

## Consultation Statement

### Response to Consultation on the Harrow Draft Charging Schedule (Regulation 16)

March 2013

# LDF

Local Development Framework

## 1. Introduction

- 1.1 Consultation on the Harrow Community Infrastructure Levy (CIL) Draft Charging Schedule took place between 15<sup>th</sup> November and 20<sup>th</sup> December 2012. Consultation was undertaken in accordance with the Council's Statement of Community Involvement and in line with the requirements of Regulation 16 of The Community Infrastructure Levy Regulation 2010, as amended.
- 1.2 This Consultation Statement provides a summary of the consultation undertaken, highlights the main issues raised and the Council's response to these matters.
- 1.3 This Consultation Statement should be read in conjunction with the Regulation 15 Consultation Statement, which outlines the representations made to consultation on the Preliminary Draft Charging Schedule and the Council's consideration and response to these. The Regulation 15 Consultation Statement is available on the Council's website:  
[http://www.harrow.gov.uk/info/856/local\\_development\\_framework\\_policy/2677/community\\_infrastructure\\_levy\\_cil/3](http://www.harrow.gov.uk/info/856/local_development_framework_policy/2677/community_infrastructure_levy_cil/3)

## 2. Summary of consultation undertaken on the Draft Charging Schedule

- 2.1 Having had regard to the representations made to Harrow's Preliminary Draft Charging Schedule, Harrow's Cabinet considered a report on the Draft Charging Schedule at its meeting of 11<sup>th</sup> October 2012  
<http://www.harrow.gov.uk/www2/ieListDocuments.aspx?CId=249&MId=61072&Ver=4>. At that meeting Cabinet approved the Draft Charging Schedule for consultation for a period of four weeks.
- 2.2 Formal notification of the Harrow CIL Draft Charging Schedule was given on 15<sup>th</sup> November 2012, and representations were invited for a period of four weeks ending 20<sup>th</sup> December 2012. A formal notice setting out the proposals matters and representations procedure was placed in the 'Harrow Observer' newspaper on the 15<sup>th</sup> November 2012 (see **Appendix A**). In addition, on 15<sup>th</sup> November 2012 a total of 1,048 letters (see **Appendix B**) were sent by post or email to all contacts on the LDF database (see **Appendix C**), including all specific and appropriate general consultation bodies. Included with the letters, and placed on the website, was a 'Statement of Representations Procedure' (see **Appendix D**). Those emailed were also provided with the web link to the documents on the Council's consultation portal and LDF web pages.

2.3 Hard copies of the Harrow CIL Draft Charging Schedule Report, the Viability Study (BNP Paribas, July 2012), Harrow Council's Infrastructure Assessment & Delivery Plan (updated June 2012), the Infrastructure Report (CIL Knowledge, July 2012) and the Statement of Representation Procedure were made available at the Harrow Civic Centre (Access Harrow) and all libraries across the Borough. The documents were also made available to view and download from the LDF web pages of the Council's website and via the Council's consultation portal.

2.4 A week prior to the close of consultation a reminder email and letter were sent out to those on the LDF consultation database to remind people of the closing date for making their comments.

### **3. Duty to Cooperate**

3.1 Section 110 of the Localism Act inserts section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed.

3.2 The other persons prescribed are those identified in regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The bodies prescribed under section 33A(1)(c) are:

- (a) the Environment Agency;
- (b) the Historic Buildings and Monuments Commission for England (known as English Heritage);
- (c) Natural England;
- (d) the Mayor of London;
- (e) the Civil Aviation Authority;
- (f) the Homes and Communities Agency;
- (g) each Primary Care Trust
- (h) the Office of Rail Regulation;
- (i) Transport for London;
- (j) each Integrated Transport Authority;
- (k) each highway authority and
- (l) the Marine Management Organisation.

3.3 The duty imposed to co-operate requires, in particular, that each person, including a local planning authority, to:

- (a) to engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
- (b) to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).

- 3.4 The duty under section 33A(2) Planning and Compulsory Purchase Act 2004 applies to the preparation of development plan documents, and activities which prepare the way for and which support the preparation of development plan documents, so far as relating to a strategic matter such as CIL and the funding of infrastructure required to support new development.
- 3.5 The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the Harrow CIL, following the approach set out in the NPPF. The mechanisms for and evidence of cooperation and engagement is set out in the table below.

Public Body	Council's Engagement and Cooperation
Local Planning Authorities & County Councils	<p>The production of CIL charging schedules is a standing item on the West London Alliance (WLA) Planning Policy Officers meeting agenda. The WLA includes representatives from Harrow, Hillingdon, Ealing, Brent, Hammersmith &amp; Fulham, and Hounslow councils. The Planning Officers Group has an agreed TOR. Although Barnet are not part of the WLA, they often attend the meetings given their relationship with Harrow and Brent. Early discussions considered the possibility of preparing a joint West London CIL. However this option was not considered feasible given that each of the boroughs are at very different stages in preparing their Core Strategy and evidence base, and that to do a join CIL would require some to delay their CIL timetable, which was not considered a suitable proposition. Other options were also explored including the use of a standard brief; a standard approach to rate setting; consistency in consultants used etc but on balance it was agreed that the most suitable approach would be for each authority to give a briefing update at each meeting to keep the others informed of proposed rates, consultation dates, issues raised and how these were being addressed, as well as to share experience on such matters as the effectiveness of the consultants used and the scope of their involvement; strategic infrastructure planning; CIL systems and administration requirements; staffing etc. The last meeting was held 17 January 2013 and which all boroughs, including Harrow, gave an update on proposed rates, timetables and issues (the minute of this meeting is provided at <b>Appendix E</b>). With regard to Harrow's proposed rates, no concerns were raised.</p> <p>In addition to briefing updates via WLA, both Harrow and Hillingdon councils regularly attend a meeting of the Hertfordshire and Buckinghamshire councils (Three Rivers, St Albans, Dacorum, Watford, Hertsmere, Chiltern and South Bucks) to discuss cross-boundary matters, potential for joint working and to update each other on local plan development and recent experiences. Our last meeting was held on 16 July 2012, where each borough gave an update on CIL – no concerns were raised regarding Harrow's proposed CIL rates (the minute of this meeting is provided at <b>Appendix F</b>).</p> <p>Upon publication of Harrow's DCS, all neighbouring local authorities were formally sent notification, however only Hertsmere Borough Council took the time to respond and then only to confirm that they have no comment to make. The Council will continue to update its neighbouring authorities on progress with its CIL through the sub-regional forum meetings and will continue to formally notify them of consultation.</p>
The Environmental Agency	<p>The Environment Agency has been heavily involved in the scrutiny and review of Harrow's SFRA work, including proposals for on and off-site mitigation, especially in relation to Wealdstone town centre. The EA gave their formal support towards a Core Strategy policy proposal to deculvert the Wealdstone Brook through Kenton Recreation</p>

Ground and to other proposals associated with Queensbury Rec and Stanmore Marsh, and have supported the inclusion of these projects within the Council's IDP to be funded in part of wholly through CIL.

The EA was formally notified of publication of Harrow's DCS but did not make a representation. There are currently no grounds identified that warrant more active engagement between the parties.

The Historic Buildings & Monuments Commission

The conservation, management and maintenance of Harrow's historic buildings and scheduled monuments are considered by the Council to be site/asset specific matters rather than strategic infrastructure to be covered by CIL. They therefore continue to fall within the remit of Section 106 agreements for private assets and site specific mitigation and management requirements or the Council's own asset management plans, where such assets are located within public land. As such, other than notifying the Historic Buildings & Monuments Commission of the publication of the Harrow CIL DCS, the Council has not sought more active engagement with this particular body. It should be noted that no representation was received to the DCS from this body and therefore the Council can only conclude that they are content with Harrow's proposals. The Council will continue to notify the Commission but there are currently no grounds identified that warrant more active engagement between the parties.

Natural England

Natural England (NE) has and continues to be engaged in the preparation of Harrow's various local planning policy documents. As part of the formal submission and examination of the Harrow Core Strategy, NE was consulted on Harrow IDP. While NE made formal representations to the Core Strategy and to other evidence base documents, including the Sustainability Appraisal and Habitats Impact Assessment, they did not make comment to the detail or content of the IDP. The Council therefore considered that NE was content with the assessment findings and the infrastructure requirements identified therein. On the basis of previous engagement, in respect of preparing the Harrow CIL DCS, the Council did not seek more active engagement with this particular body. However, NE was formally notified of publication of both the preliminary and draft charging schedule and has made representations to both seeking alignment with environmental initiatives proposed in the Local Plan and CIL funding for delivery. The Council will therefore continue to engage with NE over the production and implementation of the Harrow CIL and seek to address the issues raised by NE through this process.

Mayor of London

The Mayor of London has been engaged in the production of Harrow's planning policy documents. In 2010 Harrow Council and the Mayor agreed a GLA policy officer secondment to assist with the application of London Plan policy at the Local Plan level, including the production of a joint AAP. The secondment has helped to facilitate two-way working between the two authorities and is programmed to continue for the foreseeable future. The GLA has also made a design specialist available to the Council to assist in alignment of the Harrow Green Grid project with that of the London-wide project and to assist in the design of urban realm improvements. These elements now form a significant part of the IDP and have attracted successful bid funding for delivery via the Mayors Outer London Fund rounds 1 & 2.

The GLA were formally notified of the publication of both the preliminary and draft charging schedules, and made representations to both welcoming the fact the Mayor's Crossrail CIL levy has been taken into account by the Council in its viability assessment and in the establishment of the Harrow CIL rates. The comments received indicate that the Mayor is content with Harrow's CIL proposals. The Council will therefore continue to formally

notify the Mayor of the progress being made on the Harrow CIL.

Local Enterprise Partnerships	There is only one LEP in London - the Mayor of London's pan-London partnership, which is managed by the GLA. It received Government approval in February 2011 and was established to contribute to the delivery of the Mayor's Economic Development Strategy. The Council's active and on-going engagement with the Mayor of London (the GLA) is therefore considered by the Council to satisfy engagement with this prescribed body as set out in the Regulations.
Civil Aviation Authority	Other than formal notifications, the Council has had little engagement with the CAA over the development of its Local Planning Policies. The CAA was formally notified of publication of Harrow's DCS but did not make a representation. The Council will continue to notify the CAA but there are currently no grounds identified that warrant more active engagement between the parties.
Homes and Communities Agency	The HCA were represented on the both the Council's Steering Panel and Office Working Group for the production of the Harrow and Wealdstone Area Action Plan. A key role of the HCA was to assist the Council in understanding the viability implications associated with introduction and application of the affordable rent model as well as potential HCA funding streams. As such the HCA provided significant input into the brief for the commissioning of the Viability Study undertaken to support the Harrow Core Strategy, which has subsequently been the subject of review and updating to inform the Harrow CIL DCS. However, the Mayor of London has now taken over the responsibilities of the HCA within London, so our engagement with HCA functions is now undertaken as part of our engagement with the Mayor of London (see comments above).
PCT	Harrow PCT is a Member of the Harrow Local Strategic Partnership, alongside the Council and other key agencies. At the Strategic level the Council and the PCT work together to help promote good health amongst residents and to support vulnerable people who are eligible for social care. With regard to local planning and the CIL Council's planning policy officers have meet with the PCT on many occasions over the years to understand key health issues facing the borough, the need/demand/levels and specific requirements for new healthcare provision to serve existing and new communities and Harrow's changing demographics, as well as the PCT's proposed capital and estates strategies for the Borough. Unfortunately, the reforms to the NHS have impacted upon this relationship over the past year with the commissioning of local healthcare services now being devolved to local GPs. While the Council has actively sought to engage GPs, this continues to be on a one to one basis rather than with a GP consortium, and therefore has not been overly effective as yet in informing any review or update of the IDP. While the Council will continue to notify and consult the Harrow PCT and all known local GPs and health providers on such matters as local planning and publication of the Harrow CIL DCS, it is likely to take time for these radical reforms to bed in and for more effective engagement to be achieved. No representations were received by bodies representing the health sector to the DCS.
Office of Rail Regulation	Other than formal notifications, the Council has had little engagement with the Office of Rail Regulation over the development of its Local Planning Policies. The Office of Rail Regulation was formally notified of publication of Harrow's DCS but did not make a representation. The Council will continue to notify the Office of Rail Regulation but there are currently no grounds identified that warrant more active engagement between the parties.

Transport for London	<p>TfL have been engaged both in the review of the Council's Transport Audit study and more recently in commissioning on behalf of the Council, a Transport Assessment of road and junction capacity associated with planned growth within the Harrow and Wealdstone Intensification Area. The findings of both studies have informed the IDP underpinning the CIL infrastructure requirements. TfL continue to be represented on the Office Working Group for the production of the Harrow and Wealdstone Area Action Plan. The Council hopes to continue its joint working with TfL post adoption of the AAP to continue to refine the potential transport mitigation measures to be employed for specific sites/junctions as well as in the design, costing, funding and delivery of station improvements. Such information will be important in any review of the CIL in coming years.</p> <p>TfL were directly notified of the publication of the Harrow CIL DCS but did not make a representation. The Council will continue to notify TfL, and will continue to seek TfL engagement in the preparation of Harrow's Local Plan documents and the CIL, and the supporting transport infrastructure requirements. Where appropriate, the IDP will be updated to reflect such engagement.</p>
Highway Authority	<p>Harrow Council and TfL are the Highways Authority within Harrow. See comments above re engagement of TfL. Nevertheless, the Council has and continues to notify the Highway Agency of consultation on its development plan documents and infrastructure planning, including the CIL.</p> <p>The Highways Authority was formally notified of publication of both the preliminary and draft charging schedules and made representations to both stating they had no comment. The Council will continue to notify the Highways Authority but there are currently no grounds identified that warrant more active engagement between the parties.</p>
Marine Management Organisation	<p>Other than formal notifications, the Council has had little engagement with the Marine Management Organisation over the development of its Local Planning Policies. The Marine Management Organisation was formally notified of publication of Harrow's DCS but did not make a representation. The Council will continue to notify the Marine Management Organisation but there are currently no grounds identified that warrant more active engagement between the parties.</p>

#### 4. Who responded and number of representations received

4.1 12 consultation responses were received to the Harrow CIL Draft Charging Schedule - four representing statutory bodies; three from the development industry; two representing service providers; two from local amenity groups; and one from an adjoining local authority. Table 3.1 below provides a full list of the respondents. The individual comments made, the Council's detailed consideration and response to these by the Council is provided in the Table at **Appendix G**.

