerage undertaker for the Haringey Borough and are hence a "**specific consultation body**" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. In this context we have the following comments on the draft CIL Charging Schedule:

The Draft Charging Schedule Table sets out that it is proposed that Community Infrastructure Levy will be charged at a rate of £50 for "All other uses (including sui generis uses)". Thames Water object to this as it could cover essential water and wastewater/sewerage infrastructure.

Thames Water provide essential water and wastewater infrastructure in order to support growth and deliver environmental improvements. That infrastructure provision can incorporate the provision of buildings such as a new sewage pumping station or new water treatment building for example. The nature of such infrastructure buildings means that there is no impact on other forms of infrastructure requirements such as schools, open space and libraries. We therefore consider that water and wastewater infrastructure buildings should be exempt from payment of the Community Infrastructure Levy.

The purpose of the CIL is to raise funds from developers of new building projects to help fund infrastructure that is needed as a result of development. This includes transport schemes, flood defences, schools, hospitals and other health and social care facilities, parks, green spaces and leisure centres. However, water and wastewater infrastructure is also essential to all new development. Such water and wastewater infrastructure provision is unlikely to put additional pressure on the above mentioned infrastructure.

The Communities and Local Government document entitled "*The Community Infrastructure Levy – An Overview*" sets out that the money raised by developer contributions should be spent in a way that developers feel is worthwhile namely on infrastructure to support development and the creation of sustainable communities. The document also sets out that "*the responsibility to pay the levy runs with the ownership of land on which the liable development will be situated. This is in keeping with the principle that*

those who benefit financially when planning permission is given should share some of that gain with the community. That benefit is transferred when the land is sold with planning permission, which also runs with the land."

The predominant aims of water and wastewater infrastructure development are to support growth (the same aim as the CIL) and to deliver environmental improvements. Consequently, Thames Water do not benefit in the same way as residential or commercial developers through the ability of selling operational sites with planning permission for operational buildings.

Given the aim of new water or wastewater infrastructure buildings are to provide the infrastructure required to support growth or to deliver environmental improvements it is considered that charging the CIL on such water and wastewater developments would be unreasonable.

For the reasons set out above we consider that buildings required for water and wastewater infrastructure provision should be identified as being exempt from paying the CIL and this has been agreed by other London Boroughs.

The Council may however wish to consider using CIL contributions for enhancements to the sewerage network beyond that covered by the Water Industry Act and sewerage undertakers, for example by providing greater levels of protection for surface water flooding schemes. Sewerage undertakers are currently only funded to a circa 1:30 flood event.

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Wilson', with a stylized flourish at the end.

David Wilson BA (Hons), BTP, MRTPI
Associate Director Planning