

NOTICE OF MEETING

CABINET MEMBER SIGNING

**Friday, 20th March, 2020, 11.00 am - Railway Fields - Podium North,
River Park House, N22 8HQ**

Members: Councillors Joseph Ejiofor (Chair)

1. FILMING AT MEETINGS

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2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items will be considered under the agenda item where they appear. New items will be dealt with under item 7 below).

4. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

5. DEPUTATIONS / PETITIONS / QUESTIONS

To consider any requests received in accordance with Standing Orders.

6. NEIGHBOURHOOD COMMUNITY INFRASTRUCTURE LEVY (NCIL) - DISTRIBUTION AND ROUND 1 SPEND (PAGES 1 - 60)

7. NEW ITEMS OF URGENT BUSINESS

To consider any items of urgent business as identified at item 3.

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Bernie Ryan
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Wednesday, 18 March 2020

Report for: Leader Decision 20 March 2020

Title: Neighbourhood Community Infrastructure Levy (NCIL) – distribution and Round 1 spend

Report authorised by: Dan Hawthorn, Director of Housing, Regeneration & Planning

Lead Officer: Rob Krzyszowski, Head of Planning Policy, Transport and Infrastructure (x3213)

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Key Decision

1. Describe the issue under consideration

- 1.1 The Community Infrastructure Levy (CIL) is a charge based on the floorspace of new buildings to help fund infrastructure needs arising from new development. Haringey's CIL has been in effect since 2014.
- 1.2 Legislation allows 15% of CIL collected to be spent on infrastructure or 'anything else that is concerned with addressing the demands that development places on an area', and this is called Neighbourhood CIL (NCIL). In places with an adopted Neighbourhood Plan, this increases to 25% of CIL collected in that area.

Changes to the CIL Governance Document to enable fairer allocation of NCIL

- 1.3 As of 31 December 2019 the amount of NCIL collected in Haringey amounted to £2.36 million. The Council's adopted governance arrangements for the spending of NCIL are set out in the Haringey CIL Governance document (November 2017). For the purposes of spending NCIL the Governance document splits the borough up into 9 areas. It sets out that NCIL should be spent on neighbourhood projects within the neighbourhood of contributing development. Due to varying levels of development across the borough and differences in CIL rates between the western, central and eastern charging zones there are large discrepancies between the amount of NCIL available for spend in each of the 9 areas. As CIL rates across the borough are substantially different and because levels of infrastructure need vary across the borough, the allocation of NCIL purely on the basis of where it is received does not support the Council's aims of fairness and equality. In order to allocate NCIL on a fairer basis it will be necessary to update the Council's CIL Governance document to allow this.
- 1.4 From 3 February 2020 to 9 March 2020 the Council held a consultation on changing the CIL Governance document to allow the Council to spend NCIL in a different area to where it was collected and the necessary amendments to the document to give effect to the same. The consultation responses are

considered in section 8 of this report. Having had regard to the responses and the comments of Regulatory Committee in relation to the proposed changes to the CIL Governance document, approval is sought to amend the CIL Governance Document to facilitate a fairer allocation of NCIL.

Allocation of NCIL

- 1.5 This report sets out four options for the allocation of NCIL across Haringey, the advantages and disadvantages of each option and the option that is recommended the Council pursue. The recommended option allocates NCIL on a much fairer basis between areas with a tilt towards redistributing NCIL in favour of areas that experience more development and Tottenham which has greatest investment need.

Round 1 Consultation (2018) spend

- 1.6 The report also sets out a number of NCIL projects within each of the 9 areas which approval is sought to spend NCIL to progress. These projects were identified by the community through a Round 1 Consultation on NCIL spend in late 2018 and have been selected for delivery in accordance with the CIL Regulations 2010 (as amended) (the “Regulations”), the criteria in the Council’s CIL Governance document for prioritising infrastructure projects to be funded by CIL, and the Borough Plan priorities.

Round 2 Consultation (2020)

- 1.7 Lastly, the report sets out, for information, an overview of the Round 2 Consultation on NCIL spending which will take place later in 2020.

2. Cabinet Member Introduction

- 2.1 The CIL is a charge on developers based on the floorspace of new buildings to help fund infrastructure needs arising from new development. Legislation allows 15% to 25% of CIL collected to be spent in Neighbourhoods on infrastructure which addresses the demands that development places on an area. This is called Neighbourhood CIL (NCIL). Over £2 million of NCIL is currently available to spend in the borough.
- 2.2 The Council’s current adopted approach for the spending of NCIL is that it should be spent on neighbourhood projects within the neighbourhood of contributing development. Due to differences in CIL rates across the borough the amount of NCIL collected in each area doesn’t completely reflect the amount of development that has taken place. Further it also doesn’t recognise different levels of infrastructure need across the borough. This administration supports a more equitable spending of NCIL. As a result, this report recommends a change to the adopted approach for spending accrued NCIL and the subsequent redistribution of NCIL across the borough based on a fairer approach.
- 2.3 The report sets out recommendations for the spending of the accrued NCIL funding on a range of neighbourhood projects suggested by the community

through a consultation in 2018. The projects support the priorities in the Borough Plan and will deliver local improvements that help ensure neighbourhoods feel some of the benefits of new development in their area.

- 2.4 These NCIL spend proposals should be seen alongside the Council's other workstream focused on increasing the CIL rates in the east of the borough, for which a consultation took place from December 2019 to February 2020. Seen alongside NCIL, this demonstrates the Council's commitment to maximising contributions from developers and ensuring local communities feel the benefits of new development.

3. Recommendations

- 3.1 That the Leader of the Council:

- 1) Approves the changes to the CIL Governance document set out in Section 8.2 of this report.
- 2) Approves the allocation of all NCIL collected to date across the borough as set out in Option D in Table 4 in section 9 of this report.
- 3) Approves spending NCIL on Round 1 Consultation (2018) projects as set out in Table 5 in section 10 of this report.

4. Reasons for decision

- 4.1 The collection and spending of CIL including NCIL is governed by the Planning Act 2008 and the Regulations. The Government provides further guidance on CIL and NCIL in the form of Planning Practice Guidance (PPG).
- 4.2 Regulation 59F of the Regulations enables the Council to set aside 15% of CIL receipts (25% in areas with an adopted Neighbourhood Plan Neighbourhood Plan) to support the development of the relevant area by funding— (a) the provision, improvement, replacement, operation or maintenance of infrastructure; or (b) anything else that is concerned with addressing the demands that development places on an area. This portion of CIL is known as NCIL.
- 4.3 The total amount of NCIL funding collected amounts to over £2m. None of this has currently been spent. The Council's current adopted approach for the spending of NCIL set out in the existing CIL Governance document is that NCIL should be spent on neighbourhood projects within the neighbourhood of contributing development. If collected monies are allocated to NCIL areas based on where the CIL was collected there will be large discrepancies across neighbourhoods as to the amount available to spend. The amounts vary not just due to differing amounts of development, but also due to differing CIL rates (the residential CIL rate for the Western Charging Zone is over 17 times that of the Eastern Charging Zone per square metre and the residential CIL rate for the Central Charging Zone is 11 times that of the Eastern Charging Zone per square metre). Consequently, the allocation of NCIL purely on the basis of where it is collected does not support the Council's aims of fairness and equality, particularly when considering the results of the Round 1 consultation on spend.

- 4.4 In these circumstances, and having regard to responses collected to a consultation on changing the CIL Governance document to allow the Council the option of allocating NCIL more fairly across the borough and the comments of Regulatory Committee on the same consultation, it is considered reasonable to amend the Council's adopted approach to allow a fairer approach and subsequently to allocate accrued NCIL across the NCIL areas. There are many ways this could be done but the fairest way is considered to be Option D.
- 4.5 The Council undertook a consultation in 2018 to identify the NCIL spending priorities of neighbourhoods in the borough. Consultation feedback and suggested projects have been reviewed and a proposed package of locally supported projects are proposed for delivery, subject to spending approval. These are compatible with the Regulations and the existing CIL Governance document criteria, align with the Borough Plan priorities and have been agreed with relevant service delivery areas within the Council. The Governance process for identifying projects to be delivered in Neighbourhood Forum Areas is slightly different. Projects within the Highgate Neighbourhood Forum Area have been prioritised by the Highgate Neighbourhood Forum in consultation with the Council, having regard to the policies and proposals within the Highgate Neighbourhood Plan and the other considerations listed above.

5. Alternative options considered

5.1 The alternative options considered are:

- Option 1 - The option of not allocating any NCIL income for NCIL projects has been dismissed. The Council's adopted CIL Governance document sets out governance arrangements for the spending of CIL and is clear that the Council will spend NCIL on local projects as is intended within the Regulations.
- Option 2 - The option of allocating NCIL based purely on the areas in which it has been collected has been dismissed. There is no statutory requirement to do so but this approach would be in accordance with the existing adopted CIL Governance document. However, discrepancies in the amount collected in each area reflect differing levels of development, and the differing CIL rates which are charged across the borough because of varying development viability. This would not be an equitable or fair way to allocate NCIL funds and would be contrary to the Borough Plan objectives. A more detailed consideration of Options A to D for allocation are considered later in the report. Option D is recommended as it combines a fair and equitable approach across each area with a focus on ensuring there is proportionally more NCIL in areas with more development and on Tottenham where there is the greatest need for infrastructure.
- Option 3 – The option of not spending NCIL on projects identified through the 2018 consultation. This option has been dismissed. The Council is required to identify NCIL spending priorities in consultation with local communities. The Round 1 Consultation (2018) yielded over 500 responses and provided a range of appropriate project types and specific projects for potential NCIL spend. These provide a sound basis for the spending of NCIL accrued to date.

6. Background information

CIL

- 6.1 The CIL is a charge on developers based on the floorspace of new buildings to help fund infrastructure needs arising from new development. Receipts from CIL differ from other local contributions for development (i.e. Section 106 planning obligations) in that these are not site specific and can be used to support wider community infrastructure needs. The charging authority sets its own levy rates in a Charging Schedule.
- 6.2 Haringey adopted its first CIL Charging Schedule in July 2014. This was implemented in November 2014. In March 2017 the Council consulted on an updated CIL Partial Review Preliminary Draft Charging Schedule focussing on the east of the borough including a proposed CIL rate increase for residential uses in that part of the borough. This was progressed in November 2019 when Cabinet took the decision to consult on the new Draft Charging Schedule. This consultation started on 18 December 2019 and ended on 11 February 2020.
- 6.3 This report does not focus on the emerging increased CIL rates in the new Draft Charging Schedule, nor does it focus on the spending of the remainder of CIL known as Strategic CIL (SCIL) as these are subject to separate decision-making processes. The focus of this report is on allocating and spending NCIL.