Table 3.1: List of Respondents to the Harrow CIL Preliminary Draft Charging Schedule Consultation

ID no.	Respondent	ID no.	Respondent
1	Campaign for a Better Harrow Environment	8	Highways Agency

ID no.	Respondent	ID no.	Respondent
2	CGMS Consultants on behalf of Metropolitan Police	9	Home Builders Federation
3	Gerald Eve LLP on behalf of Signature Senior Lifestyle	10	Natural England
4	English Heritage	11	Thames Water
5	Greater London Authority	12	Turley Associates on behalf of Sainsbury's
6	Hatch End Association	13	Mr Collins – Middlesex Property Development Ltd
7	Hertsmere Borough Council		

## 5. Summary of main comments / issues raised and Council's response to these

- 5.1 The following section provides a summary of the main issues raised through consultation on the Draft Charging Schedule. The detailed representations, and Council officer's consideration and response to these, is set out at **Appendix G**.
- 5.2 Of the 13 representations received, two responses simply acknowledged the fact they had been consulted but had made no comment to make on Harrow's proposed Draft Charging Schedule, seven were in support and four opposed.
- 5.3 Of the representations in support, those made by the service providers (the MET Police and Thames Water) both sought to ensure their community/physical infrastructure would be exempt from CIL liability and that such infrastructure could be included in the Regulation 123 list. The representation of Natural England sought to ensure CIL would be used to deliver the borough's approach to the protection, enhancement and creation of networks of biodiversity and green infrastructure, while that of English Heritage requested the Council to consider discretionary relief in respect of development affecting heritage conservation. The representation of the GLA welcomed the fact that the setting of rates in Harrow's charging schedule had taken into account the Mayoral CIL rate applicable to the Borough. Of the two representations received from local community groups, the one by the Hatch End Association sought reference to neighbouring borough CIL rates, while that of Campaign for a Better Harrow Environment sought clarity on why the Council was not proposing a differential charge for residential development in areas of the Borough that could, based on the viability evidence, carry a higher charge.
- 5.4 All four of the representations opposing the rates proposed in the draft charging schedule came from the development or commercial sector. All sought to query the viability evidence supporting the rates, which they considered would make development unviable or would impact upon affordability.
- 5.5 Having considered each of the representations in detail, the Council does not consider that any modifications to the draft charging schedule are required. The Council's reasoning for arriving at this conclusion are set out in detail at **Appendix G**.

# Appendix A – Public Notice of the Harrow CIL Draft Charging Schedule consultation

Thursday, November 15, 2012

vobserver.co.uk

## Brent

### COUGH OF BRENT Planning Act 1990 Buildings & Conservation Act 1990

### Planning (General Procedure) Order 2009

Application has been made in  
respect of the following

description of proposal  
**Wembley, HA0 3JF**  
Rear door to porch with upvc  
of dwellinghouse  
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**Wembley, HA0 3JF**  
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partial demolition works to the  
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### Community Infrastructure Levy Regulations 2010 (as amended)

### Notice of Consultation on a Draft Charging Schedule (Regulation 16)

In accordance with Regulation 16(d) of the Community Infrastructure Levy Regulations (2010), Harrow Council hereby gives notice of the publication of consultation on a draft charging schedule.

**Title of documents:**  
Harrow Community Infrastructure Levy - Draft Charging Schedule

**Subject matter:**  
The Draft Charging Schedule is the main component of a Community Infrastructure Levy for the Borough, and sets out the charges (per sqm) that will be levied on certain types of development to fund essential infrastructure.

**Area covered:**  
Harrow's Community Infrastructure Levy will apply Borough wide.

**Period within which representations must be made:**  
Representations can be made over the six week publication period, beginning on

**Thursday 15th November 2012 and ending on Thursday 20th December 2012.**

**Where have the documents been made available, and the places and times at which they can be inspected:**

The Draft Charging Schedule and supporting documentation are available for inspection at the following locations:

- Council's website: [www.harrow.gov.uk](http://www.harrow.gov.uk)
- Council's consultation portal: <http://harrow-consult.objective.co.uk/portal>
- Access Harrow: The Civic Centre 1, Station Road, Harrow, HA1 2XF
- at all Harrow Libraries (the details of which can be found below)

Address	Opening Times	Address	Opening Times
<b>Civic Centre Reference Library</b> Station Road, Harrow, HA1 2UU	Mon - Thurs 9.30 - 8.00pm Fri 9.30 - 5.30pm Sat 9.00 - 5.00pm	<b>Pinner Library</b> Marsh Road, Pinner HA5 5NQ	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm
<b>Gayton Central Lending Library</b> Garden House, 5 St John's Road, Harrow, HA1 2EL	Mon - Thurs 9.30 - 8.00pm Fri 9.30 - 5.30pm Sat 9.00 - 5.00pm	<b>Rayners Lane Library</b> 226 Imperial Drive, Rayners Lane, HA2 7HJ	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm
<b>Bob Lawrence Library</b> 5-8 North Parade, Mollison Way, Edgware, HA8 5QH	Mon - 9.00 - 5.30 pm Tues, Thurs 9.00 - 8.00 pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm	<b>Roxeth Library</b> Northolt Road, South Harrow, HA2 8EQ	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm
<b>Hatch End Library</b> Uxbridge Road, Hatch End HA5 4EA	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm	<b>Stanmore Library</b> 8 Stanmore Hill, Stanmore, HA5 3BQ	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm
<b>Kenton Library</b> Kenton Lane, Kenton, HA3 8UJ	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm	<b>Wealdstone Library</b> The Wealdstone Centre, 38/40 High Street, Wealdstone, HA3 7AE	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm
<b>North Harrow Library</b> 429-433 Pinner Road, North Harrow, HA1 4NH	Mon - 9.00 - 5.30pm Tues, Thur 9.00 - 8.00pm Weds Closed Fri 9.00 - 1.00pm Sat 9.00 - 5.00pm		

### Making a representation:

The Council welcomes comments on the Draft Charging Schedule. At the close of consultation, responses will be submitted to an approved examiner, alongside the Charging Schedule, for an independent examination. If responding, you may request to be notified of the examination, and to be notified of the outcome of the examination. You can also request to be heard by the examiner at the examination.

Representations can be made:

- through the on-line consultation portal at: <http://harrow-consult.limehouse.co.uk>;
- by email at: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk);
- by post to: LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Harrow, HA1 2UY;
- by fax to: 020 8424 8151

Please note that all representations received will be made publicly available.

**Comments must be received by 5pm on Thursday 20th December 2012.**

For any further enquiries, please email [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or contact the LDF Team on

Tel. 020 8736 6068

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## Appendix B – Letter of Notification sent to consultees on the LDF database



Graham Saunders  
English Heritage (London Region),  
1 Waterhouse Square  
138-142 Holborn  
London  
EC1N 2ST

Place Shaping  
Andrew Trehem  
Corporate Director

15<sup>th</sup> November 2012

Dear Sir / Madam,

### Harrow Community Infrastructure Levy (CIL) – Draft Charging Schedule Public Consultation 15<sup>th</sup> November to 20<sup>th</sup> December 2012

Harrow Council is preparing a local charge on certain types of development to help fund the provision of infrastructure in the Borough, in accordance with the Community Infrastructure Levy Regulations 2010 (as amended). Consultation on a preliminary charging schedule (Regulation 15) was carried out from 10<sup>th</sup> August until 21<sup>st</sup> September 2012. The Council has now published for consultation the draft charging schedule (Regulation 16) that it intends to submit to the Planning Inspectorate for independent Examination in Public.

The draft charging schedule rates are shown in the table below.

#### Harrow Draft Charging Schedule – Rates of CIL

Use	Charge per sqm
Residential (Use Classes C3),	£110
Hotel (Use Class C1), Residential Institutions, except Hospitals, (Use Class C2), Student Accommodation, Hostels and HMOs (Sui Generis)	£55
Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants & Cafes (Use Class A3), Drinking Establishments (Use Class A4), Hot Food Take-aways (Use Class A5)	£100
All other uses	Nil

The above charges will apply across all of Harrow, and are exclusive of the Mayoral CIL of £35 per sqm.

The Draft Charging Schedule and relevant evidence can be viewed online at:

- [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf)
- [http://harrow.limehouse.co.uk/portal/planning/harrow\\_community\\_infrastructure\\_levy/draft\\_charging\\_schedule](http://harrow.limehouse.co.uk/portal/planning/harrow_community_infrastructure_levy/draft_charging_schedule)

Hard copies of the Draft Charging Schedule are available at Harrow Civic Centre (duty planner office) and at the Borough's libraries (details of locations and opening times can be found on the Council's website: <http://www.harrow.gov.uk/libraries>).

Representations may be made in writing:

- by e-mail to: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or
- by letter to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Harrow, HA1 2UJ

Representations may include a request to be heard by the Planning Inspector at the Examination in Public and may include a request to be notified:

- i. that the draft charging schedule has been submitted to the Planning Inspectorate;
- ii. of the publication of the recommendations of the Planning Inspector and the reasons for those recommendations; and
- iii. of the approval of the charging schedule by the Council.

Please note that comments cannot be treated as confidential. They will be made available as public documents.

It is anticipated that the Examination in Public will take place during the Spring 2013.

For any queries please telephone the LDF Team on 020 8736 6082 or e-mail [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

Representations must be received no later than 5pm on Thursday 20<sup>th</sup> December 2012.

Yours faithfully,

Matthew Paterson  
LDF Team Leader  
Harrow Council

## Appendix C – List of Contacts on the LDF Database

Moderation	Dron & Wright Property Consultants	London Waste Regulatory Authority
Home Office	London Fire & Emergency Planning Authority	A2 Dominion
Fields in Trust (FIT)	London Green Belt Council	London Wildlife Trust
Nursing Services	London Middx Archaeological Society	Age Concern Harrow
Metropolitan Public Gardens Association	London Natural History Society C/o British Museum (Natural History)	Planning Advisory Service
Office of Government Commerce	Edgware & Burnt Oak Chamber of Commerce	Martineau UK
Police Architectural Liaison Officers/Crime Prevention Design Advisors	Farmers Union	Commission for Architecture and the Built Environment(CABE)
London Borough of Brent	Forestry Commission East England Conservancy	National Federation, Gypsy Liaison Group
Department for Culture Media & Sport	London Tourist Board	Acton Housing Association
Department for Education and Skills	Hertfordshire County Council	Home Group
Harrow Health Authority	Hertsmeare Borough Council	Catalyst Communities Housing Group
Elstree and Borehamwood Town Council	Westminster City Council	West London YMCA
Elstree District Green Belt Society	Royal Mail Letters Planning & Legislation Unit	Metropolitan Police
Department for Environment, Food and Rural Affairs	The Society for the Protection of Ancient Buildings	Ealing Council
Department of Constitutional Affairs	Department for Business, Enterprise and Regulatory Reform (BERR)	Barnet Council
Department of Works and Pensions (DWP)	The House Builders Federation	Three Rivers District Council
Department for Business, Enterprise & Regulatory Reform	Sport England	Harrow East Constituency Conservative Party Assembly Member for Brent & Harrow & LDF Panel Member
London Borough of Camden	Sport England (Greater London Region)	Gareth Thomas MP for West Harrow
Council for the Protection of Rural England(Harrow)	Watford Borough Council	Bob Blackman MP for East Harrow
Council for British Archaeology	Watford Rural Parish Council	Harrow Churches Housing Association
Mark Dowse (Crime Prevention)	Health & Safety Executive	Circle Anglia
Vodafone LTD	Health Services Board	Family Mosaic Housing
Transport for London	Nature Conservancy Council	Chiltern Hundreds Charitable Housing Association Ltd
Transport for London Strategy Group	Network Rail	Dimensions (UK) Limited
London Borough of Haringey	Great Minster House	Jewish Community Housing Association
London Borough of Hillingdon	Group Property and Facilities	John Grooms Housing Association
Brent & Harrow Chamber of Commerce	Property Services Agency	Home Group Limited
BAA Aerodrome Safeguarding	Rail Freight Group	Genesis Housing Group (PCHA Maintenance)
The Civic Trust	Road Haulage Association	Pathmeads Housing Association Ltd
Civil Aviation Authority Safety Regulation Group	Iceni Projects	Genesis Housing Group
London Borough of Hounslow	GLA Biodiversity Group Strategy Directorate	

London Councils  
London Development Agency  
Harrow and Hillingdon Geological Society  
Shepherds Bush Housing Association Limited  
Paddington Churches Housing Association Ltd  
Paradigm Housing Association  
Housing Corporation  
Chiltern Hundreds Housing Association (Paradigm Housing Group)  
Shepherds Bush Housing Association Limited  
Stanmore Christian Housing Association Limited  
Peabody Trust  
The Abbeyfield Harrow Society Limited  
The Guinness Trust  
Innisfree Housing Association  
Sutherland Housing Association Limited  
Inquilab Housing Association Limited  
Haig Homes  
Anchor Trust  
Apna Ghar Housing Association Limited  
Network Housing Group  
Origin Group  
Home Builders Federation  
CB Richard Ellis  
Nathaniel Lichfield and Partners  
  
URS Corporation Ltd  
WYG Planning & Design  
Tribal  
Tym & Partners  
  
CGMS Consulting  
DP9 Town Planning Consultants  
MEPK Architects  
Metropolis PD  
Octavia Housing  
Metropolitan Housing Trust Limited  
Notting Hill Housing Trust

London Underground  
Harrow Hill Chamber of Commerce  
London Underground Limited Infrastructure Protection  
Drivers Jonas  
RPS Group Plc  
Pro Vision Plann & Design  
DPDS Consulting Group  
Dalton Warner Davis  
  
Oxalis Planning  
Andrew Martin Associates  
Barton Willmore  
WS Planning  
PB  
Turley Associates  
GL Hearn Property Consultants  
The London Planning Practice  
Halcrow Group  
Urban Initiatives  
Brown Associates  
Strategic Leisure  
Capita Symonds  
Knight, Kavanagh & Page  
MWH Global  
Gregory Gray Associates  
  
First Plan  
Daniel Rinsler & Co  
Yurky Cross Architects  
Jones Lang LaSalle  
UK Planning Manager  
Dandara Ltd  
Saunders Architects LLP  
Savills  
Alsop Verrill  
Colliers CRE  
CB Richard Ellis Ltd  
Berkeley Homes

Home Group (Regional Development Director)  
Dimensions (UK) Limited  
Housing 21  
Warren House Estate Residents Association  
Worple Residents Association  
Augustine Area Residents and Tenants Association  
Roxbourne Action Group (RAG)  
Aylwards Estate Residents' Association  
  
Canning Road Residents Association  
Cannons Community Association  
Canons Park Estate Association  
Canons Park Residents Association  
Alexandra Avenue(Newton Farm) Tenant's Association  
Barrowdene Residents Association  
Belmont Community Association  
Arrowhead Parade Tenants & Residents Association  
Bentley Priory Residents Association  
Bentley Way Association  
Blenheim Road Action Group  
Brookshill Residents Association  
Afganstan Housing Association  
Cherry Croft Residents Association  
Chichester Court Association  
Claire Court, Elm Hatch, Cherry Croft Residents Association  
Claire Gardens Residents Association  
Colman Court Residents Association  
Copley Residents Association  
Waxwell Close Association  
Wealdstone Residents Action Group  
Wemborough Residents Association  
West Harrow Residents Association  
Corbins Lane Residents Assoc.  
Cottesmore Tenants & Residents Association  
Crown Sreet & West Sreet Area Residents Association  
Cullington Close Tenants Association  
Dalkeith Grove Residents Association

