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Sent by email to: CIL@camden.gov.uk

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Camden – CIL Charging Schedule Consultation October 2019

Dear Sir / Madam

Thames Water is the statutory water and sewerage undertaker for the London Borough of Camden. As such they are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

Thames Water have the following specific comments on the charging schedule consultation:

Summary

Thames Water provides 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 stations or new water treatment buildings 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 for the following reasons:

- the CIL was not taken into account in the preparation of Thames Water’s latest business plan, and hence, if for any reason, we were required to pay it this would impact on the ability to deliver important water and wastewater infrastructure required to support growth; and
- water and wastewater infrastructure usually has no significant impact on wider infrastructure provision.

The comments above are expanded upon below:

Purpose of the CIL

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 developments can enhance open spaces by improving the environment.

The Communities and Local Government document entitled “The Community Infrastructure Levy – An Overview” 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 “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.”

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, Thames Water do not benefit in the same way as residential or commercial developers through the ability to sell operational sites with planning permission for operational buildings.

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.

Although most water and wastewater infrastructure buildings would fall under the exemptions set out in the Regulations, for clarity and for the reasons set out above it is considered that buildings required for water and wastewater infrastructure provision should be included in a list of developments that are exempt from paying the CIL with the schedule.

We trust the above is satisfactory, but please do not hesitate to contact Thames Water if you have any queries.

Yours sincerely

Thames Water Utilities Ltd