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Planning. Design. Economics.

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Date 15 December 2014  
Our ref 12613/04/MH/7993326v1  
Your ref

Dear Sir/Madam

### **Greenwich Community Infrastructure Levy – Submission of Draft Charging Schedule for Examination (November 2014)**

On behalf of Cathedral Group, we comment below on the Community Infrastructure Levy (CIL) Submission Draft Charging Schedule (November 2014) which is currently out to consultation until 15 December 2014.

By way of background to the representations, you will know that Cathedral Group is an active development company within South East London, with a range of large-scale projects completed, under development or proposed in the Royal Borough of Greenwich. These include Devonport House, The Movement, the Coronet Cinema, Grove Market, Alcatel-Lucent and Morden Wharf on Greenwich Peninsula.

#### **Instalment Policy and Phasing**

Cathedral Group welcomes the Council's approach to allow payment by instalments and the proposed instalments policy [Submission reference CE13] to be introduced following the adoption of the Charging Schedule.

Paragraph 11.2 of the CIL Supporting Information Document [submission reference CE9] notes that the February 2014 amendments to the CIL Regulations (2010) allows for both detailed and outline permissions to be treated as phased developments for the purpose of the levy. This means that the each phase would be a separate chargeable development and therefore liable for payment in line with any instalment policy.

As such, Cathedral Group welcomes the Council's acceptance that a planning application can be subdivided into 'phases' for the purposes of the levy as this will be crucial for the viability of large-scale, planned development which is essential element of increasing housing supply in line with National Planning Policy Guidance [Paragraph:056 Reference ID: 25-056-20140612]. In this way, CIL payments would be allowed to be divided up in a manner that relates more closely to the intended overall phasing of the development.



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Whilst the Council's intention to treat each phase as a separate chargeable development for the purpose of the levy is recognised, this has not been reflected in the Draft Charging Schedule Submission (Nov 2014). We would therefore ask for a further small amendment to paragraph 2.3 of the Submission Charging Schedule (Nov 2014) document to read:

*"CIL will be calculate as set out in the Community Infrastructure Levy Regulations (2010)(as amended). This means that CIL will be calculated on the total net additional floorspace created (measured as gross internal area) **by the development or a phase of development**". [Suggested additional text in **bold**]*

We trust that the above comments will indeed be taken into account by the Inspector during the examination of the Submission Draft Charging Schedule (November 2014).

Should you wish to discuss any matters further or require any further information please do not hesitate to contact me or my colleague Timea Nacsa.

Yours faithfully

PP.

A handwritten signature in black ink, which appears to be 'Malcolm Hockaday', written over a dark rectangular background.

**Dr Malcolm Hockaday**  
Senior Director

Copy

Gavin Watters

Cathedral Group