Housing 21  
Stadium Housing Association Limited  
Servite Houses  
LHA-ASRA Group  
Veldene Way Residents Association  
Victoria Terrace Residents Association  
Elmwood Area Residents' Association  
Elstree Village Association  
Gayton Residents Association  
Harrow Weald North Residents Association  
Harrow Weald Tenants and Residents Association  
Thurlby Close Residents Association  
Tyrell Close Tenants Association  
Gleneagles Tenants Association  
Golf Course Estate Association  
Atherton Place Tenants' Association  
South Hill Estates Harrow Ltd  
Herga Court Residents Association  
Gordon Avenue Residents Association  
Hobart Place Residents Association  
Grange Farm Residents Association  
Greenhill Manor Residents Association  
Greenhill Residents Association  
Greville Court Residents Association  
Grove Tenants & Residents Association  
Hardwick Court Maisonettes Association  
Jubilee Close & James Bedford Close Residents Association  
Kenmore Park Tenants and Residents Association  
Kenton Area Residents Association  
Honeybun Tenants Association  
Sonia Court Residents Association  
Rowlands Avenue Residents Association  
Roxborough Park Residents Association  
Roxborough Residents Assoc.  
Roxborough Road Residents Association  
Rusper Close Residents Association

Cluttons LLP  
DTZ  
Elm Park Residents' Association  
Wilton Place Residents Association  
Rayners Lane Tenants & Residents Association  
South Harrow & Roxeth Residents Association  
The Clonard Way Association  
The Cresnet Residents Association  
South Hill Estates Residents Association  
South Hill Residents Association  
South Stanmore Tenants & Residents Association  
Lodge Close Tenants Association  
Pinnerwood Park Estate Residents Association  
Merryfield Court Residents Association  
Pinner Road & The Gardens Residents Association  
Pinnerwood Park C.A. Residents Association  
Manor Park Residents Association  
Letchford Terrace Residents Association  
Laburnum Court Residents Association  
Laing Estates Residents Association  
Hardwick Close Flats Association  
Harrow Civic Residents Association  
Oak Lodge Close Residents Association  
Harrow Federation of Tenants & Residents Associations  
Pinner Green Council Tenants Association  
Pinner Hill Residents Association  
Pinner Hill Tenants & Residents Association  
  
Nicola Close Residents Association  
Orchard Court Residents Association  
South West Stanmore Community Association  
Princes Drive Resident Association  
Priory Drive Residents Association  
Sheridan Place Residents Association  
Northwick Manor Residents' Association  
Nugents Park Res Association  
Mount Park Residents Association

Daneglen Court Residents Assoc  
East End Way Residents Association  
Edgware Ratepayers Association  
Elizabeth Gardens Tenants Association  
Roxbourn Action Group (RAG)  
Kenton Forum  
Winton Gardens Residents Association  
Wolverton Road Tenants Association  
Cambridge Road Residents Association  
Brockley Hill Residents Association  
Aerodrome Householders Association  
Woodcroft Residents Association  
Woodlands Community Association  
Woodlands Owner Occupiers  
Roxeth First & Middle School  
Pinner & District Community Association  
Raghuvanshi Chartiabale Trust  
Eastcote Conservation Panel  
Post Office Property Holdings  
Stanmore Golf Club  
Stanmore Society  
St Anselm's RC Primary School  
Sheepcote Road Harrow Management Company Ltd  
Iraqi Community Association  
Jehovah's Witnesses  
John Lyon School  
Roxeth Mead School  
  
Royal Association in Aid of Deaf People  
Royal National Institute For The Deaf  
Kenton Lane Action Group  
Kerry Court Residents Greensward Properties Ltd  
Grimsdyke Golf Club  
Stanmore Chamber of Trade  
Herts & Middx Wildlife Trust  
Tempsford Court Management Company Ltd  
Wembley Rugby Club

Queensbury Circle Tenants Association  
The Pinner Association  
The Pynnacles Close Residents Association  
Sudbury Court Residents Association  
Eastcote Village Residents Association  
Rama Court Residents Association  
Harrow Heritage Trust, Harrow Museum & Heritage Centre  
The London Playing Fields Society  
The National Trust West Middlesex Centre  
The Ramblers Association - North West London Group  
Harrow Natural History Society  
Harrow Nature Conservation Forum  
Harrow Partnership for Older People (P.O.P)  
Friends of the Earth - Harrow & Brent Group  
Hatch End Cricket Club  
Estates Bursar Harrow School  
Bursar, Harrow School  
Orley Farm School  
The Twentieth Century Society  
The Victorian Society  
Harrow Association for Disability  
Harrow Association of Voluntary Service  
Harrow Athletics Club  
Dove Park Management Co  
West Harrow Action Committee  
Wealdstone Active Community  
Clementine Churchill Hospital  
Harrow Healthy Living Centre  
Hatch End Swimming Pool  
Whitmore Sports Centre  
Christ Church  
Cygnet Hospital Clinic  
Flash Musicals  
Pinner Wood Children's Centre  
Gange Children's Centre  
The Garden History Society

Harrow Hill Residents Association  
Hatch End Association  
The Waxwell Close Association  
Hathaway Close Residents Association  
Abchurch Residents Association  
Hazeldene Drive Tenants & Residents Association  
Harrow Dental Centre  
  
Abbey Dental Practice  
B Cohen Dental Practice  
Bridge Dental Practice  
Bright Dental Practice  
DentiCare  
Dr K A Nathan Dental Practice  
Dr Tikam Dental Surgery  
Family Dental Care  
G Bhuva & J Bhuva Dental Practice  
Harrow View Dental Surgery  
Harrow Weald Dental Practice  
M Ali Dental Practice  
N Bahra Dental Practice  
S Aurora Dental Practice  
Village Surgery  
Preston Medical Centre  
Streatfield Surgery  
GP Direct Medical Centre  
Pinn Medical Centre  
Simpson House Medical Centre  
Enderley Road Medical Centre  
Elliot Hall Medical Centre  
Aspri Medical Centre  
Bacon Lane Surgery  
Blackwell House Surgery  
Chandos Surgery  
Charlton Medical Centre  
Civic Medical Centre  
Dr. Eddington & Partners (1)

English Golf Union  
Harrow Heritage Trust  
St Mary's Church  
Harrow High Street Association  
Friends of Bentley Priory National Reserve  
Harrow in Leaf  
Kenton Bridge Medical Centre  
  
Kenton Clinic  
Mollison Way Medical Centre  
Pinner View Medical Centre  
Preston Road Surgery  
Primary Care Medical Centre  
Roxbourne Medical Centre  
Savita Medical Centre (1)  
Savita Medical Centre (2)  
Shaftesbury Medical Centre  
St. Peter's Medical Centre  
Stanmore Medical Centre  
The Circle Practice  
The Elmcroft Surgery  
The Enterprise Practice  
The Harrow Access Unit  
The Medical Centre  
The Northwick Surgery  
The Pinner Road Surgery  
Uxendon Crescent Surgery  
Wasu Medical Centre  
Harrow Public Transport Users Association  
Harrow Weald Common Conservators  
Zain Medical Centre  
Alexandra Avenue Health & Social Care Centre  
Belmont Health Centre  
Brent & Harrow Consultation Centre  
Honeypot Lane Centre  
Kenmore Clinic  
North Harrow Community Centre

The Georgian Group  
Harrow College (Harrow Weald Campus)  
Stanmore Park Children's Centre  
Whitefriars Children's Centre  
Chando's Children's Centre  
Grange Children's Centre  
Kenmore Park Children's Centre  
D Barnett Dental Practice  
Greater London Action on Disability  
Regard  
Age Concern London  
Centre for Accessible Environments  
Royal Institute of British Architects  
Commission for Architecture and the Built Environment  
Harrow Association of Disabled People  
JMU Access Partnerships  
JRF London Office  
United Kingdom Institute for Inclusive Design  
HoDiS  
Litchurch Plaza  
Shopmobility  
Disabled Foundation  
Harrow Crossroads  
Harrow Mencap  
Mind in Harrow  
Community Link Up Inclusion Project  
Royal National Institute for Blind People  
Royal National Institute for the Deaf  
People First  
Disability Awareness in Action  
National Centre for Independent Living  
Headmaster, Harrow School  
Our Lady & St Thomas of Canterbury  
Pinner Hill Golf Club  
Pinner Historical Society  
Northwood & Pinner Chamber of Trade G Lines  
Peterborough and St Margarets High School for Girls

Dr. Gould & Partners  
Dr. Merali & Partners (1)  
Dukes Medical Centre  
Fryent Way Surgery  
Hatch End Medical Centre  
Headstone Lane Medical Centre  
Headstone Road Surgery  
Honeypot Medical Centre  
Stimpsons  
Mr David Cobb  
Pegley D'Arcy Architecture  
John Phillips  
NVSM Ltd  
Roger Hammond  
Preston Bennett Holdings Ltd  
Studio V Architects  
Stephen Wax Associates Ltd  
W J McLeod Architect  
J G Prideaux  
Steene Associates (Architects) Ltd  
Stanmore College  
Racal Acoustics Ltd  
Lloyds TSB  
The White Horse PH  
Curry Popeck Solicitors  
Allan Howard & Co Estate Agent  
Miss K Mehta  
Mrs Dedhar  
Mr Jay Lukha  
Mr Patel  
Mr Lodhi  
Mr James Palmer  
Mr Harshan  
Mr Sam Fongho  
Mr A Ahiya  
Ms Pauline Barr  
Apollonia Restaurant

Pinner West End Lawn Tennis Club  
Pinner Youth & Community Centre  
Brady-Maccabi Youth & Community Centre  
Grant Road Youth & Community Centre  
Henry Jackson Centre  
Lawn Tennis Association  
Irish Traveller Movement in Britain  
Habinteg Housing Association  
Sean Simara  
Mike Root  
Mr Julian Maw  
Harrow Agenda 21 Waste & Recycling Group  
Harrow and Hillingdon Geological Society  
Eileen Kinnear  
A J Ferryman & Associates  
Anthony J Blyth  
ADA Architecture  
C & S Associates  
C H Mckenzie  
PSD Architects  
David R Yeaman & Associates  
Donald Shearer Architects  
D S Worthington  
Eley & Associates  
G E Pottle & Co  
Geoffrey T Dunnell  
Jackson Arch & Surveying  
H Patel  
J Driver Associates  
John Hazell  
James Rush Associates  
Kenneth W Reed & Associates  
Naren Hathi  
Lawrence-Vacher Partnership  
Robin Bretherick Associates  
Patel Architects Ltd  
PCKO Architects

Pinner Local History Society  
Pinner Local History Society  
David Kann Associates  
Aubrey Technical Services  
Mr M Solanki  
Mr A Modhwadia  
Mr S Freeman  
RKA Architecture  
Madhu Chippa Associates  
Mr J Benaim  
Orchard Associates  
KDB Building Designs  
Jeremy Peter Associates  
JC Decaux UK Ltd  
Dennis Granston  
K Handa  
Gillett Macleod Partnership  
D Joyner  
S Mistry  
Saloria Architects  
Simpson McHugh  
Jeffrey Carr  
KDA Designs  
Mr Gow  
Home Plans  
KCP Designs  
John Evans  
Sureplan  
J Loftus  
V Sisodia  
Anthony Byrne Associates  
Top Flight Loft Conversions  
S Vekaria  
A Frame  
David Barnard  
A Laight  
B Dyer

Mr Harsham  
Mr Mark Roche  
Ms Cacey Abaraonye  
Mr R Shah  
Mr Terry Glynn  
Nugents Park Residents Association  
Linda Robinson  
Roxborough Road Residents Association  
Bryan Cozens  
Merryfield Gardens Residents  
John Richards & Co  
Mr Cunliffe  
LRHEquipment Hire  
Mr H Patel  
Le Petit Pain  
Mrs Jacqueline Farmer  
Mr Rashmin Sheth  
R Raichura  
Pharaoh Associates Ltd  
Mr Paul Bawden  
Mr Kumar  
Mr Deva  
Mrs Jill Milbourne  
Mr Yousif  
Ms Michelle Haeems  
Mrs Mandy Hoellersberger  
Mr George Apedakih  
Mr H Khan  
Mr John Fitzpatrick  
Mr and Mrs Siddiqi  
Mr Shah  
Mr Goreeba  
Ms Anna Biszczanik  
Bhojani, Bhojani Properties Ltd  
Mr Damian Buckley  
Mr Asury  
Mrs Trivedi

Pearson Associates  
Pindoria Associates  
Richard Sneesby Architects  
Mr P Varsani  
Satish Vekaria  
S S & Partners  
Survey Design (Harrow) Ltd  
V J McAndrew  
Nafis Architecture  
N M Architects  
Mr Ian Murphy  
Gibbs Gillespie Estate Agent  
Mr AbdulNoor  
Mr B Nieto  
Ms Jean Altman  
Mr Murray  
Mrs Tsang  
Paige & Petrook Estate Agent  
Mr G Trow  
Mr Parekh  
Mrs Walker  
Mr Abood  
Mr Sanders  
Mr Tom Johnstone  
Mr Daniel Petran  
Marchill Management Ltd  
Mr Milan Vithlani  
Miss Wozniak  
Ms Erika Swierczewski  
Mr Anat  
Mr Patel  
Mr T Karuna  
Hair 2 Order  
Mr John Imade  
I Muthucumarasamy Inthusekaran  
Ms Marli Suren  
Mr M Meke

Sheeley & Associates  
Michael Hardman  
Canopy Planning Services  
E Hannigan  
Plans 4 U  
P Wells  
Mr Sood  
Thomas O'Brien  
Wyndham & Clarke  
Bovis Lend Lease  
Fairview New Home Ltd  
Mr Suresh Varsani  
Rouge Property Limited  
Mr S Pervez C/O Mr T Mahmood  
The Castle PH  
Grimsdyke Hotel  
Irene Wears  
V A Furby  
Kingsfield Arms PH  
Mr & Mrs Deller  
Raj Shah  
Stephen Hassler  
Mr Barry  
Richard Maylan  
Mr Bhupat Patel  
Mr Kirit Dholakia  
Mr Samit Vadgama  
Mr Rasite  
Mr Xioutas  
Mr B S Bhasin  
Mr W Ali  
MR Z Patel  
Mrs Shah  
Mr Kishore Tank  
Mr M Khan  
Mr Manesh  
Mrs Vad

