

**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

Planning Policy Team  
Fifth Floor  
The Woolwich Centre  
35 Wellington Street  
London SE18 6HQ

Our ref: RBGCILD/PH

Your ref:

Date: 15<sup>th</sup> December 2014

Dear Sir/Madam,

**Planning Act 2008**  
**Royal Borough of Greenwich Community Infrastructure Levy – Proposed Modifications**

I am writing on behalf of the Mayor and Transport for London (TfL) with comments on the proposed modifications to the Royal Borough of Greenwich's Community Infrastructure Levy (CIL) draft charging schedule.

Proposed Modification 5 – The Mayor and TfL wish to **object** to this proposed modification. CIL is calculated on the basis of gross internal area, in line with the RICS code of practice. Depending on the precise nature of the development the car parking may or may not be exempt from CIL liability but it would be incorrect to exempt such floor space from CIL liability as of right. In addition, the Mayor and TfL believe you have misinterpreted the CIL regulations and it would be contrary to them to treat ancillary car parking for retail superstores/supermarkets and retail warehouses in the way you suggest "*ancillary car parking for retail superstores/supermarkets and retail warehouses will not be included in the calculation for floorspace that is CIL liable, as this type of development is not revenue producing in its own right but is necessary to make a large retail scheme viable.*"

Proposed Modification 8 – For the avoidance of doubt, the Mayor and TfL suggest adding the words 'subject to indexation' after '£35 per sq.m.' but before 'for chargeable development'.

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 2010, in particular to address the question of compliance with regulation 14(3).

In respect of the above requests for notification, I would be grateful if you could contact me at the address below, and/or by email to [peter.heath@london.gov.uk](mailto:peter.heath@london.gov.uk).

Yours sincerely

Peter Heath  
Senior Planner - Planning