NCIL

- 6.4 The Regulations provide that, where a charging authority has no parish council, up to 15% of CIL collected in an area can be spent in the area on infrastructure projects or 'anything else that is concerned with addressing the demands that development places on an area.' This is known as Neighbourhood CIL (NCIL). This increases to 25% where there is an adopted Neighbourhood Plan in place, (currently the borough only has one adopted Neighbourhood Plan in Highgate). In both cases, the Council must consult with the community on how to spend NCIL.
- 6.5 Planning legislation states that the definition of 'infrastructure' includes but is not limited to:
- Roads and transport facilities
 - Flood defences
 - Schools and other educational facilities
 - Medical facilities
 - Sporting and recreational facilities
 - Open spaces
- 6.6 The Government's PPG on NCIL (paragraph 146) states that the charging authority "should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding. Charging authorities should set out clearly and transparently their approach to engaging with neighbourhoods using their regular communication tools e.g.

website, newsletters, etc. The use of neighbourhood funds should therefore match priorities expressed by local communities, including priorities set out formally in Neighbourhood Plans”.

6.7 Paragraph 146 further clarifies that –

“the law does not prescribe a specific process for agreeing how the neighbourhood portion should be spent. Charging authorities should use existing community consultation and engagement processes. This should include working with any designated Neighbourhood Forums preparing Neighbourhood Plans that exist in the area, theme specific neighbourhood groups, local businesses (particularly those working on business led Neighbourhood Plans) and using networks that ward councillors use. Crucially this consultation should be at the neighbourhood level.

Where the charging authority retains the neighbourhood funding, they can use those funds on the wider range of spending that are open to local councils. In deciding what to spend the neighbourhood portion on, the charging authority and communities should consider such issues as the phasing of development, the costs of different projects (for example, a new road, a new school), the prioritisation, delivery and phasing of projects, the amount of the levy that is expected to be retained in this way and the importance of certain projects for delivering development that the area needs. Where a neighbourhood plan has been made, the charging authority and communities should consider how the neighbourhood portion can be used to deliver the infrastructure identified in the neighbourhood plan as required to address the demands of development. They should also have regard to the infrastructure needs of the wider area.

The charging authority and communities may also wish to consider appropriate linkages to the growth plans for the area and how neighbourhood levy spending might support these objectives.”

Haringey CIL Governance

6.8 In 2015/16, the Housing and Regeneration Scrutiny Panel published a Scrutiny Report on NCIL (see background document). The Report contained 13 NCIL governance recommendations all of which were subsequently agreed to be taken forward by Cabinet on 17 May 2016 (see background document).

6.9 Having regard to these recommendations the CIL charging schedule document adopted in July 2014 was updated to include the CIL Governance document which was adopted by the Council in 2017 (see background document) setting out governance arrangements for CIL including the spending of NCIL.

6.10 National CIL guidelines are not specific on what constitutes a neighbourhood area, and hence allow the Council to decide its own definition of NCIL areas. The Haringey CIL Governance document (see background document) divides the borough into 9 areas for NCIL purposes, two of which are Neighbourhood Forum Areas. The delineation of the 9 areas in this manner was based on the recommendation of the NCIL Scrutiny Report. The nine areas are as follows:

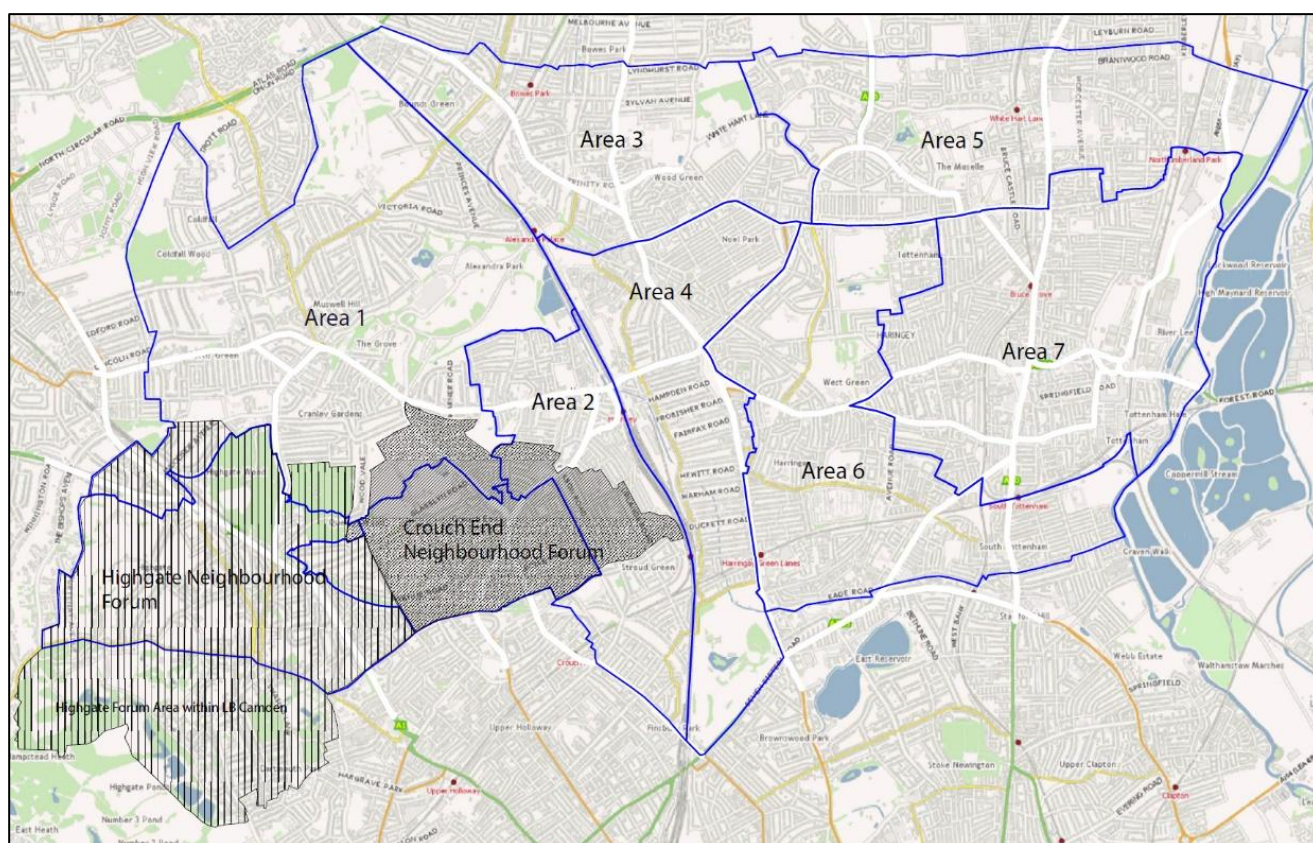
- Area 1- Fortis Green, Muswell Hill and Alexandra

- Area 2- Hornsey and Stroud Green
- Area 3- Bounds Green and Woodside
- Area 4- Noel Park and Harringay
- Area 5- White Hart Lane and Northumberland Park
- Area 6- West Green, St Ann’s and Seven Sisters
- Area 7- Bruce Grove, Tottenham Green and Tottenham Hale
- Highgate Neighbourhood Forum and Plan Area
- Crouch End Neighbourhood Forum Area

6.11 Since the CIL Governance document was adopted in 2017, the Finsbury Park and Stroud Green Neighbourhood Area and Forum has also been established by residents in that area in September 2018.

6.12 The CIL Governance document sets out that NCIL is to be spent on neighbourhood projects within the neighbourhood of contributing development.

Figure 1: Map of 9 Haringey NCIL areas



NCIL collected to previous financial quarter

6.13 The NCIL funds collected to the end of the previous financial quarter (31 December 2019) within each of the nine NCIL areas are set out in Table 1 below. The figures are based upon 15% of relevant CIL receipts in Areas 1 to 7 and the Crouch End Neighbourhood Forum Area, and 25% of relevant receipts in the areas with adopted Neighbourhood Plans (currently only the Highgate Neighbourhood Forum Area).

Table 1: Amount of NCIL collected in each area as at 31 December 2019

NCIL Area	Total NCIL
Area 1- Fortis Green, Muswell Hill and Alexandra	£185,643
Area 2- Hornsey and Stroud Green	£144,790
Area 3- Bounds Green and Woodside	£130,436
Area 4- Noel Park and Harringay	£1,251,384
Area 5- White Hart Lane and Northumberland Park	£32,421
Area 6- West Green, St Ann's and Seven Sisters	£12,288
Area 7- Bruce Grove, Tottenham Green and Tottenham Hale	£238,478
Highgate Neighbourhood Forum and Plan Area	£255,865
Crouch End Neighbourhood Forum Area	£114,997
Total	£2,366,302

6.14 To date no NCIL funds have been spent in Haringey.

7 Justification for considering change to CIL Governance Document

7.1 The key factors that regard has been had to when considering whether to amend the CIL Governance document and the best approach to the allocation of NCIL are set out below:

- Legislation and guidance on NCIL spend;
- The responses received from the 2020 Neighbourhood CIL Redistribution Consultation;
- Borough Plan priorities relating to fairness and equality;
- Equalities legislation;
- The responses to a consultation in 2018 on 'Round 1' NCIL priorities and spend (detailed in section 9);
- Infrastructure needs in each area as set out in the Haringey Infrastructure Delivery Plan (IDP);
- The level of development in each NCIL Area;
- The level of investment need in each NCIL Area.

7.2 The Council's existing adopted approach to NCIL as set out in the Haringey CIL Governance document (see background document) is to spend NCIL in the NCIL area in which it is collected. Under this approach the amount of NCIL available in each NCIL area varies significantly. For example, over £1m is currently available in Area 4 (Noel Park and Harringay wards) and only £12,000 is available in Area 6 (West Green, St Ann's, and Seven Sisters wards). This is partly a function of differing amounts of development across the borough but also it is a function of the fact that CIL charging rates vary substantially across the borough based on the financial viability of development. Current CIL rates for residential development are set out in Table 2.

Table 2: Current CIL charges for residential development (Rates have been indexed for inflation)

Charging Zone	Current CIL rate for residential development (per square metre)

Western Charging Zone	£370.33
Central Charging Zone	£230.59
Eastern Charging Zone	£20.96

- 7.3 The residential CIL rate for the Western Charging Zone is over 17 times that of the Eastern Charging Zone per square metre and the residential CIL rate for the Central Charging Zone is 11 times that of the Eastern Charging Zone per square metre. In these circumstances, the allocation of NCIL purely on the basis of where it is received does not support the Council's aims of fairness and equality. It also does not recognise the effects that development generally in the borough can have on an area even though the development may be coming forward in surrounding areas as designated under the CIL Governance document. If NCIL was only spent within areas based on where the CIL was collected, then there would be large discrepancies across neighbourhoods as to the amount available to spend and the amount to spend would have a weak correlation in relation to the amount of development or infrastructure need across the borough. Instead, the existing adopted NCIL allocation approach is more of a reflection of the financial viability of development and thus the CIL rates set, rather than the amount of development or need.
- 7.4 The Haringey Infrastructure Delivery Plan (IDP) April 2016 (see background document) assesses the infrastructure that is needed to support growth in Haringey over the period of the Council's existing Local Plan (2011-2026). The document does not directly compare the development needs between different areas of the borough, however it identifies area-based deficiencies for a range of infrastructure types together with specific infrastructure interventions needed in the Council's identified growth areas of Tottenham Hale, North Tottenham and Wood Green. On the whole, Tottenham has a much greater investment need that any other area of the borough with funding needed in respect of future health shortfalls, highways schemes, flood and surface water mitigation measures, decentralised energy infrastructure, and costs of £38 million and £57 million estimated for infrastructure to support and regeneration of Tottenham Hale and North Tottenham respectively.
- 7.5 The Regulations and PPG do not prescribe exactly how NCIL should be spent where there is no Parish Council and/or Neighbourhood Plan in place. In areas of the borough where these circumstances apply, there is flexibility for the Council to allocate the NCIL in a different area to where it was collected.
- 7.6 The PPG does envisage spending 25% of NCIL collected in an area with a Neighbourhood Plan in accordance with consultation responses and having regard to the priorities set out in the Neighbourhood Plan. Currently the borough has one adopted Neighbourhood Plan in Highgate. Amongst other things, this sets out proposals to address the demands development places on that area. It is therefore appropriate to ringfence 25% of CIL receipts collected in that area for projects identified in the Neighbourhood Plan for that area and through discussions with the Neighbourhood Forum.