Mr Mark Fernandes  
Mr M Selvaratnam  
Miss Da Cruz  
Mr Mohammed Hyder  
Mr P Allam  
Mr Kevin Conlon  
Mr Shah  
Mr Morshed Talukdar  
Ms Orci  
Mr Oliver Reeves  
Mr Michael Moran  
Mr SA Syed  
Mr Argarwal  
Mr R David  
Ms Lorraine Wyatt  
Mr Vishnukumar  
P J Quilter  
Mrs M Moladina  
Mrs Gill  
Mr Pandya  
Lrh Equipment Hire  
MR Bharat Gorasia  
MR Imran Yousof  
Miss Wozniak  
Mr Gunasekera  
Mrs B Murray  
Mr R C Patel  
Mr Bernard Marimo  
Mrs Patel  
CCRE Touchstone Ltd  
Ms Rena Patel  
Mr M Patel  
Mr Amory & Glass  
Mr V Barot  
Mrs Patten  
Ms Samia  
Mr Anil Mavadia

Team 2 Telecommunications Ltd  
Mr Sadiq  
Mr Gilani  
Mr D Burton  
Foxon Property  
Mr Reidman  
Mr Dillon  
Mr E Campbell  
Doctor A Savani  
Doctor Samantha Perera  
Ms Mc Gleen  
Mr Shemsi Maliqi  
Mr Delroy Ettienne  
Mrs Gohil  
Ms Yvonne Afendakis  
Miss M Lean  
Mr Z Hansraj  
Mr Raja  
Ms Grace Ellis  
Doctor Amin  
Mr Noel Sheil  
Mr Shah  
Mr Singh  
Mrs Cirillo  
Mr Gary Marston  
Mrs Lilley  
Mr Michael Foti  
Helen Stokes  
Mrs S Narayan  
Mr Depaie Desai  
Mr D Morgan  
Mrs K V Hirani  
Mr Christopher Dixon  
Mr and Mrs Patel  
Mrs M Patel  
Mr P Mantle  
Mrs D Nagewadia

Ms Patricia Simpson  
Mr Liu  
Mr V Pansuria  
Mr A Patel  
Ms Rena Khan  
Dr A Savani  
Pk Properties Estate Agent  
Mr John Knight  
Miss Patricia Long  
Mr M Mccarrall  
Mr Oliver Abbey  
Mrs Lipton  
Mr Akhtar  
Mr Andrew Lemar  
Zoom the Loom Ltd  
Miss Mepani  
Mr Ali  
Mrs Shah  
Mr G Vitarana  
Mr Ashwan Shah  
Mr Simon Bull  
Ms Hema Ganesh  
Mr S Nathan  
Mrs Senanayake  
Ventra Management Ltd  
Mssr H Carolan  
Vantage Property Services  
Rawlinson Gold Estate Agent  
Mr R Shah  
Mr J Meegama  
Mr C Patel  
Mr N Shah  
Mr Alpesh Patel  
Mrs Deroy  
Mrs H Pereira  
Ms Alison Wood  
David Conway & Co Estate Agent

Mrs Winnie Potter  
Mrs P Naring  
University of Westminster  
Mr Peter Bennet  
Parkfield Estates  
Mr Dipack Patel  
Mr Jaymesh Patel  
Mrs Rabbie  
Mr Ahmed  
Colin Dean Estate Agents  
Mrs Changela  
Citywest Properties Ltd  
In Residence Estates  
Mr K Patel  
Philip Shaw Estate Agent  
Mr A Patel  
Mr Hiren Hirani  
AKA  
Mrs Scantle Bury  
Ms Mitul Shah  
Mr Sideras  
Mr Wright  
Mrs Ahmed  
Mrs Anastasia Marshall  
Mr V Sorocovich  
Dr Vara  
Hinton & Bloxham Estate Agent  
Raka Properties & Lets Ltd  
Mrs Liza  
Mr Prajesh Soneji  
Mr Shah  
Mrs Amanda Fogarty  
The Rollands Phelps  
Cameron & Associates  
PK Properties Estate Agent  
Mrs Ved  
Mrs N Hindocha

Mrs R J Choudhry  
Mr David Michaelson  
Mr Yaqub  
Mr Wolf  
Mr Fabrizio Pisu  
Mrs Ram  
Mrs Patel  
Mr Dattani  
MRs Naring  
Mr R Harrison  
MRs Neetal Khakhria  
Mrs Bhudia  
Mr Hussain  
Mr Vivek Marwaha  
Mr Pedro Vas  
Hanover Shine Estate Agent  
Mrs Hirani  
Mr C Karaiskos  
High Lawns Hostel  
Mr Patel  
Ms Mullins  
Miss Innis Davis,  
Mr Sanjay Patel  
Skippers Fish & Chips  
MPS Architects  
Mr Lavin  
Mr Stephenson Mallon  
Mr Pravin Bhudia  
Mrs Sandra Jenkins  
Mr P Nathan  
Cumberland Hotel  
MR Pulford  
Tisser and Aromatherapist  
Mr R Dutt  
Mr Lanagan  
Mrs Garner  
Ms J Sanagasegaran

Mr Sandu & H Singh  
Mr R Jani  
Mr Dar  
Bathrooms/Kitchens/Conservatories  
Mr Black  
D Shemie  
Mr A Kidwai  
MR Farhan Ebrahimjee  
Camerons Jones  
Mr D Saran  
Mr A Maragh  
Mr M Mockler  
Mr Bellank  
J B Webber Chemist  
Mr B Patel  
Panstar Group Ltd  
Stephen J Woodward Ltd  
Mr Hedvit Anderson  
Mrs Senanayake  
Mr Mitesh Vekaria  
Mr S Sharma  
Mr Jiten Soni  
Doctor A Savani  
Mrs Uzma Awam  
Mrs Nishma Palasuntheram  
Mr Mahmood Sheikh  
Mr Brian Watson  
Mr K Weerasinghe  
Ms Vanisha Patel  
Mr Vyas  
Mr A Clifford  
Mrs Shelagh Kempster  
Blue Ocean Property Consultant  
Mrs Roth  
Mr Kevin Conlon  
Mr Ramchurn  
Mr K Jabbari

Mr Richards  
Mr Jeff Panesar  
Mr M Haq  
Mr Sidhu  
Playfield Management  
SPLA  
Middlesex Properties  
Mr M Fazio  
Quainton Hall School  
Mr Goodman  
Mr A Hanefey  
Mr Kahn  
Mr Jonjan Kamal  
Luigi Hairdresser  
Ms Lindsey Simpson,  
Mr David Benson  
Mr D'Souza  
Mr Arshad Minhas  
Dr P Sadrani  
Mr Eric Lipede  
Mrs McKenzie  
Mr C Mohotti  
Mr Dalius  
Miss M Patel  
Mr K Nava  
Mrs Trivedi  
Mr MH Asaria  
Mr N Johnstone  
Miss F Khan  
Mr A Balasusriya  
Mr John Campbell  
Mr P Lewis  
Miss Shah  
Mrs Regunathan  
Mr Dattani  
Mr Brian Lampard  
Mr Ralph Jean-Jacques

Mr Mohamed Ariff  
Mrs Elliot  
Mr N Radia  
Mrs S Akhtar  
MR Taylor  
Castle Estates  
Mr Sturrock  
Mr Mathew Hutchinson  
Mr Bhupinder Singh  
MRs J Ahilan  
Ms F Bajina  
Anscombe & Ringland Est Agent  
Mr NG Lakhani  
Mr Campbell  
Mrs R Draycott  
Stephen J Woodward Ltd  
Mr G Trow  
Burgoyne Johnston Evans  
Wilson Hawkins & Co  
Mr N Patel  
Mr Antonio Branca  
Mr Brijesh Mistry  
Mr Sanjay Naran  
Mr Mohamed Agwah  
Mr Ramzan Farooqi  
Mr A Jaroudi  
Mrs Jacqueline Pepper  
Mr Patrick Curran  
Mrs Jacqueline Pepper  
Mr Saleem  
Mr William Hunter  
Mrs Q Chow  
Mr Khan  
Mr Dene Burton  
Mr Deva  
Mr B Desai  
Miss J Parker

Mr McCormack  
Mrs Kettles  
Mr Rulamaalam Asokan  
Mr Alexis  
Mr Raymond

Mr Rupesh Valji  
Chase Macmillan Estate Agents  
Mrs O'Sullivan  
Mrs D Ahmed  
Mr Dene Burton

Mr R Carnegie  
Mr James Kearney  
Mr A Ahmed  
Mr G Puvanagopan  
Mr Patrick Curran

## Appendix D – Statement of Representations Procedure

### Statement of Representations Procedure for the: Harrow Community Infrastructure Levy - Draft Charging Schedule (Regulation 16)

Harrow Council has published a Draft Charging Schedule which sets out the Council's proposed charges to be levied on development through a Community Infrastructure Levy. It follows consultation on a preliminary draft charging schedule during August/September 2012 and constitutes the Charging Schedule that the Council intends to submit to the Planning Inspectorate for independent Examination in Public.

**Title of documents:**

Harrow Community Infrastructure Levy - Draft Charging Schedule

**Subject matter:**

The Draft Charging Schedule is the main component of a Community Infrastructure Levy for the Borough and sets out the charges (per sq. m) that will be levied on certain types of development to fund essential infrastructure.

**Area covered:**

Harrow's Community Infrastructure Levy will apply Borough wide.

**Period within which representations must be made:**

Representations can be made over the five week publication period, beginning on **Thursday 15<sup>th</sup> November 2012** and closes at **5pm on Thursday 20<sup>th</sup> December 2012**.

**Availability of Documents:**

The Draft Charging Schedule and relevant evidence can be viewed online at:

- [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf)
- [http://harrow.limehouse.co.uk/portal/planning/harrow\\_community\\_infrastructure\\_levy/draft\\_charging\\_schedule](http://harrow.limehouse.co.uk/portal/planning/harrow_community_infrastructure_levy/draft_charging_schedule)

Hard copies of the Draft Charging Schedule are available at Harrow Civic Centre (duty planner office) and at the Borough's libraries (see overleaf for locations and opening times).

**Making Representations**

Representations may be made in writing:

- by e-mail to: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or
- by letter to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Harrow, HA1 2UJ

Representations may include a request to be heard by the Planning Inspector at the Examination in Public and may include a request to be notified:

- i. that the draft charging schedule has been submitted to the Planning Inspectorate;
- ii. of the publication of the recommendations of the Planning Inspector and the reasons for those recommendations; and
- iii. of the approval of the charging schedule by the Council.

Please note that comments cannot be treated as confidential. They will be made available as public documents.

It is anticipated that the Examination in Public will take place during the Spring 2013.

For any queries please telephone the LDF Team on 020 8736 6082 or e-mail [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

Representations must be received no later than **5pm** on **Thursday 20<sup>th</sup> December 2012**.

<b>Address</b>	<b>Opening Times</b>	<b>Address</b>	<b>Opening Times</b>
<b>Civic Centre Reference Library</b> Station Road, Harrow, HA1 2UU	Mon.- Thurs 9.30 – 8.00 pm Fri 9.30 – 5.30 pm Sat 9.00 – 5.00 pm	<b>Pinner Library</b> Marsh Road, Pinner HA5 5NQ	Mon – 9.00 – 5.30pm Tues, Thur 9.00 – 8.00pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
<b>Gayton Central Lending Library</b> Garden House, 5 St John's Road, Harrow, HA1 2EL	Mon- Thurs 9.30 – 8.00 pm Fri 9.30 – 5.30 pm Sat 9.00 – 5.00 pm	<b>Rayners Lane Library</b> 226 Imperial Drive, Rayners Lane, HA2 7HJ	Mon – 9.00 – 5.30 pm Tues, Thur 9.00 – 8.00pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
<b>Bob Lawrence Library</b> 6-8 North Parade, Mollison Way, Edgware, HA8 5QH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	<b>Roxeth Library</b> Northolt Road, South Harrow, HA2 8EQ	Mon – 9.00 – 5.30 pm Tues, Thur 9.00 – 8.00pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm

<p><b>Hatch End Library</b> Uxbridge Road, Hatch End HA5 4EA</p>	<p>Mon – 9.00 – 5.30 pm Tues, Thur 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm</p>	<p><b>Stanmore Library</b> 8 Stanmore Hill, Stanmore, HA7 3BQ</p>	<p>Mon – 9.00 – 5.30 pm Tues, Thur 9.00 – 8.00pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm</p>
<p><b>Kenton Library</b> Kenton Lane, Kenton, HA3 8UJ</p>	<p>Mon – 9.00 – 5.30 pm Tues, Thur 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm</p>	<p><b>Wealdstone Library</b> The Wealdstone Centre, 38/40 High Street, Wealdstone, HA3 7AE</p>	<p>Mon – 9.00 – 5.30 pm Tues, Thur 9.00 – 8.00pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm</p>
<p><b>North Harrow Library</b> 429-433 Pinner Road, North Harrow, HA1 4NH</p>	<p>Mon – 9.00 – 5.30 pm Tues, Thur 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm</p>		

## Appendix E – Minutes of the West London Alliance Policy Officers Meeting – 17 January 2013

### West London Alliance - Planning Policy Officers

#### Meeting Notes - 17th January 2013 (10am to 12 noon)

*(Venue: Room 4.12, Perceval House, Uxbridge Road, Ealing, W5 2HL)*

#### Present:

Ken Hullock- Brent	Steve Barton- Ealing	Matthew Paterson- Harrow
Rob Krzszowski- LB H&F	Brian Whiteley- Hillingdon	Julia Worboys- Hounslow
Gillian Spry - WLA	Shahnaz Abbasi - WLA	

**Apologies:** Chris Walker, Brent; Nick Lynch, Barnet; Nick Lynch- Barnet

- 1. Welcome and Introductions** – Chris Walker & Ian Nichol not available – Ken Hullock from Brent took the Chair + Gillian Spry represented WLA
- 2. Notes of the meeting of 4th October 2012**
  - Policies Maps – Ealing noted they had obtained advice that Policies Maps are not development plan documents – they are publishing an atlas of proposed changes to their Proposals Map and noted that they need to advertise any designations based on but different to original London Plan designations
  - Harrow plus Hammersmith & Fulham intend producing e-versions only in order to show all the different layers of information – some of which are boroughwide (e.g. critical drainage areas)
- 3. Specialist Services**
  - Harrow – currently have spending review under way and likely to lose specialist biodiversity and landscape staff
  - Ealing & Hounslow – discussing sharing services
  - Ealing – may lose their access officer from May; keen to share use of their energy officer with other boroughs; now using Design for London consultant to give design advice on planning applications (sharing him with Croydon)
  - No other available capacity identified elsewhere – to review at next meeting
- 4. External Review of Government Planning Practice Guidance**
  - Agreed BW to draft WLA officers' response over next two weeks, circulate for comments and respond to DCLG by **15 February 2013**

