

## Consultation on the draft CIL Charging Schedule

### Comments of the Kensington Society

Thank you for meeting the Kensington Society to discuss the Council's draft CIL Charging Schedule. The Society commented on the previous consultation in January 2013 – attached – and remain the same.

We were disappointed that since the charges will only apply to net additional floorspace over 100 sqm and that the charges only cover residential, hotels and student accommodation, the likely contribution to social infrastructure let alone affordable housing will be small and, in some cases, considerably less than currently paid through the S106 schedule. In addition, most of the major schemes, such as Warwick Road sites and Earl's Court, are excluded, and that schemes like the Tesco site might even find it advantageous to resubmit the scheme to avoid paying for social and community facilities but especially the affordable housing.

Our comments are that:

- **the charging zones do not reflect the value contours for new residential development:**

<http://www.c-r-l.com/wp-content/uploads/2013/09/Savill-report-Spotlight-on-Prime-London-Residential-Market.pdf>

This shows that:

- Notting Hill/Holland Park, covering most of northern Zone B, has lower values than
- Kensington, covering much C and E, whilst
- South Kensington, covering Kensington High Street down to Old Brompton Road and east to Queen's Gate being between the two, and
- Chelsea being slightly below Knightsbridge

This seems more in line with a north to south gradient.

- **the charging zones are slavishly based on postcodes which produces some strange boundaries and oddities**

These look like "precision" whereas a more robust approach might be to use the main roads, such as Cromwell Road and Holland Park Avenue might be better, eg Holland Park might be more appropriate in zone C.

There are a number of outliers that make no sense: such as Chesterton House in Zone C when it is more like Zone E in which it is embedded and the Royal Marsden and the South Building of the Brompton Hospital – it is probably in Zone B, although the value may be lower because of the uses?

- **there should be a charge for large out-of-centre retail and office developments**

There should be charges for retail developments over 1,000 sqm, such as Tesco in Warwick Road and Sainsburys at Kensal.

- **there is a need for greater transparency on how the CIL income will be allocated and in the case of neighbourhoods, how the public will be consulted on the allocation of the funds.**

The Society recognises that the amounts of CIL money will not be large, but suggests that areas who have produced or are producing neighbourhood plans should be able to use the funds to help deliver their local strategy. We support the St Helen's Association's proposal for greater clarity and transparency for the process of allocating resources and greater engagement.