8 Consultation on changes to CIL Governance Document

8.1 From 3 February 2020 to 9 March 2020 the Council consulted on changing the CIL Governance document to allow the Council to spend NCIL in a different area to where it was collected and the necessary amendments to the document to give effect to the same (see background document: NCIL Redistribution consultation document).

8.2 The draft amendments put out to consultation were as follows:

Page 9 (second bullet point)

- 15%, known as the 'Neighbourhood Proportion', is to be spent on neighbourhood projects ~~within the neighbourhood of contributing development~~ (up to a maximum of £100 per existing Council Tax dwelling)...

Page 10 (third paragraph)

- The Council... will pool the neighbourhood proportion of CIL receipts raised ~~from across the borough (except for Neighbourhood Forum areas identified in this document)~~ within the designated neighbourhood area to pay for the items ~~therein~~, investigating other sources of funding (such as grants and match funding) where possible.

Page 11 (first paragraph)

- The Council will then determine how Neighbourhood CIL receipts ~~raised within each CIL Neighbourhood Group are will then be are~~ spent against the list of projects compiled ~~for each area~~ having regard to the consultation responses.

Key

- ~~Strikethrough~~ represents text to be deleted
- Underlined represents text to be added

8.3 During the five-week consultation period, 86 responses were received. 27 responses (31.4%) supported the draft amendments, 50 responses (58.1%) opposed the draft amendments and 9 responses (10.5%) did not indicate a clear for or against position.

- 8.4 The majority of responses opposing the changes (70%) were received from Area 4 which comprises Noel Park and Harringay wards. 29% of responses were received from other areas within the borough or the location was unspecified. One response (1%) was received from outside the borough. Area 4 has collected the greatest amount of NCIL to date and the respondents opposed the changes on the basis that that the area would likely lose some of its current NCIL allocation under any future redistribution scenario. The responses highlighted various infrastructure needs within Area 4 and set out that NCIL collected in the area needed to be retained in the area in order to address these needs. Some responses advised that community support for development would be lost if funds raised from development are spent elsewhere within the borough.
- 8.5 The responses supporting the changes highlighted that the current system of NCIL allocation is unfair and that the proposed changes would facilitate a fairer allocation of NCIL. A common theme within the supportive responses was favour for redistributing NCIL to areas with the greatest infrastructure need, particularly areas 5, 6 and 7 in the east of the borough. A full summary of consultation responses together with the Council's response to them can be found in Appendix A.
- 8.6 On 2 March 2020 Regulatory Committee considered the proposed changes to the CIL Governance document. It recommended the Leader approve the draft changes to the CIL Governance Document having regard to the consultation responses (still ongoing at that time) and the Committee's responses in respect of the consultation. The Committee noted:
- the CIL charging rates are indexed for inflation over time.
 - it had previously recommended an increase in the CIL rates to Cabinet. Cabinet had approved the report to consult on an increase, and this consultation had recently concluded. The results and a recommendation would be submitted to an independent examiner, who would provide a view. Once these steps had completed, a report would be taken at Full Council to implement the increased rates, with implementation likely in 2021. CIL rates must be set based on the financial viability of development.
 - CIL funds had taken some years to build up, CIL was paid upon commencement of a development on site, so there was a time lag between developments being CIL liable and then paying.
 - CIL should be seen in the context of other contributions from developers such as Section 106 (S106) planning obligations and affordable housing
 - that the decision to spend CIL funds would be made taking into consideration where development happened, and the need for development in particular areas.
 - that NCIL boundaries would be reconsidered when the boundary changes had been completed.
- 8.7 The majority of consultation responses opposed the proposed changes to the CIL Governance document. These were mostly received from residents of Harringay and Noel Park wards. Their area would likely see its NCIL allocation reduced under a future NCIL redistribution option. While the majority of respondents therefore oppose the proposed changes, it is considered that retaining the current NCIL arrangement would not be fair. This point was

highlighted by various respondents supporting the proposed changes. Supporters of the proposed changes favoured a revised NCIL allocation which more fairly relates to the amount of development which has taken place in an area and has regard to differences in infrastructure need between areas. Consultation responses identified that the east of the borough has the greatest infrastructure need which is consistent with the Council's IDP (see paragraph 7.4).

- 8.8 Having regard to the key points raised in the consultation responses, and the comments and ultimate resolution of Regulatory Committee, it is recommended that the draft changes proposed to the CIL Governance document set out in paragraph 8.2 above are approved and the CIL Governance document updated to give effect to the changes so that the Council can spend NCIL in a different area to where it was collected. The adoption of a more flexible approach following public consultation which would allow for redistribution of NCIL is consistent with the CIL Regulations and PPG.

9. Allocation of NCIL across the borough

- 9.1 As explained in paragraph 7.5 above, the Regulations and PPG do not prescribe exactly how NCIL should be spent where there is no Parish Council and/or Neighbourhood Plan in place so there is a range of ways that NCIL could be allocated. Four potential options (A to D) for allocating NCIL are set out below. The advantages and disadvantages of the four potential options are set out in Table 3. Option D is the recommended option as it results in a much fairer allocation of NCIL across the borough which neutralises the effects of differential CIL charging rates and has a tilt towards redistributing NCIL in favour of areas that experience more development and Areas 5 and 6 (broadly covering Tottenham) which have been demonstrated through the Council's IDP to have the greatest investment need.
- 9.2 Approval is sought to allocate all NCIL collected to date across the borough as set out in Option D. This method of NCIL allocation would be applied going forward. The NCIL amounts currently available to spend in each area under Option D are set out in the final column of Table 4.
- 9.3 As per paragraph 7.5, all of options ringfence the NCIL within the Highgate Neighbourhood Plan Area. They also ringfence NCIL in the Crouch End Neighbourhood Forum area as this area was identified as separate in the CIL Governance document. As the Crouch End Neighbourhood Forum does not have a Neighbourhood Plan currently the ringfencing is only 15% of NCIL received. The Finsbury Park and Stroud Green Neighbourhood Area and Forum was established in September 2018, after the CIL Governance document was adopted in 2017. As it was not separately identified in the CIL Governance document it is not currently proposed to be ringfenced, but this could be changed in the future should the Forum adopt a Neighbourhood Plan or should the Council review the CIL Governance boundaries.
- **Option A:** Distribute NCIL as per the existing adopted approach based on the percentages set out in the existing Haringey CIL Governance document in the area in which CIL was collected.

- **Option B:** Ringfence the NCIL for the Neighbourhood Forum areas and allocate the remainder of the total NCIL collected equally between Areas 1 to 7.
- **Option C:** Ringfence the NCIL funding for the Neighbourhood Forum areas and allocate the remainder of the total NCIL collected proportionally in Areas 1 to 7 based on the number of wards in an Area.
- **Option D (recommended):** As Option C but with a 'tilt' towards allocating some NCIL collected in favour of areas that experience more development and Tottenham which has greater investment need. The methodology is:
 - The Neighbourhood Forum area amounts remain ringfenced. Of the remaining NCIL available:
 - 15% is allocated to Areas based on the amount of development in an Area^[1].
 - 10% is allocated proportionally to the Tottenham areas (Areas 5 and 7) based on the number of wards in the Areas.
 - 75% is allocated proportionally to Areas 1 to 7 based on the number of wards in each Area (as in Option C).

^[1] The amount of development is based on the NCIL collected as the simplest and most reliable and relevant proxy but adjusted so that the effect of the varying CIL rates across the borough is neutralised to ensure fairness. Each area's percentage share of the overall amount of development is then applied to the topslice amount. This effectively distributes the topslice proportionally based on the amount of development.

Table 3: Advantages and disadvantages of NCIL distribution options

	Advantages	Disadvantages
Option A: Distribute NCIL as per the existing adopted approach based on the percentages set out in the legislation and the area in which CIL was collected.	This is consistent with the Council's adopted approach in the existing CIL Governance document which is that NCIL should be spent in the area in which it was collected.	<p>This option involves large discrepancies between the amount of funding available in each NCIL Area</p> <p>The amount of funding available for each is not completely reflective of the amount of development that has taken place due to differing CIL rates across the borough which are based on development viability. In this sense, it is a less fair approach.</p>
Option B: Ringfence the NCIL for the Neighbourhood Forum areas and allocate the remainder of the total NCIL collected equally between Areas 1 to 7.	This option is the simplest to calculate. It ensures equality between neighbourhood areas but it does not reflect infrastructure needs or demands generated by new development.	<p>An equal distribution of NCIL funding breaks the link between development and infrastructure funding. Areas which have received more development would get the same amount of funding as areas which have received less development. This option would not necessarily reflect infrastructure needs or demands generated by new development.</p> <p>There would be significantly less NCIL available to support projects within Wood Green which is one of the Council's two regeneration priorities (however, strategic infrastructure could be funded through Strategic CIL instead of NCIL).</p>
Option C: Ringfence the NCIL funding for the Neighbourhood Forum areas and allocate the remainder of the total NCIL collected proportionally in Areas 1 to 7 based on the number	The same as option B but reflects the differing sizes of the neighbourhood areas (a rough proxy for their populations).	The same as Option B.

	Advantages	Disadvantages
of wards in an Area.		
Option D (recommended): As Option C but with a 'tilt' towards redistributing some NCIL in favour of areas that experience more development and Tottenham which has greater investment need.	<p>The same as Option C but acknowledging some areas experience more development than others with further emphasis on Tottenham identified as an area in need.</p> <p>The effect of the CIL charging rates being different across the borough is cancelled out by this approach.</p>	<p>Causes differences between amount of funding in each NCIL area but not as extreme as Option A.</p> <p>There would be significantly less NCIL available to support projects within Wood Green which is one of the Council's two regeneration priorities (however, strategic infrastructure could be funded through Strategic CIL instead of NCIL).</p>

9.4 No NCIL funds have been spent to date. The table below shows the amounts available to be spent in each area based on the calculations for each option outlined above. The amounts are as at the end of Q3 2019/20.