- Responses to go via e-Mail: [planning.guidance@communities.gsi.gov.uk](mailto:planning.guidance@communities.gsi.gov.uk) or post to :  
Sangeeta Sofat - Review of Planning Practice Guidance,  
Department for Communities and Local Government,  
1/J1 Eland House, Bressenden Place, London SW1E 5DU
- BW noted interest in retaining much of advice available in PPS 5 re historic assets – will circulate draft reply to check if colleagues favour retaining other PPG / PPS contents or associated guidance
- Also need to lobby DCLG to provide future advice on duty to co-operate, etc

## 5. Policy / CIL Updates

### General Issues

- London Plan REMA EiP Inspector's Report should be due for publication shortly
- Noted that 2031 population projections in London Plan now seem likely to be achieved by 2018 – could have implications for boroughs' housing figures
- Probably worth all boroughs checking LDF / Local Plan co-ordination with their housing strategies
- All advised to check if Islington EiP Report out – may have useful content re affordable rented housing
- Ealing now anticipate HS2 will run in tunnel through their borough
- They have discussed their DPDs with PINS – Keith Holland has advised that Sustainability Appraisals are being increasingly challenged by developers and you need to assess the risk of individual objections

### Borough Updates

#### Brent

- Drafting Development Management Policies DPD – to circulate initial draft in Summer with a Wembley AAP
- CIL approved by Inspector – to adopt shortly
- Not formally reviewing Core Strategy against NPPF - Harrow noted they had addressed strategic options in their Core Strategy and would not do that again with subsequent DPDs
- One Neighbourhood Forum set up so far - in Sudbury Town

#### Ealing

- Now reviewing compliance of Core Strategy with NPPF
- Keith Holland at PINS has advised the 2012 Local Plan Regulations did not carry forward the “chain of conformity” requirement for subsequent DPDs following on from a Core Strategy
- It may still be problematic introducing a DPD widely at variance from a Core Strategy but it should now be possible to justify something not directly leading on from it
- Site Allocations / Development Management Policies / plus Policies Map changes to be submitted 11 Feb and aim to adopt all next Summer

- Keen to keep Development Management Policies as short as possible and primarily rely on London Plan policies
- Other work in progress: SPDs on development sites (Arcadia plus Ealing Empire Cinema sites) and on Accessible Ealing; two OAPFs in preparation (Park Royal and Southall); three neighbourhood plans coming forward; Schools DPD due for consultation this Spring
- CIL first round of consultation due in Spring with a second later this Summer - adoption scheduled for early 2014
- With current DCLG funding for Neighbourhood Plans it is now important the these only go forward for Examination once they are considered sound as DCLG funds are now paid only after they are formally found sound by an Inspector

#### **Hammersmith & Fulham**

- Following Development Management Policies EiP, to hold further consultations on hotels policy – Inspector’s Report due soon – adoption scheduled for June together with a SPD
- CIL second consultation due April/May

#### **Harrow**

- Three-day EiP opens 22 Jan for Site Allocations / Development Management Policies / plus an AAP
- CIL submission on hold pending checking of December guidance from DCLG re 25% of CIL going to neighbourhoods with boroughs holding the funds on their behalf – will submit by end-Feb

#### **Hounslow**

- A major management staff review has just finished
- They consulted on a Preferred Options version of their Core Strategy last July but are now thinking of taking this forward as part of a single new Local Plan for the borough, aiming for Submission in Spring, 2014
- Intend producing a “Towards a Local Plan” consultation document this May and a draft plan by the end of the year
- Whether Hounslow can introduce CIL without an adopted Local Plan in place has been an issue – they intend going ahead and relying on having the London Plan as a basis instead

#### **6. Notes of the School Places Planning Workshop on 5th December 2012**

- Minutes of the first meeting will be circulated for information – further meeting being scheduled
- Looking at mainstream and SEN provision

#### **7. Update on Waste DPD**

- Noted primary outcomes from latest Steering Group meeting on 09 January – draft work programme now in place for next stages of project

#### **8. Single Local Plan Documents**

- Julia Warboys noted Hounslow had been considering producing a Local Plan in two parts – bearing in mind the recent examples of doing this first at Hillingdon and now at Croydon, both having been examined during or shortly after introduction of the NPPF

- Their latest advice from PINS had been to avoid trying to do this now the NPPF has been in place for some time - it is preferable to move forward with a single Local Plan

**9. Duty to Co-operate**

- Agreed BW to check at London RTAB on 23 Jan whether this was examined by the Inspector at the London Plan REMA EiP
- Noted the (Regulation 22) requirement to now produce Statements of Compliance with the DtC at Submission
- Woking thought to have a good recent example on their website

**10. Update on the new Governance structure for the Property & Asset Programme**

- Andrew Fano (interim Chief Exec at Barnet) took over the chair of this Programme last October
- The previous delivery board is not continuing – the strategic management board remains in place and individual borough directors will be requested to take responsibility for delivering Programme projects

**11. AOB**

- Ian Nichol has asked for comments on how he should respond to a recent consultation for a London Academic Forum

**Dates for future meetings (all 10am in Perceval House)**

25th April 2013

27th June 2013

12th September 2013

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## Appendix F – Minutes of the Hertfordshire and Buckinghamshire councils

### NOTES OF CROSS BOUNDARY MEETING/DUTY TO COOPERATE MEETING

10am 16 July 2012 at Three Rivers District Council, Rickmansworth, Hertfordshire

Attendees: Claire May Three Rivers District Council  
Brian Whitely London Borough of Hillingdon  
Matthew Paterson London Borough of Harrow  
Marguerite Cahill Dacorum Borough Council  
Catriona Ramsay Watford Borough Council  
Jane Custance Watford Borough Council  
David Waker Chiltern District Council  
Simon Warner Hertsmeire Borough Council  
Manpreet Kanda St Albans City and District Council

#### 3) Brief Update on LDDs and Housing Targets

LDD updates provided on attached matrix.

All districts/boroughs feel that housing targets can be met within district/borough boundaries.

Generally completions have been strong and authorities are able to meet five year supply requirements but there has been some fall off in planning applications/permissions which may make this more difficult in future, and some authorities have seen a reduction in planning permissions resulting in development on site.

#### 4) Cross Boundary Issues

##### Gypsies and Travellers

Updates provided on attached matrix.

##### Neighbourhood Plans

Within Chiltern District Council, Chalfont St Peter have frontrunner funding and are intending to produce a neighbourhood plan which would be adjacent to Three Rivers District. Some other parishes have shown an interest in neighbourhood plans but CDC are encouraging them to get involved in the Delivery DPD.

St Albans have had some interest and are helping groups to decide whether a neighbourhood plan should be prepared. The 'Rural Vision' group will be discussing neighbourhood planning with St Albans parishes.

##### Infrastructure

It was considered that infrastructure is generally well covered in infrastructure delivery plans which are subject to consultation with infrastructure providers and surrounding authorities.

Following on from the Water Cycle Study, there may need to be further work on waste water capacity with Thames Water once there is more certainty about housing figures, particularly looking at Maple Lodge Wastewater Treatment Works and need/capacity for expansion.

#### 5) Strategic Matters

Three Rivers anticipate that the only strategic matter for the District is likely to be secondary education, and there has been extensive cooperation with Hertfordshire County Council on this to date.

London Borough of Hillingdon have some concerns about waste planning and the Duty to Cooperate following the suspension of the examination of the North West London Waste Plan. The West London Waste Plan will first seek an in house legal opinion before talking to Counsel and DCLG about fulfilling the Duty to Cooperate before progressing the Plan.

The West London Alliance have discussed the possibility of meeting with similar bodies outside London to discuss strategic issues. Within Hertfordshire, there is the Herts Planning Group which may be an appropriate forum to take this forward.

Dacorum Borough Council produced a Duty to Cooperate statement for submission alongside their Core Strategy, and Hertsmeire and Watford were asked for similar statements through the examination process to demonstrate how the Duty to Cooperate has been met. LB Harrow have a matrix showing who has been consulted and the level of engagement in the process.

As a result of the Duty to Cooperate, it was felt important that where authorities are consulted on a document, if there were no issues a response should be sent stating this.

#### 6) AOB

The GLA are to commission a new SHLAA which will be more in line with PPS3 guidance.

In response to a query from Watford on HMOs, LB Harrow advised that while there had been a perceived problem with HMOs, research showed that the problem was not as large or as concentrated as expected so they are not taking an Article 4 forward. LB Hillingdon have an Article 4 on HMOs around Brunel and will provide some background information.

West London authorities are considering whether and how to address 'beds in sheds' which has been identified as a problem.

The Chilterns AONB board are looking to review the boundaries of the AONB. There would be consultation with relevant authorities as part of this.

If a Local Nature Partnership is established, there is a duty to cooperate with them.

#### 7) Future Meetings

Yearly, or more often if required.

**LDD Update**

<b>Three Rivers</b>	<p><u>Core Strategy</u> Adopted October 2011.</p> <p><u>Site Allocations document</u> Consultation on 'additional sites' 13/7-24/8. Publication due late 2012.</p> <p><u>Development Management policies document</u> Publication 23/7-3/9. Submission due early 2012.</p> <p><u>CIL</u> Joint viability study being finalised. Further work may be required. Consultation October 2012 and January 2013 with examination September 2013 and adoption December 2013.</p>
<b>St Albans</b>	<p><u>Strategic Local Plan</u> Report to Members September with consultation November.</p> <p><u>Site Allocations/Development Management Policies</u> Joint document to be produced.</p> <p><u>CIL</u> Draft charging schedule consultation planned November.</p>
<b>Dacorum</b>	<p><u>Core Strategy</u> Submitted June 2012, examination expected October 2012.</p> <p><u>Site Allocations document</u> Examination expected April 2013.</p> <p><u>Development Management Policies document</u> Examination expected April 2013.</p>
<b>Watford</b>	<p><u>Core Strategy</u> Awaiting Inspector's report following examination.</p> <p><u>Site Allocations document</u> Consultation later in 2012.</p> <p><u>Development Management Policies document</u> Consultation later in 2012.</p>

	<p><u>CIL</u> Possible consultation later in 2012.</p>
<b>Hertsmere</b>	<p><u>Core Strategy</u> Agreeing modifications with Inspector. Inspector considers East of England Plan housing figures to be out of date so will be proposing an early review of targets based on updated population projections.</p>
<b>LB Harrow</b>	<p><u>Core Strategy</u> Adopted February 2012.</p> <p><u>Site Allocations document</u> Pre-submission consultation starts 23/07.</p> <p><u>Development Management policies document</u> Pre-submission consultation starts 23/07.</p> <p><u>Harrow and Wealdstone Area Action Plan</u> Pre-submission consultation starts 23/07.</p> <p><u>CIL</u> Consultation on draft charging schedule end of July.</p>
<b>LB Hillingdon</b>	<p><u>Core Strategy</u> Examinations took place in March, Inspectors report just received finding strategy sound.</p> <p><u>Local Plan Part Two (Site Allocations, Development Management Policies and Policies Map)</u> First stage of consultation due later in 2012.</p> <p><u>CIL</u> Consultation on first draft charging schedule ended 11 July 2012 and will report to Cabinet on 27 September prior to the next consultation stage in the Autumn.</p>
<b>Chiltern</b>	<p><u>Core Strategy</u> Adopted November 2011.</p> <p><u>Delivery DPD</u> Consultation due October 2012, but may change if joint working with South Bucks.</p>
<b>South Bucks</b>	<p><u>Core Strategy</u> Adopted February 2011.</p> <p><u>Development Management policies document</u></p>

## Appendix G – Individual Comments Received and the Council’s Response to Each

ID	Comments Received	Topic / Change	Council Response																												
1	<p>We have considered the BNP Paribas report and the Council’s subsequent Draft Charging Schedule. We are not qualified to comment on the detailed analyses set out in the former which we therefore take as a given.</p> <p>Since the bulk of the residential development in Harrow for the next 15 years is planned to take place within the Harrow and Wealdstone Intensification Area, we are surprised that the Council did not apparently ask the consultants to provide a suggested CIL for this area. Instead, for the purpose of formulating suggested CIL rates, the table at para 7.4.1 puts the Borough into six divisions – thus:</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Max. CIL indicated by appraisal (£s per sq m)</th> <th>Max. CIL net of Mayoral CIL (£s per sq m)</th> <th>Suggested CIL after buffer (£s per sq m)</th> </tr> </thead> <tbody> <tr> <td>South Harrow</td> <td>£180</td> <td>£145</td> <td>£90</td> </tr> <tr> <td>Harrow Weald &amp; Wealdstone</td> <td>£220</td> <td>£185</td> <td>£110</td> </tr> <tr> <td>Harrow Headstone and Canons Park</td> <td>£260</td> <td>£225</td> <td>£135</td> </tr> <tr> <td>Pinner, Hatch End and North Harrow</td> <td>£280</td> <td>£245</td> <td>£150</td> </tr> <tr> <td>Pinner Green</td> <td>£300</td> <td>£265</td> <td>£160</td> </tr> <tr> <td>Harrow Hill</td> <td>£400</td> <td>£365</td> <td>£220</td> </tr> </tbody> </table> <p>Harrow town centre, Kenton, Queensbury, Rayners Lane, Sudbury and Stanmore do not get a mention. Perhaps they are included in the other categories?</p>	Area	Max. CIL indicated by appraisal (£s per sq m)	Max. CIL net of Mayoral CIL (£s per sq m)	Suggested CIL after buffer (£s per sq m)	South Harrow	£180	£145	£90	Harrow Weald & Wealdstone	£220	£185	£110	Harrow Headstone and Canons Park	£260	£225	£135	Pinner, Hatch End and North Harrow	£280	£245	£150	Pinner Green	£300	£265	£160	Harrow Hill	£400	£365	£220	Clarification	<p>The Council can confirm that all areas of the borough are included under the abbreviated area headings set out in the table reproduced in the representation. The borough was divided up by the consultants, BNP Paribas, based upon residential development viability. As set out in the CIL Guidance (DCLG, Dec 2012, para. 27), the existing administrative or policy boundaries may not always be appropriate in establishing charging zone. The relevant value areas by postcodes applicable to the abbreviated area headings are therefore provided below and shown on the maps at <b>Appendix H</b>.</p> <p>Zone 1: South Harrow: (HA2 8, HA2 9 &amp; HA2 0)</p> <p>Zone 2: Harrow Weald &amp; Wealdstone: Harrow Weald (HA3 6 &amp; HA3 5) Wealdstone and Kenton (HA3 7 &amp; HA3 8)</p> <p>Zone 3: Harrow Headstone and Cannon’s Park: Harrow and Headstone (HA2 6, HA1 1, HA1 3 &amp; HA1 4), Cannon’s Park (HA8 6 &amp; HA8 5) and Queensbury (HA3 9)</p> <p>Zone 4: Pinner, Hatch End and North Harrow: Pinner and Hatch End (HA5 5 &amp; HA5 4) and North Harrow (HA2 7) and Stanmore (HA7 3, HA7 2 &amp; HA7 1)</p> <p>Zone 5: Pinner Green: Pinner Green and Rayners (HA5 2, HA5 1 &amp; HA5 5) and Stanmore (HA7 4 and HA7 3)</p> <p>Zone 6: Harrow on the Hill: (HA1 3)</p> <p><b>No change</b></p>
Area	Max. CIL indicated by appraisal (£s per sq m)	Max. CIL net of Mayoral CIL (£s per sq m)	Suggested CIL after buffer (£s per sq m)																												
South Harrow	£180	£145	£90																												
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Pinner Green	£300	£265	£160																												
Harrow Hill	£400	£365	£220																												
1	<p>Given the varied nature of the Borough and its housing, the above wide differences in possible CIL rate calculations were virtually inevitable. In their findings at paragraph 7.1 of their report the consultants identify two options for the Council:</p> <p><b>‘Firstly, the Council could set a single CIL rate across the</b></p>	Include a differential residential rate to cover development in the higher	<p>In deciding to go with a single rate for residential development, in addition to simplicity, the Council also took into account the amount of development planned for over the plan period within the different value areas and, therein, the portion of development already under construction or with planning permission (i.e. that have s106 agreements and are therefore not subject to a further CIL liability).</p>																												

