



07 October 2014

Chris Banks
Programme Officer
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Dear Mr Banks

Royal Borough of Kensington and Chelsea Draft Community Infrastructure Levy Schedule

I am writing on behalf of London First in response to the main issues and questions raised by the Examiner's assessment on Royal Borough of Kensington and Chelsea (RBKC) Community Infrastructure Levy (CIL) proposals.

We are concerned the CIL rates proposed by RBKC will put at risk the ability for new residential development to be compliant with the Council's affordable housing policy. The Council has acknowledged that Policy CH2 which sets a 50% affordable housing target is not often met and that testing lower levels of Affordable Housing at 20% and 30% levels demonstrates this point. The charging authority has sought to justify its proposed CIL rates by testing lower levels of affordable housing, we believe this approach would not be compliant with the CIL regulations. There is also the broader question of the sampling the Council has chosen to use. We believe is not representative of the types of schemes that come forward in RBKC, particularly in relation to the affordable housing levels tested.

London First has made a number of written and oral representations at London borough CIL examinations since the Mayor of London introduced his own CIL. In our experience, the evidence produced by the charging authorities and the level of testing at the hearings has evolved over the last few years. While we have found it helpful to refer the Examiner to similar issues that were tackled at other CIL examinations it was of limited use and should not be viewed as a precedent in any way.

London First wishes to reserve its right to appear at the hearing scheduled for the 14th October 2014.

Yours sincerely

A handwritten signature in black ink, appearing to read "Faraz Baber". The signature is written in a cursive, flowing style.

Faraz Baber
Executive Director, Policy
London First

For further information contact:

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