Table 4: Amounts currently available if NCIL allocated in accordance with Options A to D above

Area	Option A	Option B	Option C	Option D recommended
Area 1- Fortis Green, Muswell Hill and Alexandra	£185,643	£285,063	£352,136	£271,459
Area 2- Hornsey and Stroud Green	£144,790	£285,063	£234,758	£181,806
Area 3- Bounds Green and Woodside	£130,436	£285,063	£234,758	£184,370
Area 4- Noel Park and Harringay	£1,251,384	£285,063	£234,758	£255,717
Area 5- White Hart Lane and Northumberland Park	£32,421	£285,063	£234,758	£278,585
Area 6- West Green, St Ann's and Seven Sisters	£12,288	£285,063	£352,136	£272,706
Area 7- Bruce Grove, Tottenham Green and Tottenham Hale	£238,478	£285,063	£352,136	£550,796
Highgate Neighbourhood Forum and Plan Area	£255,865	£255,865	£255,865	£255,865
Crouch End Neighbourhood Forum Area	£114,997	£114,997	£114,997	£114,997

Total	£2,366,302	£2,366,302	£2,366,302	£2,366,302
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10. Round 1 Consultation (2018) Spend

10.1 From October to November 2018, the Council undertook an initial consultation in relation to the spend of NCIL receipts ('Round 1'). This consultation covered Areas 1 to 7 (see Figure 1) but excluded the Highgate Neighbourhood Forum Area and the Crouch End Neighbourhood Forum Area.

10.2 A total of 559 community responses were received through the consultation. Responses were submitted from all seven areas within the scope of the consultation, with the highest number of responses relating to Area 1 (Fortis Green, Muswell Hill and Alexandra). Project types which were heavily promoted through the consultation included:

- Library renovations, particularly Muswell Hill Library accessibility improvements (259 responses);
- Tree planting;
- Park and play area improvements;
- Community safety measures, with an emphasis on more CCTV cameras;
- Public realm and cleanliness;
- Youth provision;
- Improved opportunities for walking, cycling, road improvement and traffic management; and
- School building renovations.

10.3 A more detailed summary of the Round 1 Consultation responses is provided as Appendix B.

10.4 The NCIL projects set out in Table 5 below are recommended for spending approval. Further detail on the projects is provided within Appendix C.

Table 5: List of initial NCIL Round 1 Consultation (2018) projects for spending approval, sorted by Area

Area	Project	Ref #	Cost
Area 1 Fortis Green, Muswell Hill and Alexandra	Muswell Hill Library Accessibility Improvements	1	£271,459 contribution (to £357,000 full cost)
	Total for Area		£271,459
Area 2 Hornsey and Stroud Green	Re-deployable cameras x1	2a	£11,000
	On-street waste containment x2	2b	£10,000
	Bike hangars x1	2c	£5,000
	Priory Park Sports and Play Area Enhancements	2d	£100,000
	Stroud Green and Harringay Library Accessibility Improvements	2e	£55,806 contribution (to £180,000 full cost)

Area	Project	Ref #	Cost
	Total for Area		£181,806
Area 3 Bounds Green and Woodside	Re-deployable cameras x2	3a	£22,000
	On-street waste containment x2	3b	£10,000
	Bike hangars x2	3c	£10,000
	Woodside Parks Play Area and landscaping improvements	3d	£46,000
	Chapman's Green New Play Area	3e	£20,000
	Springfield Park enhancements	3f	£10,000
	Wood Green Youth Space Contribution	3g	£50,000
	Total for Area		£168,000
Area 4 Noel Park and Harringay	Re-deployable cameras x2	4a	£22,000
	On-street waste containment x2	4b	£10,000
	Bike Hangars x2	4c	£10,000
	Wood Green Common Playground Update	4d	£50,000
	Wood Green Youth Space Contribution	4e	£150,000
	Total for Area		£242,000
Area 5 White Hart Lane and Northumberland Park	Re-deployable cameras x2	5a	£22,000
	On-street waste containment x2	5b	£10,000
	Bike hangars x2	5c	£10,000
	Bruce Castle Park Landscape Enhancement	5d	£50,000
	Bruce Castle Renovate Multi Use Games Area for various sports	5e	£140,000
	Tower Gardens Landscape Improvements to go pesticide free	5f	£30,000
	LGBT+ Crossing The Roundway and Lordship Lane	5g	£10,000
	Total for Area		£272,000
Area 6 West Green, St Ann's and Seven Sisters	Re-deployable cameras x3	6a	£33,000
	On-street waste containment x3	6b	£15,000
	Bike Hangars x3	6c	£15,000
	Lordship Recreation Ground- Changing Places Accessible Toilet	6d	£65,000
	Downhills Park- Tennis Courts	6e	£100,000
	Wood Green Youth Space Contribution	6f	£50,000
	Total for Area		£278,000
Area 7 Bruce Grove, Tottenham Green and Tottenham Hale	Re-deployable cameras x3	7a	£33,000
	On-street waste containment x3	7b	£15,000
	Bike hangars x3	7c	£15,000
	Hartingdon Park- Landscape Improvements	7d	£30,000
	Tree Planting	7e	£24,000
	Bruce Grove Youth Space Improvement Project	7f	£400,000
	Zebra crossing at Shelbourne	7g	£35,000

Area	Project	Ref #	Cost
	Road		
	Total for Area		£552,000
Highgate Neighbourhood Forum and Plan Area	BMX Track	8a	£170,000
	Parkland Walk Play Area	8b	£90,000
	Tree Planting	8c	£24,000
	Total for Area		£284,000
Total cost	£2,249,265		

- 10.5 The total cost of projects recommended for approval is £2.25m which compares to the £2.36m NCIL available as of 31 December 2019.
- 10.6 The projects listed for Areas 1 to 7 were identified by the community through the Round 1 Consultation in 2018. In some cases, they have arisen as a specific suggestion for example, accessibility improvements at Muswell Hill Library. In other cases, the project has developed and refined internally following a more general suggestion, for example, 'tree planting in Area 7.'
- 10.7 All of the projects identified within Table 5 meet the NCIL legislative requirements which state that NCIL funds must be spent on infrastructure or 'anything else that is concerned with addressing the demands that development places on an area.'
- 10.8 All of the suggested projects have been assessed against the Borough Plan 2019-2023 priorities to ensure they support the Council's ambitions for the borough. They have also been assessed against the criteria in the Council's CIL Governance document for prioritising infrastructure projects to be funded by CIL. Appendix D sets out the performance of each project against the criteria. Each project recommended for NCIL spend scores well against the criteria and is therefore a high priority for receiving NCIL funding.
- 10.9 The different service delivery areas within the Council have been engaged to ensure that the projects are feasible and deliverable. An indicative or baseline cost has been assigned to each project and a delivery process and timescale for delivery has been agreed. A small number of project ideas suggested during the consultation have been excluded from the table as the Council cannot ensure their deliverability e.g. due to feasibility, capacity or funding reasons.
- 10.10 The Governance process for identifying projects to be delivered in Neighbourhood Forum Areas is different to that for projects in Areas 1 to 7. In accordance with recommendation 10 of the Housing and Regeneration Scrutiny Panel's report on the spending of the neighbourhood proportion of CIL (see background document), the processes for determining and prioritising how NCIL is spent should be devolved to Neighbourhood Forums, in consultation with the Council so that it can be ensured the overall process is satisfactory.
- 10.11 The Round 1 Consultation did not cover the Neighbourhood Forum Areas identified in the existing CIL Governance document. Officers have therefore met with the Forums to discuss their priorities and receive their specific project

nominations based on their adopted or emerging Neighbourhood Plan work and the engagement they have already undertaken directly with residents.

- 10.12 Projects identified within the Highgate Neighbourhood Forum Area have been prioritised by the Highgate Neighbourhood Forum in consultation with the Council. These projects have been selected having regard to the policies and proposals within the Highgate Neighbourhood Plan and the other considerations listed in paragraphs 10.7 to 10.9 above. The Highgate Neighbourhood Forum has opted to defer the delivery of accessibility improvements to Highgate Library to a future NCIL spending round. This is on the basis that the funding currently available in the area is not great enough to fund all of the nominated projects and they have assigned the listed projects a higher priority for Round 1 delivery.
- 10.13 The Crouch End Neighbourhood Forum was not included in the Round 1 Consultation in 2018. It has expressed a preference to formulate its own procedure to come up with future NCIL spend projects and consequently there is no proposed project spend in the Crouch End area at this time. The Council will consider future spend in Crouch End following further consultation.
- 10.14 All of the projects listed in Table 5 are recommended for spending approval. This is on the basis they have been identified by the community through the Round 1 Consultation in 2018 (or chosen by the Highgate Neighbourhood Forum Area as set out in paragraph 10.12), meet the NCIL legislative requirements, support the Council's ambitions for the borough as set out in the Borough Plan, and have been demonstrated to be feasible and deliverable.
- 10.15 The Turnpike Lane Improvement Project submitted through the consultation by the Turnpike Lane Joint Strategy Working Group is not proposed to be funded through NCIL but wider Wood Green Regeneration projects were approved by Cabinet on 11 February 2020 and by Council on 24 February 2020 as part of the budget / Capital Programme scheme reference #480 within which the Turnpike Lane project is included. A separate decision will be taken to confirm the source of funding for this approved project, of which Strategic CIL will be considered. Re-deployable cameras put forward through the consultation by the Turnpike Lane Joint Strategy Group are still proposed to be funded by NCIL.
- 10.16 Table 6 sets out the value of projects in each Neighbourhood Area proposed for spending approval versus the NCIL that is available within the respective areas under the recommended allocation option D. While the Round 1 consultation has been very valuable in informing the spend within Areas 1 to 7, it has not directed the spend precisely. The first point to note is that the value of individual projects suggested through the Round 1 Consultation varied considerably. The second point to note is that as response rates varied significantly across the borough some areas nominated many more projects than others. This contributed to differences in the total value of projects nominated in individual areas. Thirdly, the total value of projects has also been impacted by the exclusion of a small number of suggested projects which do not meet the legal requirements for NCIL spending or which Council service departments did not consider to be feasible or deliverable. Not all project ideas or suggestions can be funded through Round 1, but there are opportunities in future Rounds for projects to be put forward.

Table 6: Value of recommended projects in each Neighbourhood Area versus the NCIL that is available under the recommended allocation option D

Area	Funding available under recommended Option D as at 31 December 2019	Value of recommended projects
Area 1- Fortis Green, Muswell Hill and Alexandra	£271,459	£271,459
Area 2- Hornsey and Stroud Green	£181,806	£181,806
Area 3- Bounds Green and Woodside	£184,370	£168,000
Area 4- Noel Park and Harringay	£255,717	£242,000
Area 5- White Hart Lane and Northumberland Park	£278,585	£272,000
Area 6- West Green, St Ann's and Seven Sisters	£272,706	£278,000
Area 7- Bruce Grove, Tottenham Green and Tottenham Hale	£550,796	£552,000
Highgate Neighbourhood Forum and Plan Area	£255,865	£284,000
Crouch End Neighbourhood Forum Area	£114,997	£0
Total	£2,366,302	£2,249,265

11. Round 2 Consultation (2020)

11.1 While the list of initial NCIL Round 1 Consultation (2018) projects for spending approval (set out in Table 5) requires the use of most accrued NCIL in each area, there is expected to be a reliable source of new NCIL over coming years as development which has been granted planning permission comes forward. It is important that the Council builds up a portfolio of possible projects for each neighbourhood so that there aren't considerable delays between NCIL becoming available and NCIL projects being identified and delivered. This is consistent with Recommendation 9 of the Housing and Regeneration Scrutiny Panel's Scrutiny Project on Governance arrangements for spending the neighbourhood proportion of the Community Infrastructure Levy which was as follows: "In anticipation of continuing and accruing income to the neighbourhood CIL, it is recommended that the authorisation process ensures that there is a 'pipeline' of approved community infrastructure projects so that there is continuity in the use of funds (e.g. in case of project delay/failure)." This recommendation was agreed by Cabinet (May 2016) with the response provided that "The Council should aim to over-programme spend to provide for slippage and delay in project delivery. Support may also be required around project delivery – against which the planning service will need to engage further resources (The LPA will seek to ensure that this (sic) additional costs falls within the provisions allowed for in the CIL regulations)."