ID	Comments Received	Topic / Change	Council Response
	<p><b>Borough, having regard to the least viable types of development and least viable locations. This option would suggest the adoption of the ‘lowest common denominator’, with sites that could have provided a greater contribution towards infrastructure requirements not doing so. In other words, the Council could be securing the benefit of simplicity at the expense of potential income foregone that could otherwise have funded infrastructure. Secondly, the Council has the option of setting different rates for different types of development and different areas. The results of our study point firmly towards the second option as our recommended route, particularly for residential development.’</b></p> <p>4. Nonetheless the Council proposes to take the first option and to set a single residential CIL rate of £110 per square metre. They justify this on grounds of keeping CIL simple, stating that:</p> <p><b>‘as many developments planned for in Harrow are of mixed use schemes on sites with existing floorspace, a wide variety of different charges would make CIL calculation and collection increasingly difficult.’</b></p> <p>5. CBHE is not seeking “a wide variety of different charges” here, just one or two variations to the residential CIL rate that properly reflect:</p> <p>a) the more prosperous pockets of the Borough, ie Harrow Hill, Pinner, Hatch End, Harrow Weald and Stanmore</p> <p>and</p> <p>b) the special situation in the Intensification Area.</p>	<p>residential value areas</p>	<p>The purpose of this exercise was to determine whether, in quantity terms, it was justified apply a differential residential rate in different parts of the borough.</p> <p>In the highest value area (Zone 6: Harrow on the Hill), only a modest level of development is planned, and then not on the Hill itself but Sudbury Hill (49 units), for which planning permission has already been granted. The application of a differential higher rate for this area is therefore not warranted.</p> <p>Likewise for Pinner and Hatch End (Zone 5), again only a modest amount of new residential development is planned, 96 units with 78 already with planning permission, including Mill Farm Close (48 units) and land rear of 71 Bridge Street (30 units). Therefore, the application of a differential higher rate for circa 18 units does not seem proportionate.</p> <p>With regard to Zone 5 in Stanmore, this covers mostly the Green Belt area which does include a significant amount of planned new housing (423 units). This includes schemes at Bentley Priory (103 units), RNOH (127 units), and Wood Farm (9 units) as well as Jubilee House (35 units) - all of which already have planning permission. The remaining schemes are the land at Stanmore Station (44 units) and the Amner Lodge site (105 units). Both could afford a higher rate than that proposed, so in theory, the Council could apply a differential rate to Zone 5 development.</p> <p>With regard to Rayners Lane and North Harrow (Zone 4), some 407 additional homes are planned for this area. However, 302 already have planning permission or are nearing completion, including Strongbridge Close (92), Rayners Public House (20), Rayners Lane Estate (163), and St Georges Playing Field (27). The remaining units are to come forward through mixed use redevelopment of the Rayners Lane Offices and other smaller sites including Enterprise House (owned by the Council). Again, in theory these could carry a higher rate but the existing floorspace is already significant, so the net increase may be modest.</p> <p>With regard to the western Zone 4, only 25 units are proposed for Queensbury and 30 units for Belmont. While these could again carry</p>

ID	Comments Received	Topic / Change	Council Response
			<p>a higher rate, for such a low quantum of development over a 15 year period, the application of a differential rate does not seem proportionate.</p> <p>The vast bulk of Harrow's planned housing growth is to take place within the Harrow &amp; Wealdstone Intensification Area (2,778 dwellings). The southern portion of the IA, which includes Harrow town centre and Station Road falls within Zones 3, while the Wealdstone portion of the IA falls within Zone 2. Given the desire in the Harrow &amp; Wealdstone Area Action Plan to see the whole area come forward for comprehensive development, the Council did not consider it appropriate to apply a differential charge within this area and therefore, having regard to the 'lowest common denominator' in this instance, would necessarily apply a Zone 2 rate to the entire IA.</p> <p>Outside of the IA, Edgware (Zone 3) is planned for substantial housing provision, some 1,040 dwellings. The majority of the new residential development will be delivered on two schemes already with planning permission: the Honeypot Lane scheme (795 new homes) and the Edgware Town Football Club (189 new homes). There are a number of smaller sites also under construction, including 415 Burnt Oak Broadway (14 units) and 287-297 Whitchurch Lane (10 units). Only 32 homes remain to be delivered over a 15 year period, and therefore the application of a differential rate does not seem proportionate.</p> <p>Within Zone 1 (South Harrow), this is the lowest value area, which the BNP report recommends could support a CIL of £90 per sq m. 406 new homes are planned in the area, with 277 already with planning permission. 100 of the remaining units are to come forward as part of mixed-use redevelopment of the Northolt Road business use area. The Council has not opted for the 'lowest common denominator' as suggested in the representation, as this would have been the lowest rate. However, the application of a rate slightly higher for this area is not considered, by the Council, to put development within this area at risk given that the existing floorspace is significant.</p> <p>Having regard to the above, it is clear that the majority of the</p>

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1	<p>Harrow is not a homogenous borough and the scope for differential rates (Regulation 13 of the CIL Regulations 2010) is precisely designed to cover this. Any CIL calculation must necessarily take account of mixed use schemes and sites with existing floor space. One more variant in the shape of the CIL rate is not, we think, unduly complex. Nor, once the figure is set, can we imagine how this rate could make for any increasing difficulty in the matter of collection.</p> <p>6. One might conclude that the Council's real concern is that developers may be frightened off by the residential CIL rate adopted. Perhaps it is therefore worth recording here what the BNP Paribas report has to say on this point at para 7.6:</p> <p><b>'For residential schemes, the application of CIL of is unlikely to be an overriding factor in determining whether or not a scheme is viable. When considered in context of total scheme value, CIL will be a modest amount, typically accounting for between 2 and 3.5% of value ..... . Some schemes would be unviable even if a zero CIL were adopted.'</b></p> <p>7. Para 2.6 of the Draft Charging Schedule describes the need for £137m to meet the cost of infrastructure to support new development in the borough and adds that there is a funding gap of £61.2m after traditional funding sources have been tapped. At para 3.2 the document states that at expected levels of development the proposed CIL rates will generate £10m to £15m over the next ten years. Clearly if we are to have the facilities we need, then more funding needs to be found and this is the purpose of CIL.</p>	<p>Include a differential residential rate to cover development in the higher residential value areas</p>	<p>remaining housing to be delivered over the plan period is within the Intensification Area. With only modest levels, dispersed across the rest of the borough, it was not considered appropriate to seek a differential residential rate. The rate of £110 per sq m is therefore considered to strike an appropriate balance between funding infrastructure and development viability, with respect to the geographic spread of the remaining development to be delivered across the entire borough.</p> <p><b>No change</b></p> <p>See comments made above</p> <p><b>No change</b></p>

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	<p>8. We urge the Council to have more faith in what it is trying to achieve in Harrow, particularly in the Intensification Area, and to settle on a much more realistic residential CIL rates.</p>		
2	<p>I write on behalf of our client, the Mayor's Office for Policing and Crime/Metropolitan Police Service (MOPAC/MPS), with regard to the Council's consultation on the Community Infrastructure Levy Draft Charging Schedule. The MOPAC/MPS provide a vital community service to Harrow and it is essential that the required community infrastructure, such as policing, comes forward in line with development in order to maintain safety and security in the Borough.</p> <p>The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a sustainable community, consistent with planning policy at all levels. The current planning policy framework that supports policing can be summarised as follows:</p> <p><i>National Guidance</i></p> <ul style="list-style-type: none"> <li>National Planning Policy Framework (March 2012) – one of the objectives of the NPPF is to deliver the right community facilities to meet local needs (Para 70).</li> </ul> <p><i>London Plan</i></p> <ul style="list-style-type: none"> <li>Policy 3.16 requires development proposals to support the provision of social infrastructure and resist the net loss of social facilities. Policing is included within the definition of social infrastructure</li> <li>Paragraph 3.86 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes</li> <li>Policy 7.13 states that Boroughs should work with stakeholders to ensure London remains resilient to emergency and the subtext states the Metropolitan Police should be consulted as</li> </ul>	Policing as a vital community service	<p>Comments are noted</p> <p><b>No change</b></p>

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	<p>part of major development proposals</p> <ul style="list-style-type: none"> <li>Policy 8.2 requires development proposals to address strategic as well as local priorities in planning obligations. Boroughs should set out a clear framework for negotiations on planning obligations in their LDF to ensure that <i>'it will be a material consideration whether a development makes an appropriate contribution or other provision (or some combination thereof) towards meeting the requirements made necessary by, and relating to, the proposed development'</i>.</li> </ul>		
	<p>In light of the overarching policy basis we wish to make the following comments in relation to the Draft Charging Schedule.</p>		
2	<p><i>Draft Charging Schedule – Rates of CIL</i></p> <p>The MOPAC/MPS support the proposed CIL rates set out in the Charging Schedule, in particular the list of uses that will attract a nil charge. This will enable the MOPAC/MPS to implement their Estate Strategy which seeks to optimise the Estate and ensure that an effective and efficient police service is provided across London.</p>	<p>Draft Regulation 123 List</p>	<p>MOPAC/MPS's support for the proposed CIL schedule and draft 123 list is welcomed and noted</p> <p><b>No change</b></p>
	<p><i>Draft Regulation 123 List</i></p> <p>In addition to the above the MOPAC/MPS support the proposed list of beneficiaries of CIL (Regulation 123) which includes policing facilities and that this includes a contribution towards policing where development would have a material impact upon policing provision in the Borough. This is consistent with the DCLG guidance - Community Infrastructure Levy: An Overview published in May 2011 which states that the levy can <i>'be used to fund a very broad range of facilities such as [inter alia] police stations and other community safety facilities'</i> (Para 12).</p> <p>I trust that this is acceptable and that the forthcoming document will continue to support the MOPAC/MPS in the provision of safe and secure neighbourhoods across Harrow and the rest of London.</p>		
3	<p>We write on behalf of our client, Signature Senior Lifestyle, to object to the Draft Community Infrastructure Levy (CIL) Charging Schedule for the London Borough of Harrow. It is</p>	<p>CIL charge will threaten the viability of care</p>	<p>Care homes are private sector developments and do not constitute "community infrastructure" as the respondent suggests. Unlike other community infrastructure, access is limited by ability to pay, rather</p>

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	<p>considered that the proposed CIL charge will threaten the viability of care home development, which is required to meet an identified need for community infrastructure to meet the needs of the elderly and ageing population within the Borough.</p>	<p>home development</p>	<p>than being based on need for care. Seeking to draw a parallel between private care homes and other community facilities, such as hospitals, is disingenuous.</p> <p>Despite an invitation to respondent to provide the Council with evidence for it to consider in finalising its charging schedule, no evidence has been provided by the respondent to support their assertion that the proposed level of CIL would render care home unviable.</p>
3	<p>For the reasons set out below, it is considered the Draft CIL Charging Schedule for the London Borough of Harrow fails to be adequately supported by appropriate available evidence and that the operation of the proposed charge is not consistent with the evidence on economic viability across the charging authority's area - as required by paragraph 211(2)(b) of the Planning Act 2008 and Regulations 14(1)(b) and 14(3) of the Community Infrastructure Levy Regulations 2010 (as amended).</p> <p>Gerald Eve LLP previously submitted representations to the Preliminary Draft Charging Schedule for LB of Harrow asserting that Class C2 care homes actually constitute a 'community use', and that they are, by their very nature, designed to meet the needs of their occupants 'on-site' with healthcare, activities and amenity space provided for residents, which include those who are frail and mobility-impaired. They do not place any requirements on education, social care, sports and leisure infrastructure. New care homes are required to provide adequate car parking for staff and visitors on-site, whilst the provision of 24 hour care requires workers to work in shifts and to be present on-site the vast majority of the day (with work off-site very limited).</p> <p>Unlike Class C3 sheltered accommodation, where the providing residential occupation is the primary function of the use, the essential characteristic of (Class C2) care homes is 'the provision of care'.</p> <p>In considering the need for elderly care, London Borough of Harrow's Infrastructure Assessment and Delivery Plan identifies that the population of those over 65 in the borough is expected to increase by 7,550 between 2009 and 2026, equating to nearly 17% of Harrow's population (a rise of 3%). The assessment states that within this</p>	<p>Care homes constitute a 'community use'</p>	<p><b>No change</b></p> <p>The Council is familiar with how care homes operate and the requirement for 24 hour care to be provided. However, the Council is also aware that such facilities are operated on a purely commercial basis, with the levels of charges to residents generating a high level of profit for the operator. This is evidenced by the very high land values generated by private care homes.</p> <p><b>No change</b></p>

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3	<p>sector, the greatest increase will be in those aged 80+, up 4,670 since 2009 (equating to 48% growth)</p> <p>Private care homes make a considerable contribution to meeting the needs of the elderly by providing provide healthcare and accommodation for residents under one roof. The vast majority of residents live within 5 minutes drivetime of existing Signature Care Homes prior to moving in and as the ageing population is set to grow substantially, private care homes will become critical to meeting the needs of ageing population within Harrow.</p> <p>It is important to recognise that private Care Homes have been determined at planning appeal (such as the appeal relating to the erection of a 64 bed care home at Plot 6a, Great North Way, York Business Park - ref: APP/C2741/A/11/2167481) to provide significant 'community benefits', just as a not-for-profit care home would provide significant community benefits.</p> <p>However, in its response to consultation on the Preliminary Draft Charging Schedule, LB of Harrow considered that privately built and operated care homes are run on a purely commercial basis with the costs of provision being met by sales /rents /fees charged to occupiers of the development and as such they are considered to fall outside the remit of social infrastructure provision.</p> <p>It is important to emphasise however, that zero-payment at the point of delivery does not characterise community facilities, as not all community infrastructure is free to use. Indeed community facilities such as village halls charge for the use of their space, leisure centres charge for use of their facilities and libraries charge for hiring of CDs and DVDs - and so it cannot be argued that community infrastructure can be accessed by its users free of charge.</p> <p>It is considered therefore that the 'profit motive' of commercial operations is the basis for the Council determining that such activities should be liable to pay CIL and on this basis, it could be assumed that 'not-for-profit' care homes operated by charities or local authorities could be considered to be 'community infrastructure'.</p>	<p>Care homes provide significant 'community benefits'</p>	<p>Whilst care homes might well provide benefits to the Community, they are operated as a commercial activity and they generate high land values in comparison to other types of development.</p> <p>Private care homes cannot be considered as "social infrastructure" in the meaning of the CIL regulations, as access to them is determined by ability to pay, rather than need.</p> <p>Drawing parallels with other forms of infrastructure (leisure centres etc) is specious – the examples given by the respondent all levy modest charges, but they are largely financed by public subsidy. Presumably the respondent does not seek to claim that libraries or leisure centres are fully funded from the charges they levy on entry or for use of DVDs. The key difference between community facilities (such as libraries and leisure centres) and care homes is that care homes make a profit which is distributed to the owner. Consequently, development generates substantial land values based on the prospect of receiving that future profit.</p> <p>Any care homes operated by charitable organisations would not be liable to pay CIL, as they would be eligible for exceptional relief.</p> <p>The development of private care homes does not "reduce pressure on the charities and the public sector to develop community infrastructure" as the public sector does not seek (nor is required) to meet the needs of the entire community. The client group of private care homes is totally different from the client group of a local authority.</p> <p>It is highly unlikely that a CIL charge that will equate to 1% to 2% of development costs will "stifle" the development of care homes. Given the high land values generated by private care homes, the Council does not accept that the viability of development is so marginal that such a small additional cost will render them unviable. In any case, the respondent has not submitted any evidence to substantiate their assertion. If such evidence exists, the Council</p>

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3	<p>As the development of private care homes reduces the pressure on charities and the public sector to develop community infrastructure to meet the needs of the local population, it is considered counter-productive to impose a CIL charge on private care home developments that is likely to reduce or even stifle care home development, as this will place more demands on charities and the public sector to make up the shortfall in provision.</p> <p><b>Viability</b></p> <p>Objection is also raised to the CIL Draft Charging Schedule, as it is considered to fail to be adequately supported by appropriate available evidence and that the operation of the proposed charge is not consistent with the evidence on economic viability across the charging authority's area, as required by paragraph 211(2)(b) of the Planning Act 2008 and Regulations 14(1)(b) and 14(3) of the Community Infrastructure Levy Regulations 2010 (as amended).</p> <p>It setting out the 'evidence of an assessment of development viability', the Preliminary Draft Charging Schedule, states that:</p> <p><b>“Viability demonstrates that residential development can absorb a maximum CIL of £180 (in South Harrow) to £400 per sqm (in Harrow on the Hill); retail development to a maximum of £200 per sqm; and hotel and student accommodation £100 per sq m. <u>All other forms of development are not viable</u>”</b> [Gerald Eve Emphasis]</p> <p>Subsequently, the Draft Charging Schedule states that:</p> <p><b>The findings of the viability study demonstrates that residential development (Use Class C3) can absorb a maximum CIL of £180 (in South Harrow) to £400 per sq m (in Harrow on the Hill); Retail development (Use Class A1 – A5) to a maximum of £200 per sq m; and hotel (Use Class C1), residential institutions (Use Class C2), student accommodation, hostels and HMOs (Sui Generis) £100 per sq m. All other forms of</b></p>	<p>Viability evidence in respect of care home developments</p>	<p>would of course consider it.</p> <p><b>No change</b></p> <p>The Council has not specifically tested a care home as part of its evidence base, as it is not required by the Regulations to test every single sub-set of development types. Residential development in the wider sense (including sheltered housing) has been tested and the Council is satisfied that the proposed rates strike an appropriate balance between viability and maximising funding for infrastructure. The evidence focuses on the types of development that are likely to form the bulk of new development in the Council's Local Plan, to ensure that the proposed rates do not threaten the viability of development, taking the area as a whole.</p> <p>Unlike C3 sheltered housing, C2 care homes are not required by planning policy to make contributions towards affordable housing. This gives them a competitive advantage over most other types of residential development. It is therefore difficult to understand how a very modest CIL rate that equates to less than 2% of development costs would threaten the viability of care homes to any greater degree than other residential development.</p> <p>Despite an invitation to provide the Council with evidence for it to consider in finalising its charging schedule, no evidence has been provided to demonstrate that the proposed CIL would render Care Home development unviable. A CIL rate of £55 per square metre is a very modest proportion of development costs and viability of care homes is unlikely to be so marginal that the CIL will make them unviable.</p> <p><b>No change</b></p>

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3	<p><b>development are not viable.</b></p> <p>The viability of Class C2 developments following the imposition of CIL has however not been tested, despite the Council's Response to Consultation on the Preliminary Draft Charging Schedule stating explicitly that 'the Council will seek confirmation of the range of Class C2 type development viability, and will publish this as an addendum to the viability report' this has not happened. There is therefore no justification that the development of Class C2 Care Homes is viable.</p> <p><b>Recommendation</b></p> <p>It is considered that a viability report should be completed to demonstrate that Class C2 Care Home developments are able to be viable following the imposition of the proposed £55 psqm CIL charge.</p> <p>In the event that a charge is applied to Class C2 uses, given the substantial community benefits of private care homes it is considered that sufficient flexibility be provided so that Class C2 uses which have highly dependent users and offer a substantial level of care and community benefits are not subject to a CIL charge.</p> <p>This is an approach which is being advocated by Surrey Heath Borough Council, to prevent private care home developers from being discouraged from investing in the area and consequently placing additional demands on charities and the public sector to make up the shortfall in the form on additional community infrastructure.</p>	<p>Viability evidence in respect of care home developments</p>	<p>Despite an invitation to respondent to provide the Council with evidence for it to consider in finalising its charging schedule, no evidence has been provided to demonstrate that the proposed CIL would render Care Home development unviable. A CIL rate of £55 per square metre is a very modest proportion of development costs and viability of care homes is unlikely to be so marginal that the CIL will make them unviable.</p> <p>While there is no doubt that private care homes offer benefits to the communities in which they are located, they are commercially-led activities that make a profit. Care homes generate high land values and this is not consistent with the respondent's argument that a marginal increase in costs will render them unviable.</p> <p>With regard to the approach being advocated by Surrey Heath BC, Harrow Council would note that the DCLG Guidance is very clear that CIL cannot be used as a tool to deliver or influence policy as it must be predicated on economic viability.</p>
4	<p>Thank you for consulting English Heritage on the London Borough of Harrow's Community Infrastructure Levy (CIL) Draft Charging Schedule. As the Government's Statutory Advisor on the Historic Environment, English Heritage is pleased to comment on this document.</p> <p>As expressed previously in our letter dated 19th September 2012 English Heritage recognizes the importance of Community Infrastructure Levy as a source of funding to deliver the infrastructure necessary to support the Borough's development. However we raised</p>	<p>Offer discretionary relief from CIL for heritage assets as an exceptional circumstance</p>	<p><b>No change</b></p> <p>As stated in our previous response, the Council is not considering introducing a policy on exceptional circumstances relief based on the following reasons:</p> <ul style="list-style-type: none"> <li>• To keep things as simple as possible to begin with;</li> <li>• The circumstances where they would apply are very limited (e.g. the conversion of a heritage building would not attract a CIL, and the wholesale redevelopment and extension of a heritage building would, in general, be resisted);</li> </ul>

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	<p>concerns regarding the application of a local CIL charge on heritage assets and the need to comply with the charge to justify potentially inappropriate development that may cause harm to the significance heritage assets.</p> <p>In our previous letter we highlighted the CIL Regulations (2010), paragraphs 55 - 58, which provide an opportunity for charging authorities to offer discretionary relief from CIL for a chargeable development in exceptional circumstances. We encouraged you to consider the possibility of highlighting heritage assets as a reason to be considered for exceptional circumstances. We would suggest that this could be effectively used for Heritage Assets at Risk, so making the opportunity for these assts to be brought back into appropriate uses more economically viable.</p>		<ul style="list-style-type: none"> <li>• The majority of schemes, following the adoption of CIL, would be unlikely to require onerous Section 106 agreements, and the fact that such agreements can be appropriately negotiated;</li> <li>• The level of charge has been set at a considerably lower level than the maximum viable level; and</li> <li>• The Regulations allow the Council to prepare and publish such policies at short notice, if experience suggests they are needed.</li> </ul> <p>The Council considers that there is sufficient flexibility to overcome viability concerns such as that highlighted by English Heritage in respect of heritage assets. The Council therefore maintains that exceptional circumstances relief is not warranted but the Council will, once the Harrow CIL is implemented, keep this under review.</p> <p><b>No change</b></p>
4	<p>Overall we would still advise that for the historic environment in particular Borough's should still ensure that the conservation of its heritage assets are taken into account when considering the level of the CIL to be imposed so as to safeguard and encourage appropriate and viable uses of the historic environment. We would therefore ask you to include in the text of the Draft Charging Schedule that the significance and sensitivity of heritage assets and their viability for heritage-led regeneration are actively considered when assessing the application of CIL.</p> <p>In the meantime, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the Draft Charging Schedule as they are often best placed to advise on; local historic environment issues and priorities; sources of data; and, consideration of options relating to the historic environment.</p>	<p>Offer discretionary relief from CIL for heritage assets as an exceptional circumstance</p>	<p>See comments above</p> <p><b>No change</b></p>
5	<p>The Mayor welcomes the extent to which his CIL proposals have been taken into account by the Council in its own proposals. We are satisfied that on the basis of the evidence you have brought forward, both the proposed Mayoral and Borough CILs are within the limits of economic viability.</p>	<p>None</p>	<p>The Council notes the response of the Mayor of London and will continue to liaise with TfL regarding transport infrastructure delivery within the borough. The Council will also notify the Mayor of the submission of the Draft Charging Schedule for examination and welcomes GLA attendance at the EiP with regard to the local and</p>

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	<p>We have reviewed the viability evidence prepared on your behalf by BNP Paribas. The approach taken is one we would recognise, and we would endorse their findings that the combined effects of your borough's CIL proposals and those of the Mayor would not render the schemes they consider unviable. We also concur with their assessment that a charge at this level equates to around 2-3.5 per cent of gross development value.</p> <p>We note that Transport for London is identified as both a funding source and a delivery partner in your CIL Infrastructure Planning and Funding Gap document (August 2012). If you have not already done so, you may find it helpful to liaise with relevant teams at TfL as you take your proposals further.</p> <p>Finally, I would be grateful if you could note our request to be notified of submission of your draft charging schedule for examination, publication of the examiner's recommendation and approval of the charging schedule. We would also request that we be heard at any public examination that is held into your draft schedule in accordance with regulation 21 of the Community Infrastructure Levy Regulations 2012, in particular to address the question of compliance with regulation 14(3).</p>		<p>Mayoral CIL rates and the potential effects of the imposition of CIL on the economic viability of development.</p> <p><b>No change</b></p>
6	<p>The draft schedule appears to demonstrate a careful analysis of issues involved and to make useful proposals; but there may be a public interest in the CIL rates which have been settled or proposed in neighbouring areas.</p> <p>It is just possible that at the margins, CIL's might divert desirable developments from Harrow to other areas or even encourage the import into Harrow of less desirable ones, Therefore, it would perhaps be helpful for rates in nearby areas to be published.</p>	Neighbouring borough CIL rates	<p>Whilst of wider public interest, the CIL rates in neighbouring boroughs are not factor that the Council has taken into account in setting its own rates, which are based on local viability considerations. However, London First does compile and maintain a map of London showing the CIL rates proposed or adopted for each borough. This map was latest updated in January 2013 and can be accessed via the following link: <a href="http://londonfirst.co.uk/wp-content/uploads/2013/01/London-CIL-Charging-Schedules-January.pdf">http://londonfirst.co.uk/wp-content/uploads/2013/01/London-CIL-Charging-Schedules-January.pdf</a></p> <p><b>No change</b></p>
7	<p>Thank you for consulting Hertsmere Borough Council on your Draft Charging Schedule. Hertsmere Borough Council notes the content of the Draft Charging Schedule and I can confirm that we do not have any comments at this stage.</p>	None	<p>Response noted</p> <p><b>No change</b></p>

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	<p>Hertsmere Borough Council is currently working with consultants Lambert Smith Hampton on a Stage 2 Economic Viability Assessment which will feed into our Draft Charging Schedule. Hertsmere will consult Harrow Council on our CIL in early 2013.</p>		
8	<p>Thank you for your email dated 16 November 2012 inviting the Highways Agency (HA) to comment on the <b>Harrow Community Infrastructure Levy (CIL) - Draft Charging Schedule Public Consultation</b>.</p> <p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We have reviewed the consultations and do not have any comment at this time.</p>	None	<p>Response noted</p> <p><b>No change</b></p>
9	<p>Thank you for consulting with the Home Builders Federation (HBF) on the Harrow CIL.</p> <p>We note the proposal to charge £110 per square metre (psm) for residential development. The average house size in England is 100 square metres so this would result in a levy of £11,000 per dwelling.</p> <p>We note that the Mayor's CIL in Harrow is £35 psm. This multiplied by the average house size would result in a total levy of 3,500 per dwelling.</p> <p>The Harrow CIL and Mayor's CIL combined would result in a levy of £14,500 per dwelling.</p> <p>We would draw attention to the evidence base for the Core Strategy examination. The <i>Development Viability Study</i> prepared by GVA for the Council tested the impact that various levels of s106 and CIL payments would have on the viability of different levels of affordable housing under varying scenarios (weak and strong market conditions). The Council has an affordable housing target of 40%. The tables with</p>	<p>A rate of £110 per sq m, plus the Mayor's CIL will render most development in Harrow as unviable.</p>	<p>The vast majority of planned development within the Borough is on previously developed land, so it is not correct to assume this will necessarily result in a £14,500 levy per dwelling, noting also that affordable housing is exempt from CIL. For example, a 20 unit scheme with 40% affordable housing would have a total Borough CIL liability of £8,700 per unit, not £14,500 as suggested in the representation. Furthermore, this takes no account of existing floorspace, which can further reduce the CIL liability.</p> <p>The 40% affordable housing target in the Core Strategy is a borough-wide target from all sources. The adopted policy is that on individual schemes, the Council will seek the maximum reasonable having regard to public subsidy, housing mix, site circumstances and development viability. The Council does not apply the target as a quota and, in many instances lower percentages have been accepted when justified on grounds of financial viability. The Council has taken full account of its approach to affordable housing delivery when setting its CIL rates.</p>