11.2 The Council's CIL Governance document commits the Council to rerun consultation on NCIL every two to three years to ensure the projects and priorities are still the most relevant to the local community. The Round 1 consultation was held in Autumn 2018 and so the Council will hold a Round 2 consultation on future spending of NCIL later in 2020. This will help inform future NCIL spend in coming years as more NCIL money is collected.

12. Contribution to strategic outcomes

12.1 Priority 2 (People) 'To narrow the gap in outcomes': Allocating NCIL in a different area to where it was collected will enable the Council to increase spend on projects in the areas of the borough which have the greatest level of infrastructure need.

12.2 Priority 3 (Place): NCIL helps fund local infrastructure projects which are necessary to ensure that the growth in the borough is something that everyone can benefit from and produces sustainable, safe, attractive and accessible places. The NCIL consultation process also offers communities the opportunity to shape Place.

12.3 Priority 4 (Economy): CIL receipts are a key source of funding to support the delivery of local physical and social infrastructure. One of the objectives is to "Take account of how people feel about the way their local areas are changing" with an action to "Seek to bring in external funding and use Section 106 and Community Infrastructure Levy budgets to achieve maximum impact".

12.4 Priority 5 (Your Council): The allocation of NCIL in a different area to where it was collected will allow the Council to use its resources in such a way that prioritises the residents and areas which have the greatest level of infrastructure need.

13. Statutory Officers comments

Finance

13.1 The recommendations in this report are that the Leader of the Council:

- 1) Approves the changes to the CIL Governance document set out in Section 8.2 of this report.
- 2) Approves the allocation of all NCIL collected to date across the borough as set out in Option D in Table 4 in section 9 of this report.
- 3) Approves spending NCIL on Round 1 Consultation (2018) projects as set out in Table 5 in section 10 of this report.

13.2 The total cost of projects recommended for approval for Round 1 (see Table 5) is £2.25m which compares to the £2.36m NCIL available as of 31 December 2019.

Procurement

13.3 There are no procurement implications for this report.

Legal

13.4 The Assistant Director of Corporate Governance has viewed and noted this report. The NCIL is to be applied in accordance with the Planning Act 2008 and the CIL Regulations 2010 (as amended). The applicable legal tests and Government Guidance to be followed by the Council when applying NCIL is in sections 4 and 6 of this report

13.5 The Leader is authorised under Article 7.03 of the Council's Constitution to carry out the Council's executive functions. The law does not specify that the approval of NCIL spend is a function that cannot be the responsibility of an authority's executive and so the Leader can authorise the recommendations in section 3 of this report.

Equality

13.6 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

13.7 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

13.8 The report presents various options to the Leader for the allocation of NCIL on a geographic basis in the Borough and various projects that NCIL may be spent on. The options presented may result in different outcomes in terms of equality and equity. These are noted at paragraph 8.7 and it is for the Leader to consider which option may best enable the achievement of Borough Plan outcomes while having due regard for the three aims of the Public Sector Equality Duty noted above.

13.9 Projects that the NCIL may be spent on are identified in Table 5. It is notable that each of these projects may represent a measure to reduce inequalities in Haringey, as follows:

- Accessibility improvements at libraries represent measures to meet the needs of residents with disabilities and older people and may result in improved outcomes for these groups through provision of library services
- CCTV cameras may help to reduce fear of crime and overall levels of criminal activity. It is notable that fear of crime is higher than average among women, BAME communities, Jewish and Muslim residents, those with

disabilities, and LGBT+ residents. BAME communities and younger people are also more likely than average to be victims of crime

- On-street waste containment may help to reduce littering and correspondingly benefit groups who live in areas that are disproportionately impacted by littering
- Improvement and upgrade measures in parks are likely to lead to improved health outcomes for children and young people as well as residents of the areas local to those parks
- Measures to increase tree planting may result in improvements to air quality, which is known to disproportionately harm children, older people, those with disabilities, and BAME communities
- Bruce Grove and Wood Green youth space improvements will help to support young people who may be disadvantaged and have other protected characteristics
- Pedestrian crossing creates an inclusive and safer environment, particularly those with accessibility requirements, and LGBT+ crossings represent the valuing of diversity and support visibility of the LGBT+ community in the borough, which is a protected characteristic

13.10 As noted in the report, the projects outlined here link to outcomes of the Haringey Borough Plan 2019-23. The Borough Plan equalities impact assessment is available to view here:

http://www.minutes.haringey.gov.uk/documents/s107023/ Borough%20Plan%20EQIA_FINAL.pdf

14. Use of Appendices

Appendix A Summary of NCIL Redistribution Consultation responses

Appendix B: Summary of Round 1 Consultation Responses

Appendix C: Round 1 Consultation Spend

Appendix D: Assessment of Round 1 Spend Projects against key criteria

15. Local Government (Access to Information) Act 1985

Background documents:

Adopted Haringey CIL Governance document (November 2017)

https://www.haringey.gov.uk/sites/haringeygovuk/files/cil_charging_schedule_updated_governance_revised_reg_123_004_003.pdf

NCIL Redistribution consultation document

https://www.haringey.gov.uk/sites/haringeygovuk/files/ncil_redistribution_consultation_document.pdf

Haringey Infrastructure Delivery Plan Update April 2016

https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_idp_update_april_2016.pdf

Housing and Regeneration Scrutiny Panel (3 March 2016): Community Infrastructure Levy Governance Arrangements

<http://minutes.harinet.haringey.gov.uk/ieListDocuments.aspx?CId=754&MId=7423&Ver=4>

Cabinet (17 May 2016): Scrutiny Review of Community Infrastructure Levy Governance Arrangements:

<http://minutes.harinet.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=7842&Ver=4>

Cabinet (17 October 2017): Community Infrastructure Levy Governance / Planning Obligations SPD

<http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=8290&Ver=4>

Appendix A - Summary of NCIL Redistribution Consultation Responses

Responses supporting changes	27
Responses opposing changes	50
Responses – neutral/no comment/not applicable	9
Total responses	86

Key points in support of changes to CIL Governance document	Council response
The Council should have greater flexibility in how NCIL funding is distributed.	Support noted
The amount of CIL collected in the east of the borough per square metre is significantly less than the central or the western zones. Current policy leads to a large discrepancy between neighbourhoods which is fundamentally unfair.	Agree that the substantial differences in CIL rates create an unfair allocation of NCIL under the existing Governance arrangements.
The changes will enable a fairer system that allows NCIL to be spent where it is most needed. Differences in CIL rates mean that some of the areas in greatest need of extra spending receive the least NCIL.	Agree that the existing Governance arrangements do not produce an NCIL allocation that reflects different levels of infrastructure need across the borough.
The Council has the best understanding of local needs. This is better than funding being determined by an arbitrary mechanism.	Support noted
Redistribution is needed to reflect the greater investment needs in Tottenham/the east of the borough.	The Haringey Infrastructure Delivery Plan (IDP) April 2016, which assesses the infrastructure that is needed to support growth in Haringey over the period of the Council's existing Local Plan (2011-2026), indicates that Tottenham has greater investment needs than any other area of the borough.
The current arrangement does not recognise the effects that development in one NCIL area can have on other NCIL areas. Proposed changes would help overcome anomalies relating to the arbitrary boundaries of the NCIL areas.	Agree. The current governance arrangements do not recognise the effects that development generally in the borough can have on an area even though the development may be coming forward in surrounding areas as designated under the CIL Governance document.
The proposed changes are consistent with the Council's objective of achieving fairness in all aspects of its service delivery.	Agree. The Council's Borough Plan 2019-2023 seeks to reduce inequality and make Haringey a fairer place.
Key points in opposition of changes to CIL Governance document	Council response
NCIL raised in an area should be spent in that area in line with the CIL requirements.	The CIL Regulations 2010 (as amended) and Planning Practice Guidance do not prescribe exactly how NCIL should be spent where there is no Parish Council and/or Neighbourhood Plan in place. In areas of the borough where these circumstances apply, there is flexibility for the Council to allocate the NCIL in a different area to where it was collected.

<p>It is noted that a higher CIL rate is charged in the Western and Central zones of the borough. If this causes fairness issues then the Council should fix the charging rates instead of pursuing redistribution. The Council has proposed an uplift in the CIL charges in the east of the borough that will reduce the disparity between areas.</p>	<p>Current CIL charges (including indexation) for residential development in the borough are as follows:</p> <p>Western Charging Zone £370.33 per square metre Central Charging Zone £230.59 per square metre Eastern Charging Zone £20.96 per square metre</p> <p>The residential CIL rate for the Western Charging Zone is over 17 times that of the Eastern Charging Zone per square metre and the residential CIL rate for the Central Charging Zone is 11 times that of the Eastern Charging Zone per square metre. In these circumstances, the allocation of NCIL based purely on where it was received does not support the Council's aims of fairness and equality.</p> <p>The law requires that CIL charging rates are set having regard to financial viability. The Council could choose to equalise CIL rates across the borough, however this could only be done by setting the rate at lowest common denominator i.e. the rate viable in the area of the borough with the most challenging economic viability. This would mean losing out on significant amount of CIL income in areas with potential to contribute a higher level of CIL. It is not therefore a suitable option.</p> <p>The Council published a Draft Charging Schedule for consultation in December 2019 which proposed increasing the CIL rate for residential development in the east of the borough to £50 per square metre. While this increased rate would help reduce the disparity between areas, the allocation of NCIL based purely on where it is received would continue to be an unfair approach.</p>
<p>The shortage of NCIL funds in the east of the borough is the result of council policy to charge a minimal rate of CIL in those areas. It is assumed that the lower residential CIL rate in the east of the borough is intended to promote development.</p>	<p>The Council's charging rates for the east of the borough were determined having regard to the financial viability of development. The law does not allow Councils to use CIL as a tool to promote or discourage development in specific locations and this is not the case in Haringey.</p>
<p>Current discrepancies in NCIL available are only temporary and will change in future depending on where the focus of development has moved.</p>	<p>The Council recognises that discrepancies between areas are partly a function of the level of development in each area. However, to a much greater extent the discrepancies are a function of substantial differences in CIL rates between areas. The residential CIL rate for the Western Charging Zone is over 17 times that of the Eastern Charging Zone per square metre and the residential CIL rate for the Central Charging Zone is 11 times that of the Eastern Charging Zone per square metre. Under the existing governance arrangement, large differences in CIL rates will always mean that the east of the borough receives much less NCIL. For this reason,</p>