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	<p>the results are on pages 23-28.</p> <p>These results show that at the rate of 40% affordable housing (now policy) the proposed cost of the combined CIL will make development unviable in nearly all instances except under a few scenarios.</p> <p>Schemes 4, 5,7,8,9 and 10 in a strong market, with low benchmark land values, can afford a combined CIL/S106 package of £15,000 per dwelling. Other schemes would be unviable.</p> <p>Only schemes 4,5,7 and 10 in a strong market, assuming medium benchmark land values can afford a combined CIL/S106 package of £15,000 per dwelling. Other schemes would be unviable.</p> <p>All schemes in other scenarios are unviable except in one or two cases.</p>		<p>The Development Viability Study for the Core Strategy was undertaken by GVA in 2009. To avoid any criticism that the methodology/development assumptions set out in that report are now out of date or no longer applicable, the Council commissioned BNP Paribas to undertake a new Viability Study to inform the CIL rates.</p> <p><b>No change</b></p>
9	<p>It should be noted, that the assessment carried out by GVA, considered the impact of a combined CIL and s106 package. The Mayoral and Harrow CIL in many instances now exceeds these modelled totals, so an additional allowance will have to be made for S106. Once S106 costs are added to the cost of the combined CIL then this will erode viability further. Paragraph 22 of the CIL guidance (DCLG, December 2012) advises that charging authorities provide details about the amounts raised in recent years through S106 agreements.</p> <p>The CIL guidance (DCLG, December 2012) on page 8 advises that charging authorities show how the CIL will contribute to the implementation of the Plan.</p> <p>The proposed CIL rate conflicts with the Council's own earlier evidence base that was used by the Council to justify its affordable housing policy of 40%. As the cost of the combined CIL will exceed what the <i>Development Viability Study</i> has shown schemes can afford <u>in the majority of cases</u>, and under most scenarios, the figures allowed for in the proposed CIL, in combination with the Mayor's CIL, will render development unviable in Harrow.</p>	<p>Further evidence base requirements</p>	<p>The introduction of CIL has meant that s106 requirements have been significantly scaled back to essentially address site specific mitigation only, and therein, typically only where policy requirements cannot be met/delivered on-site. Such policy requirements have been assessed as part of the normal development costs, and are therefore not additional costs.</p> <p>A paper on past s106 agreements has been prepared and will be made available as part of the evidence base submission documents.</p> <p>Council's IDP sets out where growth and development is planned for in the borough and describes in detail the infrastructure necessary to support the spatial strategy. In the absence of CIL, essential infrastructure that is required to support growth will not be delivered. Ultimately, this may result in refusals of planning applications as the additional burden upon local services will fail to be mitigated.</p> <p>The proposed CIL rates account for a very small proportion of overall development costs (circa 2%) and other factors (particularly sales values, build costs and affordable housing percentage) will be far more influential in determining viability than the levels of CIL.</p>
10	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved,</p>	<p>The role of CIL in delivering the</p>	<p>Harrow's Local Plan sets out strategic policies for the protection, enhancement and creation of the borough's biodiversity and green</p>

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	<p>enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is not a service provider, nor do we have detailed knowledge of infrastructure requirements of the area concerned. However, we note that the National Planning Policy Framework Para 114 states “Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.” We view CIL as playing an important role in delivering such a strategic approach.</p> <p>As such we advise that the council gives careful consideration to how it intends to meet this aspect of the NPPF, and the role of the CIL in this. In the absence of a CIL approach to enhancing the natural environment, we would be concerned that the only enhancements to the natural environment would be ad hoc, and not deliver a strategic approach, and that as such the local plan may not be consistent with the NPPF.</p>	<p>local plan’s approach to the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p>	<p>infrastructure. Beyond site specific mitigation, that will continue to be captured through s106 agreements, the Plan seeks to establish a network of green corridors; to address areas deficient in access to natural and semi-natural environments; to increase the amount of land designated as SINC &amp; SINC’s in active management; to deliver upon the actions set out in the Harrow BAP; the implementation of an open space strategy; to undertake deculverting and river restoration etc. All such projects are included in the Council’s infrastructure delivery plan and identified for potential CIL funding in the draft Regulation 123 list.</p> <p><b>No change</b></p>
10	<p>Potential infrastructure requirements may include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Access to natural greenspace.</li> <li><input type="checkbox"/> Allotment provision.</li> <li><input type="checkbox"/> Infrastructure identified in the local Rights of Way Improvement Plan.</li> <li><input type="checkbox"/> Infrastructure identified by any Local Nature Partnerships and or BAP projects.</li> <li><input type="checkbox"/> Infrastructure identified by any AONB management plans.</li> <li><input type="checkbox"/> Infrastructure identified by any Green infrastructure strategies.</li> <li><input type="checkbox"/> Other community aspirations or other green infrastructure projects (e.g. street tree planting).</li> <li><input type="checkbox"/> Infrastructure identified to deliver climate change mitigation and adaptation.</li> <li><input type="checkbox"/> Any infrastructure requirements needed to ensure that the Local Plan is Habitats Regulation Assessment compliant</li> </ul> <p>We hope that you find this information useful.</p>	<p>Potential green infrastructure</p>	<p>As stated above, The list of potential infrastructure suggested by Natural England is similar to that already captured in relevant projects included in the Council’s infrastructure delivery plan and identified for potential CIL funding in the draft Regulation 123 list. It should however be noted that CIL is only one form of funding, and other more traditional funding streams, including capital funding, LIP and joint initiatives, such as Drain London Funding, will also be key in delivering upon the Local Plan’s strategic approach.</p> <p><b>No change</b></p>

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11	<p>Thank you for consulting Thames Water Utilities Ltd (Thames Water) regarding the above.</p> <p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough (Veolia provide the water) and are hence a “<b>specific consultation body</b>” in accordance with the Town &amp; Country Planning (Local Development) Regulations 2004 (as amended in May 2008). In our role as a statutory undertaker we provide new water and wastewater infrastructure, which can include new buildings, in order to support growth and deliver environmental improvements.</p> <p>We submitted comments to the earlier draft schedule in September 2012, but it appears that these have not been incorporated and therefore we remake them below:</p> <p><b>Summary</b></p> <p>Thames Water provide essential infrastructure required 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.</p> <p>The comments above are expanded upon below:</p>	<p>Consider that water and wastewater infrastructure buildings should be exempt from paying CIL.</p>	<p>The Council notes that Thames Water is a specific consultation body, and is listed as such in the Council’s SCI and Policy consultation database. We also note its role in providing essential waste water infrastructure in the borough, which is also clearly reflected in Harrow’s IDP.</p> <p>The Council did consider and respond to Thames Water’s previous representation (see the Consultation Statement on the Preliminary Draft Charging Schedule: <a href="http://www.harrow.gov.uk/downloads/file/13468/consultation_responses_to_pdcs_sept_2012">http://www.harrow.gov.uk/downloads/file/13468/consultation_responses_to_pdcs_sept_2012</a> ).</p> <p>In response, the Council clarified that the definition of a building or floorspace applicable to the CIL levy does not include buildings into which people do not normally go or that people only go into intermittently for the purpose of maintaining or inspecting machinery. The Council also considered such buildings to be classified as sui generis and therefore they would fall under the category of ‘all other uses’ under the Harrow draft charging schedule, and attract a ‘nil’ levy.</p> <p>Therefore on both accounts, buildings required for water and wastewater infrastructure would be exempt from Harrow’s CIL Levy.</p> <p>This position has not changed.</p> <p><b>No change</b></p>
11	<p><b>Purpose of the CIL</b></p> <p>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, conversely, such</p>	<p>Purpose of CIL</p>	<p>Noted. See comments above</p> <p><b>No change</b></p>

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	<p>developments can enhance open spaces by improving the environment.</p> <p>The Communities and Local Government document entitled <i>“The Community Infrastructure Levy – An Overview”</i> 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 <i>“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.”</i></p>		
11	<p>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, we 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.</p> <p>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.</p> <p>For the reasons set out above we consider that buildings required for water and wastewater infrastructure provision should be included in the list of developments that are exempt from paying the CIL.</p> <p>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.</p>	<p>Buildings required for water and wastewater infrastructure provision should be exempt from paying CIL.</p>	<p>See comments above regarding the exemption of water and wastewater infrastructure from paying CIL.</p> <p>Thames Water’s comments, regarding the use of CIL to enhance the sewerage network, was responded to by the Council in response to Thames Water’s representation to the Preliminary Draft Charging Schedule, in which the Council clarified that this would be appropriate in respect of flood risk from surface water sewer flooding. The Council also clarified that strategic water and waste water infrastructure was the subject of assessment as part of the Harrow IDP, which details proposed strategic flood mitigation works, which cover flooding from all sources. Such infrastructure requirements were included in the Council’s proposed draft Regulation 123 List, which was published alongside the Draft Charging Schedule.</p> <p><b>No change</b></p>
12	<p>We write on behalf of our client, Sainsbury’s Supermarket Ltd, in response to publication of the Harrow CIL Draft Charging Schedule</p>	<p>Lack of evidence regarding the</p>	<p>Viability of developments is largely driven by rents and investment yields. These factors are reflected in the substantial difference in</p>

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	<p>and would like to take this opportunity to make representations to the consultations.</p> <p>The DCS proposes a flat rate of £100 per sq m for all retail units (A1-A5 uses) within the borough (in addition to the Mayor's adopted CIL rate of £35 per sq m).</p> <p><b>Lack of Evidence</b></p> <p>The Viability Report (prepared by BNP Paribas Real Estate) only refers to one development scenario, being a 30,000 sq ft proposal. (Indeed, this development scenario is used for all commercial uses). Reference is given to both 'retail' and 'retail warehousing/superstore' uses however no further definition is provided within either the Viability Report or DCS. Whilst high street retail units were considered across the borough, with particular reference given to Harrow, Pinner, Wealdstone and Stanmore, the study suggests that it is unlikely CIL could be levied on retail development outside of these areas (see paragraph 6.26). The use of a single development model is an inadequate basis for a differential CIL. Differential CIL should be supported by "fine grained" evidence. The BNP report does not provide adequate evidence of the effect of the proposed rate on the wealth of smaller retail (and other business) development scenarios that would normally come forward.</p>	<p>impact of the levy on smaller retail developments</p>	<p>rents between the Harrow, Pinner, Stanmore, Wealdstone area and the rest of the Borough.</p> <p>The yield adopted for supermarkets of 6.75% is considerably higher than the 4.75% - 5% yield typically achieved. Our appraisals therefore considerably understate the value of supermarkets. A much higher rate could have been set, but the Council has taken a cautious approach.</p> <p><b>No change</b></p>
12	<p><b>Exceptions Policy</b></p> <p>Sainsbury's suggest that the Council adopt a policy which would provide for the Charging Authority to offer discretionary relief from the CIL payments.</p> <p>Sainsbury's considers it essential that the Council retains the opportunity for such an agreement to be reached in particular circumstances and welcomes the drafting of an exceptions policy in preparation for the next round of consultation.</p>	<p>Exceptions policy</p>	<p>As stated in our previous response, the Council is not considering introducing a policy on exceptional circumstances relief based on the following reasons:</p> <ul style="list-style-type: none"> <li>• To keep things as simple as possible to begin with;</li> <li>• The circumstances where they would apply are very limited (e.g. the conversion of a heritage building would not attract a CIL, and the wholesale redevelopment and extension of a heritage building would, in general, be resisted);</li> <li>• The majority of schemes, following the adoption of CIL, would be unlikely to require onerous Section 106 agreements, and the fact that such agreements can be appropriately negotiated;</li> <li>• The level of charge has been set at a considerably lower level</li> </ul>

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12	<p><b>Conclusion</b></p> <p>In short, the London Borough of Harrow has not undertaken a sufficiently evidenced approach to justify the proposed flat rate £100 per sq m charge for all Class A1-A5 retail uses. The supporting viability study only looks at one development scenario for each retail use. At the very least consideration needs to be given to a range of unit sizes and associated land use values.</p> <p>The Council should give serious consideration towards the adoption of an exceptions policy within the Charging Schedule, to offer discretionary relief for certain types of development from the CIL payments.</p> <p>We trust the above points are helpful and look forward to reviewing the DCS when published in due course. Should you have any queries we would be happy to discuss these with you.</p>	<p>Need to have regard to a range of retail unit sizes and to an exceptions policy</p>	<p>than the maximum viable level; and</p> <ul style="list-style-type: none"> <li>The Regulations allow the Council to prepare and publish such policies at short notice, if experience suggests they are needed.</li> </ul> <p>The Council maintains that exceptional circumstances relief is not warranted but the Council will, once the Harrow CIL is implemented, keep this under review.</p> <p><b>No change</b></p> <p>See comments above</p> <p><b>No change</b></p>
13	<p>I refer to your general letter of 15<sup>th</sup> November and, unfortunately, this was not passed to me by my office until last week. My company is not involved to any great degree with new development but nevertheless I wish to make a comment.</p> <p>I presume that the list of charges refers to new build, rather than change of use or conversion. I recognise the fact that infrastructure has to be paid for and maintained and the public has to contribute to these costs but the proposal would seem to be excessive and counter-productive.</p>	<p>Clarification that the charges apply to new build, rather than change of use or conversion.</p>	<p>The Council can confirm that the CIL rate only applies to net new floorspace - so conversions or change of use, where no additional floorspace is added, would not attract CIL. Where new floorspace is added, only the additional floorspace would be CIL liable and only if this exceeds 100 sq m or creates a new residential dwelling.</p> <p>This detail is already set out in the charging schedule's supporting information provided by the Council.</p> <p><b>No change</b></p>

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13	<p>The average size of a new flat would be in the region of 50/70 sq metres with a sale value of between £225,000 and £275,000, depending upon location and amenities. At the proposed rate it would mean that the basic cost will be increased by between £6,600 and £10,000 per unit. At a time when first-time buyers are struggling to get on to the housing ladder these charges would make the properties even more unaffordable. This in turn may mean that developers will avoid building comparatively low cost properties and stick to the medium to high cost market and that, as I mentioned above, seems to be counter-productive. Surely the local authority's aim would be for more affordable housing and this proposal would simply stifle development.</p>	<p>Impact on housing affordability</p>	<p>The level of CIL represents circa 2% of the sales value, which is still in itself not sufficient to pay for the infrastructure required just to support the new development. In the absence of CIL, essential infrastructure that is required to support growth will not be delivered. Ultimately, this may result in refusals of planning applications as the additional burden upon local services will fail to be mitigated. Conversely, should development still take place, the Council would assume that sales values would be affected where it is known that there are not enough school places, health facilities or local amenities to serve the new development. It is therefore very much a balancing act between ensuring development remains viable and deliverable, and ensuring it can still make a contribution towards the provision of essential infrastructure needed to support it.</p> <p>Securing an appropriate level of affordable housing from new development is taken into account in setting the CIL rates. The affordable housing itself is exempt from CIL liability.</p> <p><b>No change</b></p>



# Residential Value Boundary Areas (South)