	<p>spending NCIL only in the area where it is received is not considered to be fair.</p>
<p>Redistribution negates the point of the NCIL, which is to mitigate the impact of new development/make developers contribute to the betterment of the neighbourhood in which they develop.</p>	<p>The primary mechanism through which the Council seeks to mitigate the impacts of new development on local communities is Section 106 planning obligations. These are sought from major developments in order to address the infrastructure needs that arise from them. The Council acknowledges that NCIL is a key funding source to secure the betterment of neighbourhoods in which new development takes place and is fully supportive of NCIL being used for these purposes. It does not consider, however, that spending NCIL only in the areas in which it what collected is fair. This is because CIL rates vary substantially between different areas. It is also the case that some areas of the borough have higher levels of investment need than other. Allocation of NCIL based purely on where it is received does not support the Council's aims of fairness and equality.</p>
<p>Funds have been fairly accrued in Area 4 as a result of significant development in the area. New developments create additional demand for infrastructure which requires funding. The higher amounts raised in Area 4 reflect that the area has received more development. Redistribution would be unfair.</p>	<p>The Council acknowledges that NCIL funds in Area 4 have been raised as a result of new development within Area 4. It is also recognised that new development creates additional demand for infrastructure which requires funding. However, the higher amounts raised in Area 4 are not entirely reflective of the area receiving more development than other areas. The east of the borough has also experienced high levels of development. This too has created additional demand for infrastructure which requires funding. Due to CIL rates being far lower in the east part of the borough however, the total amount of CIL collected is substantially lower and therefore the NCIL allocation is also substantially lower. In these circumstances the Council does not consider that existing governance arrangement is fair.</p>
<p>Area 4 needs significant investment in infrastructure. Funding is needed to address a range of local issues which the Council says there is no other funding for. Requests for small local projects have been denied due to lack of funding. Wood Green is a key visitor destination and this should be reflected in NCIL funding for Area 4</p>	<p>NCIL should be seen in the context of other contributions from developers such as Section 106 (S106) planning obligations and Strategic CIL. It is not therefore the only way in which areas get benefits from development. The Council recognises that Area 4 requires investment in infrastructure. A range of investment needs for Wood Green and the surrounding area are set out in the Council's IDP 2016. These investment needs recognise the key role of Wood Green as the borough's only Metropolitan Town Centre and also as an identified Opportunity Area and a Council focus for regeneration. It is however the case that there are other areas of the borough with an equal or greater investment need. The Council does not consider that a policy of spending NCIL only where it is raised is fair as this has no regard to infrastructure need or infrastructure priorities.</p>

<p>Tottenham and Seven Sisters have received significant public sector funding. The west of the borough does not require NCIL redistribution. NCIL is required in Area 4 to be used locally to help alleviate some of the inequalities across the Borough.</p>	<p>The Council recognises that Area 4 requires investment in infrastructure. It is however the case that there are other areas of the borough with an equal or greater investment need, for examples Areas 5 and 6. The Council does not consider that a policy of spending NCIL only where it is raised is fair as this has no regard to infrastructure need or infrastructure priorities.</p>
<p>Redistribution could see much needed funds being transferred from Area 7 (Tottenham Hale and surrounds) to areas which have seen little development (e.g. Area 6).</p>	<p>The existing Governance arrangements do not produce an NCIL allocation that reflects different levels of development or infrastructure need across the borough. The consultation document identifies key principles for redistribution including that NCIL amounts for each area reflect the amount of development that has taken place in an area and the need for investment in an area. The Council therefore considers redistribution will facilitate a better allocation of NCIL funding.</p>
<p>The Council could use Strategic CIL to address the perceived unfairness of NCIL.</p>	<p>The Council could use Strategic CIL (SCIL) to address the unfairness of the current NCIL arrangements, however it does not consider that this would be a good use of SCIL. SCIL is a much larger pot of money than NCIL and is intended to help fund the borough's key infrastructure priorities identified in the IDP as being necessary to support the growth proposed in the Local Plan. Legislation provides that the scope of spend of NCIL is greater than SCIL therefore it is also not possible to simply substitute the funding types. Using SCIL to address the unfairness of the existing arrangement would also not address the fundamental reason for the unfairness.</p>
<p>The proposed changes turn the entirety of CIL money into a pot for borough-wide infrastructure/projects. That creates two linked risks. Firstly, that an increase in development within an area will not be matched by greater NCIL funding to mitigate the impact on the local area an increase in population will have. Secondly it risks undermining support for new development. If development is to proceed it can only succeed with the support of the community in which it occurs. It is essential that the community affected by development receives some direct benefit. The changes will increase opposition to development.</p>	<p>The consultation document identifies key principles for redistribution including that NCIL amounts for each area reflect the amount of development that has taken place in an area and the need for investment in an area. The Council acknowledges the importance of, and need for, community support for development. The Council's preferred approach can continue to ensure that there remains support for development within the borough. It is proposed that any future NCIL redistribution would factor in the level of development that has taken place in an area. Areas of the borough which experience lots of development would therefore see this reflected within their NCIL allocation. The east of the borough has low CIL rates and therefore the level of NCIL collected to date in Areas 5,6 and 7 has been very low. It is considered that a fairer system for the allocation of NCIL would increase overall support for development as all areas of the borough rather than a select few with a high CIL rate would have access to a meaningful level of NCIL funding.</p>
<p>It is unfair that Neighbourhood Forums not only receive a higher percentage of NCIL, but they will be allowed to keep all the NCIL they collect.</p>	<p>Planning Practice Guidance is clear that 25% of NCIL collected in an area with a Neighbourhood Plan should be spent in an area. This is a key incentive by Government to encourage communities to produce Neighbourhood Plans.</p>

	<p>The Council does not allocate 25% to a Neighbourhood Forum until there is a 'made' Neighbourhood Plan covering the Forum Area. Currently the borough has one adopted Neighbourhood Plan in Highgate and it is therefore appropriate to ringfence 25% of CIL receipts collected in that area for projects identified in the Neighbourhood Plan for that area and through discussions with the Neighbourhood Forum.</p>
<p>The proposal is to pool the neighbourhood proportion of CIL receipts raised from across the borough (except for identified Neighbourhood Forum areas). Neighbourhood Forums are most likely to develop in more affluent areas. These areas could however have money redistributed to them under the proposals. This would serve to further increase inequalities across the borough.</p>	<p>The Council notes that redistribution has potential to effect inequalities in the borough. The consultation document identifies key principles for redistribution including ensuring fairness and that NCIL amounts for each area reflect the amount of development that has taken place in an area and the need for investment in an area. The Council therefore considers that there is an opportunity to ameliorate inequalities rather than exacerbate them.</p>
<p>Developers may have a case to challenge CIL payments if they are not going to be spent for the purposes originally intended.</p>	<p>CIL charges are mandatory and non-negotiable. Any decisions the Council makes in relation to the allocation of NCIL will not therefore impact upon CIL collection.</p>
<p>Developers currently know that the NCIL they pay will benefit the occupiers of their development through improved infrastructure in the immediate local area. This certainty may encourage them to proceed with development in areas where otherwise they might not, e.g. due to poor surrounding infrastructure. There may be circumstances in which desirable development does not proceed because of the proposed changes.</p>	<p>The Council does not consider that the redistribution of NCIL will have any bearing on developer decisions to proceed with schemes. Planning policy requires development only to come forward where the necessary impacts can be mitigated and this would be secured as normal through a Section 106 (S106) planning obligation associated with a planning permission. NCIL should be seen in the context of other contributions from developers such as Section 106 (S106) planning obligations and Strategic CIL. It is not therefore the only way in which areas get benefits from development.</p>
Other points raised	Council response
<p>Changes to NCIL allocation would lead to a loss of accountability. The existing system is unambiguous and easy for officers to apply. Without the existing simple and transparent mechanism, decisions on the allocation of funds by the Council may be, or may be suspected of being, subject to political, personal or commercial influences that are not directly relevant to local infrastructure needs. This creates a risk of legal challenge. There needs to be a transparent reallocation that is open to public scrutiny. The decision to 'redirect' an NCIL allocation should be formally agreed by elected Members rather than being a delegated responsibility.</p>	<p>Any decisions that the Council takes in relation to changing the current NCIL allocation arrangement will be made in a transparent way having regard to the responses to the consultation responses on changes to the CIL Governance document.</p>
<p>The Council has provided insufficient clarity about what a fairer distribution might look like. Before the Council changes the Governance document the Council should indicate its plans for redistribution so that</p>	<p>The consultation was purely about the principle of spending NCIL in areas other than where it was collected. The consultation document did however identify key principles for redistribution including ensuring fairness and that NCIL amounts for each</p>

the real impact of the proposed wording change is understood.	area reflect the amount of development that has taken place in an area and the need for investment in an area.
The consultation would have benefitted from additional detail on the drivers behind the large accrual of NCIL monies in Area 4 relative to the other areas.	Comment noted
Changes to the CIL Governance document should ensure that if any money redistribution takes place, it supports disadvantaged areas and communities. A strategic pledge could be made by the Council to indicate that there would be clear prioritisation of the funds in less affluent areas. This would alleviate worries that more prosperous areas of the borough were being prioritised ahead of the less well off.	Comment noted
If redistribution is to take place there should be safeguards in place to ensure every area receives a fair sum of funding.	Comment noted
The Council should consider an approach where it allows the existing NCIL balances to be spent within the neighbourhoods they've been collected in but that going forward NCIL is redistributed based on a fairer approach.	While the Council acknowledges why this approach to redistribution would be favoured by residents of Areas who have accrued high amounts of NCIL to date, this approach would not be fair as it does not address the imbalances in accrued NCIL which has resulted from significantly different CIL charging rates across the borough.
CIL monies should be spent within a certain radius of the contributing development. This will allow for transparency and accountability and ensure it benefits the people who are directly impacted by new development regardless of ward boundaries. The radius could be calculated based upon the population increase brought about from a development.	The Council notes the benefits of such an approach. However, this approach would be extremely complex to administer as individual NCIL contributions would all have to be spent within a different radius. This approach would require considerable changes to the Council's existing governance approach which divides up Haringey into 9 NCIL areas.
NCIL funding should be used to reduce business rates and /or council tax	NCIL cannot legally be used for this purpose. It is required to be spent on infrastructure or 'anything else that is concerned with addressing the demands that development places on an area'. NCIL cannot be relied on in such a way as a sustainable and stable source of funding to be able to guarantee and administer this proposal.
The Council has been too slow to invest NCIL already collected. It is now more than 18 months since a consultation on NCIL project spending started with no outcome.	While the Council's CIL charging schedule came into effect in 2014, CIL funds have taken some years to build up. CIL is paid upon commencement of a development on site, so there is a time lag between developments being CIL liable and then paying. The Council and its Housing and Regeneration Scrutiny Panel considered the governance process for NCIL in 2015-16, Cabinet adopted its approach in 2017 and in 2018 the Council consulted on what NCIL funds should be spent on ('Round 1'). Now that consultation on changes to the Haringey CIL Governance document has

	concluded the Council is in position to make decisions on NCIL spending.
There is no visible mechanism as to how communities can request use of NCIL in their Area.	In 2018 the Council carried a Round 1 consultation seeking the community's views on what NCIL funds should be spent on. A total of 559 responses were received. A second consultation about projects for spend ('Round 2') will take place later in 2020 which will provide residents with a further opportunity to identify priorities or specific projects for NCIL spend. The Council does not consider that it would be practical to have an ongoing request process. Now that consultation on changes to the Haringey CIL Governance document has concluded the Council will decide on Round 1 NCIL spending having regard to the Round 1 consultation responses and other relevant factors.
Concerned that there is not a joined-up approach to spending NCIL funds.	The Council's approach to spending CIL is outlined in the Haringey CIL Governance document. To ensure a joined-up approach it sets out a range of criteria for prioritising projects to be funded by CIL. Each project should be measured against these to ensure the most appropriate use of limited funding.
Should the proposed changes take effect, there is a risk that those who are most engaged with community initiatives (and therefore most able to bid for money), or those able to lobby and galvanise the highest volume of support, will wind up receiving the bulk of funding, even though this may bear little relation to where the greatest need for investment is.	The consultation document identifies key principles for redistribution including ensuring fairness and that NCIL amounts for each area reflect the amount of development that has taken place in an area and the need for investment in an area.
The consultation has not been adequately publicised	The Council has publicised the consultation in the same way as other recent planning consultations. Emails were sent to all individuals and parties on the council's planning policy consultation database. The database includes several hundred individuals plus a large number of community and civic groups who are active in the borough. A second consultation about projects for spend ('Round 2') will take place later in 2020 which will provide residents with a further opportunity to identify priorities or specific projects for NCIL spend. This will include significant engagement with the borough's communities.

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Appendix B Round 1 Consultation Responses Summary (organised by Borough Plan priority)

Priority	Outcome	Objective	Project	Comment	Quantity
Housing	2-Reduce homelessness	c) End street homelessness	Shelters for homeless people		1
People	5- Happy childhood	a) Outstanding schools	St James School	Improve school buildings	1
			Tetherdown Primary	Improve school buildings	1
			Coleridge Primary School	Improve school buildings	2
			North Harringay Primary School	Redevelopment of the roof garden	2
			Bruce Grove Primary School	Improvements to school grounds and buildings, particularly toilets in the upper school	1
		c) Children and young people are physically and mentally well	St Ann's CE Primary School	Transform playground into a Sensory/Science/Environmental garden.	1
	8-Strong Communities	b) Strong and diverse Voluntary Community Sector	Chapmans Green	Improved pavilion and pop up café to	1
			Support for formation of new neighbourhood groups	1	
Place	9- A healthier, active and greener place	a) Protect and improve parks and green space	Albert Road Recreation Ground	Lighting, gym equipment, better playground	1
				New or improved play facilities	3
			Cranley Gardens	Tree Planting specifically	1

			replacement Cherry Trees	
		Barrarat Ave and Wolseley Road	Revitalise green conservation area	1
		Replanting of new trees in locations where trees have been removed		3
		Alexandra Park	Improve the playground	2
		Clifton Road N22	Tree replacement	1
		Lansdowne Road Dukes Avenue	Tree Planting	1
		Cranley Gardens	Tree Planting	1
		Osier Crescent Tree Planting	Trees planting	1
		Lynmouth Road, Fortis Green, London N2 9LS.	Plant trees on both sides of the street to match surrounding roads	1
		Warner Estate N8: Baden Rd. Clovelly Rd. Danvers Rd. Linzee Rd. Park Avenue North, Priory Avenue, Priory Rd. Redston Rd. and Warner Rd.	Replace mature street that have been lost	2
		Muswell Hill Road Tree Planting	Address area around the Odeon cinema and organic shop	1
		Rosebery Road and Cranbourne Road N10	Replacement of previously removed trees	1

			Lansdowne Road Dukes Avenue	Tree Planting	1
				Tree Planting	4
			Priory Park N8	Refurbish and maintain the whole park including children's play area	57
			Muswell Avenue between Barnard's Hill and Goodwyn's Vale	New trees for Muswell Avenue between Barnard's Hill and Goodwyn's Vale	1
			Newland Road	Open playground on Newland Road at weekend	1
			Finsbury Park	Playground and water feature to be restored and improved. Improve sidewalks and lighting for roads like Mount View Road.	1
			Tree Planting		1
			Campsbourne Estate N8	Small children's play area	1
			Stationers Park	New or improved play facilities	1
			Linzee Rd, Baden, Rd, Priory Avenue, Clovelly Rd, Park Avenue North, Redston Rd, Warner Rd, Danvers Rd.	Replacement of trees previously removed	1
			Farrer Road	Replacement of trees previously removed	1
			Woodside Park	Improve the facilities and general feel of Woodside Park	3

			Springfield Park	Improve playground and community pond area. Control or manage fly tipping. Installation of a drinking fountain/water bottle filler.	3
			Wood Green Common – in the small park outside of Heartlands High School	Improve the Wood Green Common playground for young children	3
			Albert Road Recreation Ground	New or improved play facilities	1
			Bounds Green Rd, opposite The Ranelagh pub	The area opposite the Ranelagh pub should be made into a children's playground	1
			Finsbury Gardens/ Truro Road	New or improved play facilities	1
				New or improved play facilities	1
			Chapmans Green	New children's playground next to the pavilion	1
			Fairland Park, N8	Maintenance and rejuvenation of Fairland Park playground	1
			Russell Park	New or improved play facilities	1
			Finsbury Park	Play equipment	1
			Downhills Park	New or improved play facilities	1
				Tree Planting	1
			Park Lane N17 0HJ and Rothbury Walk N17 0PW	Installing planters around street and estate trees, and filling them with bulbs	1

			Chestnuts park playground	Chestnuts park playground improvements	3
			Belmont Rec	Improvements to Belmont Rec	1
			Elizabeth Place	Playground upgrade including lighting for the football pitch. Funds to start community gardening project. Improved parks maintenance.	1
			Boundary Road	Tree Planting	4
			Hartington Park	New or improved play facilities	10
			Clyde Circus	Tree Planting	1
			Napier Road	Tree Planting	1
				More tree planting generally	1
			Clyde Circus	Plant more trees	1
		b) Increase levels of physical activity	Refurbish Fortismere School swimming pool		2
			Priory Park Tennis Courts	Refurbish the West Courts	1
			Alexandra Park at bottom of what used to be old ski slope	Adult outdoor exercise machine/ gym area	1
			Bruce Castle Park	Outdoor sports equipment in Bruce Castle Park	1
				New or improved play facilities	1
			Tottenham Green Pool		1
		c) Improve air quality		Measures to reduce pollution	1

			The Roundway/A10 to the east, White Hart Lane to the north, High Road/A105 to the west and Lordship Lane to the south.	Liveable neighbourhood scheme covering part of Area 3 and 5	1
		d) Reduce CO2	Electric vehicle charging ports		1
			Electric vehicle charging ports	Many more charging points	1
	10- A cleaner, accessible and attractive place	a) Safe and accessible roads, pavements and public space	Bedford Road	Speed camera	1
			Queens Avenue	Levelling of footpaths	3
			Durnsford Road	Speed camera along Durnsford Road (Alex ward end)	1
			Hillfield Park	Footpath in a bad state of repair	1
			Muswell Hill Broadway and Roseberry Road	Road, footpaths and tree planting	1
			Woodland Gardens	Road and footpaths	1
			Woodside Avenue	Footpath in a bad state of repair	1
			Colney Hatch Lane	Road and footpaths	2
			Fortis Green south side to Midhurst Road	Road is in a terrible state	1
			Pages Lane	Traffic calming measures	2
			St James's Lane N10	Traffic calming on St James's Lane	1
			Osier Crescent	Traffic calming measures	1

			Creighton Avenue	Remove road humps	2
			Road island at the junction of Tetherdown and Pages lane	The painted road island and markings should be repainted and signage improved as matter of priority	1
			Woodside Avenue and Great North Road Junction	Poor road surface	1
			Wood Vale	Traffic calming measures	1
			Alexandra Park Road	Zebra crossing needed opposite St Andrews Church	1
			Firs Avenue	Road and footpaths	2
			Coldfall Avenue	Remove existing speed humps	1
			Alexandra Park Road	Remove double yellow lines to just beyond West end of St Saviours Court	2
			Durnsford road N11 2	Speed camera on Durnsford road	1
			Durnsford road N11 2	8-tonne (or less) limit on vehicle weight on Durnsford Road	1
			Atheneum Place nearby Sainsburys Muswell Hill	Maintenance of side roads in Fortis Green	1
			Durnsford Road N11 2	Permanent repair to the road surface on Durnsford Road N11 2 (over the railway)	1
			Baronsmere/Southern Road	Dangerous pavement and poor lighting	1

			Coldfall Wood	Coldfall Wood footpath improvements where the woods meet the playing fields.	1
			Sunshine Garden Centre	Resurfacing of footpaths to west of and behind Sunshine Garden Centre. Lighting along footpath to west of Sunshine garden centre.	1
			Albert Road	Traffic calming	3
			Junction of Muswell Avenue South and Alexandra Park Road	Improvements to pedestrian routes/safety N10 - build out pavement to slow traffic entering Muswell Avenue South from Alexandra park road and incorporate dedicated cycle track round corner.	1
			N22. Triangle between Alexandra Park, the railway, and Albert/Durnsford road.	Address use of local roads as a through route for traffic	1
			Fortis Green zebra crossing close to N10 3EJ	Improve crossings on Fortis Green opposite the Fortis Green shops and near Summerlee Avenue.	2
			Fortis Green Road - N10 3ES	Replace the zebra crossing with a crossing which uses pedestrian controlled lights or raise the crossing point so that cars slow down	2
			Junction where Park Road N8 and Muswell Hill N10 join.	Redesign the junction to make it better for cyclists and pedestrians	1

			Bedford Road N22	Road safety measures on the bend where it joins the road exiting Alexandra Park (South Terrace).	1
			Clovelly Road	Pavement improvements	1
			Quernmore Road & Railway Approach, N4	Bridge over the railway between these two roads.	1
			Hornsey Road	Road and footpath improvements	1
			Mayfield Road	Road and footpath improvements to include the surrounding areas	1
			Middle Lane	Traffic calming and road and footpath repairs. Cycling paths and improvements to libraries, community centres school and sports facilities are also a priority.	1
			Brownlow Road	Traffic calming measures	1
			Turnpike Lane	Road and footpath improvements	1
			Wightman Road	Mitigation of traffic impacts on the Ladder roads	1
			Turnpike Lane	Reconfiguring and relaying roads Improvement to pavements	1
			Rivulet Road	Road and footpath improvements	1
			Lordship Lane/Downhills Way crossroads	Traffic calming measures	1
			Willoughby Lane	Traffic calming measures	1
			Willoughby Lane	Road and footpath improvement	1

			Langham Road (N15 - between Belmont & West Green),	Removal of through traffic on Langham Road. Removal of through traffic from Woodlands Park Road. Change Avenue Road and Cornwall Road one-way systems to remove through traffic	1
			West Green Road	Traffic calming measures	1
			Bruce Grove	Pavements from 26 Bruce Grove until Lordship lane	1
			Lawrence Road entire length	Road and footpaths improvements	1
			The Avenue (between Mount Pleasant Rd & Broadwater Rd	Traffic calming	1
			Corner of Mount Pleasant Road and Fairbourne Road	Road and footpath improvements	1
			Tynemouth Road and Antill Road	Issues with road surface due to HGVS	1
			Mt Pleasant and The Avenue	Zebra crossing at Mt Pleasant and The Avenue.	1
			Philip Lane (near to Mount Pleasant and Kitchener).	Replace the footpath in front of the Philip Lane shops	1
		b) Improve cleanliness and reduce fly-tipping	Twyford Avenue bus stop traveling east	Waste bin needed	1
			Turnpike Lane area	Measures to prevent fly tipping and managing waste disposal	1

				Campaign to raise awareness of littering and to stop fly-tipping and dumping	1
				CCTV for flytipping hotspots	1
		c) Attractive and well-maintained public realm	Parkland Walk bridges	Bridges need urgent brickwork repairs to keep them clear of damaging vegetation	1
			276 Alexandra Park Road, N22	A new bench outside 276 Alexandra Park Road	2
				Public sculptures e.g. opposite St James' Church and at the junction of Alexandra Park Road and Durnsford Road	1
				Refurbished public benches in Muswell Hill and Fortis Green.	1
			Bluebell Wood, Winton Avenue, Blake Road	Gravel path needed south side of the wood to protect flowers	1
			Redston Road, N8	Address issue with rubbish bins on pavement	1
			Bounds Green Road	Improvements to shopping area around tube station. Paint the bridge over Bounds Green Rd. Reduce pollution around Bounds Green School.	1
			Turnpike Lane area	Removing street clutter and improve shopfronts	1
			Turnpike Lane area	Planting trees and installing street furniture	1

			Philip Lane at Downhills Park Road	Improve shop fronts	1
			Seaford Road	Improving the streetscape environment	1
				Start a community skip day once a month for people's unwanted bulk items. Beautify certain dumping hotspots.	4
		d) Minimise waste and increase recycling	Belmont Rec, Downhills Park and Lordship Rec	Measures to tackle rubbish	1
11- A culturally engaged place	a) Accessible spaces for young people and children		Increased quantity of community centres	Lack of meeting places	4
			Improvement of Albert Road Pavilion	Needs general support	1
			CUFOS The Avenue	Needs general support	1
			Nightingale Road Estate and around Grenville Rd	Need to develop youth provision	1
			Chapmans Green	New community meeting facility	1
			Chestnuts Park Community Centre	Improvement of community centres	1
			Selby Centre, Selby Road, N17 8JL	Improvement of community centres	1
	b) Foster a strong and diverse cultural offer		Improvement of Muswell Hill Library	Improved accessibility including lift provision and toilet improvements	259
			Muswell Hill Synagogue improvement		1

			Stroud Green and Harringay Library		1
			Bounds Green and Woodside	Improvement of local libraries	1
			Harringay and Noel Park	Improvement of local libraries	1
		c) Improve connectivity	General improvement of cycling facilities		7
			Muswell Hill improved cycling facilities		1
			234 Bus Stops	234 bus stop shelters	1
			Albert Recreation Ground cycling facilities		1
			Bounds Green Road and Green Lanes	Improve cycling facilities	1
			Canal towpath, Stoneleigh Road	Improve connectivity and encourage cycling way from the High Road	1
			Nelson Road	Bicycle hangar needed	1
			Ferry lane and through the bus station and junction round to Broad Lane	Joining up of existing cycle paths	1
	12- A safer borough	a) Reduce fear of crime and build CCTV stock	Improve lighting on Coldfall Estate		2
				Increased police presence	2
			Alexandra Park lighting	Lights on at night	1

			Creighton Avenue allotment lighting	Allotment lighting	1
			Fortis Green road lighting	Lighting Collingwood Avenue Junction	2
			Queens Avenue	CCTV	1
			Bedford Road	Lighting and CCTV	1
			Coppetts Road and Osier Crescent	CCTV	1
			Church Vale & Twyford Avenue	Lighting and safety improvements needed	1
			Campsbourne Estate	CCTV	1
			Bowes Park station and alleyway	CCTV	2
			Woodside Park	CCTV	1
			Glendale Avenue, N22 5AH	CCTV to address flytipping and anti-social behaviour	1
			High Road, Station Road, Turnpike Lane, Lordship Lane, Westbury Road – N22	Improve/extend CCTV system within Wood Green Town Centre. Install a good quality Town Centre Radio System.	1
			Turnpike Lane area	Installation of CCTV cameras on and around Ducketts Commons; Turnpike Lane Station and Haringey Passage	1

			Turnpike Lane area	Improved lighting on Ducketts Common, Haringey Passage and along the side roads leading to Turnpike Lane.	1
			Elizabeth Place	CCTV needed to address Anti Social Behaviour	1
			Railway bridge on West Green Road	Feature lighting under the railway bridge	1
			Holcombe Road/ Tottenham High Road	CCTV to address Anti Social Behaviour	1
			Napier Road alleyway to Sperling Road	CCTV	1
			Tynemouth Road, Copperfield Drive	Lighting improvements to improve safety of area	1
Economy	13- Growing economy	e) Support town centres and high streets	Frome Rd, including Mannock Rd Junction	Clean up roads around Turnpike Lane. Incentivise business/retailers to be established on the high street Turnpike Lane end. Make Turnpike Lane and Frome Road area cleaner and safer.	1
	16- Regeneration	a) Regeneration for the benefit of communities in Tottenham and Wood Green		Community plans for Wards Corner / Market and the social infrastructure elements of the START project	1
		b) Take account of community feeling when regenerating areas	Latin Village, Seven Sisters	Refurbish the Latin Village	2

Appendix C - Detailed Project Descriptions for Consultation Round 1 spend

Library improvements

Ref Number- 1

Muswell Hill Library Accessibility Improvements

Area 1- Alexandra, Muswell Hill and Fortis Green

Indicative Cost- £271,459 contribution to £357,000 full cost

Responses- 259

Muswell Hill Library is a Grade II listed building in need of various enhancements. Some improvements are currently underway, however at present there is no allocated funding for accessibility improvements. It is hoped that by the time the project is ready to go to tender that the additional required funding could be available, which could include Neighbourhood CIL.

The accessibility improvements will look at providing a new glazed main entrance to the west side of the building with a new passenger lift to provide access from street level to the ground and first floor. They will also look at providing accessible toilet to the ground and first floor and a reconfiguring the staff toilet on the first floor.

Accessibility improvement works to Muswell Hill Library was the most common response during the Round 1 Consultation process- over 46% of total responses addressed this one project.

Library accessibility works fulfil Outcome 11 the Borough Plan regarding 'A culturally engaged place', specifically objectives 11a and 11b which aim to:

- Provide accessible, quality spaces for people to come together, especially for young people
- Foster a strong and diverse cultural offer

Ref Number- 2e

Stroud Green and Harringay Library

Area 2- Hornsey and Stroud Green

Indicative Cost- £55,806 contribution to £180,00 full cost

Responses- 2

The first floor at Stroud Green Library is currently permitted for residential use. To enable the space to be used by the staff and the community it requires a change of use planning application. This would allow the first floor space to be used for staff welfare facilities in the short term subject to existing staircase being able to be used. For the first floor to be used as a community space the staircase will have to be completely removed and a new staircase and lift installed in the perimeter of the existing stairwell. Locating the lift within the reconfigured stairwell means that works could be delivered without major impacts on the use of the library.

There were 2 responses in the 2018 Round 1 Consultation regarding libraries in the Stroud Green and Hornsey area.

Library accessibility works fulfil Outcome 11 of the Borough Plan regarding 'A culturally engaged place', specifically objectives 11a and 11b which aim to:

- Provide accessible, quality spaces for people to come together, especially for young people
- Foster a strong and diverse cultural offer

Re-deployable cameras

Ref Number	Project	Area	Indicative Cost	Responses
2a	Re-deployable cameras x1	2 (Hornsey and Stroud Green)	£11,000	1
3a	Re-deployable cameras x2	3 (Bounds Green and Woodside)	£22,000	4
4a	Re-deployable cameras x2	4 (Noel Park and Harringay)	£22,000	3 (including WGBID and TPLJSWG)
5a	Re-deployable cameras x2	5 (White Hart Lane and Northumberland Park)	£22,000	Cross-borough responses
6a	Re-deployable cameras x3	6 (St Ann's, Seven Sisters and West Green)	£33,000	Cross-borough responses
7a	Re-deployable cameras x3	7 (Bruce Grove, Tottenham Green and Tottenham Hale)	£33,000	4

NCIL funds could be used to extend the number of re-deployable cameras in the borough. In the Turnpike Lane area the cameras would be different to those subsidised by the Wood Green Business Improvement District. These will be additional and complementary to the Council's wider CCTV capital programme, though officers will manage procurement, deployment and maintenance through the overall programme to ensure the most efficient and effective roll out.

During the 2018 Round 1 Consultation there were 25 community responses from across the Borough regarding extension of the Council's CCTV stock. Greater CCTV coverage around the Wood Green and Turnpike Lane area was mentioned in the 2018 Consultation by the Wood Green Business Improvement District. The Turnpike Lane Joint Strategy Working Group also made a submission concerning CCTV coverage at Turnpike Lane, Ducketts Common and Harringay Passage.

Having re-deployable cameras across Haringey aligns to Outcome 10 in the Borough Plan, 'a cleaner safer and attractive place.' Objective 10b explicitly aims to reduce

fly-tipping, with re-deployable cameras having the capacity to bolster fly-tipping enforcement. Greater CCTV coverage aligns to Outcome 12 'A safer borough' within the 'Place' Priority of the Borough Plan.

On-street waste containment

Ref Number	Project	Area	Indicative Cost	Responses
2b	On-street waste containment x2	2 (Hornsey and Stroud Green)	£10,000	1
3b	On-street waste containment x2	3 (Bounds Green and Woodside)	£10,000	Cross-borough
4b	On-street waste containment x2	4 (Noel Park and Harringay)	£10,000	Responses from TPLJSWG
5b	On-street waste containment x2	5 (White Hart Lane and Northumberland Park)	£10,000	1
6b	On-street waste containment x3	6 (St Ann's, Seven Sisters and West Green)	£15,000	1
7b	On-street waste containment x3	7 (Bruce Grove, Tottenham Green and Tottenham Hale)	£15,000	1

NCIL funds can be used to cover the installation of aesthetically pleasing bespoke waste containers for use for flats above shops. Currently, there is little current provision of this across the Borough. These containers are needed across the Borough in all areas which have a parade of shops

In addition to 5 responses which addressed waste, there were also 16 responses which could be considered to address the 'beautifying of public realm' which the new containers would contribute to.

On-street waste containment would closely align to Objective 10 'A cleaner, accessible and attractive place' within the Place Priority of the Borough Plan. Specifically, Objectives 10b and 10c would be met as these are concerned with minimising fly-tipping and maintaining an attractive public realm.

Bike Hangars

Ref Number	Project	Area	Indicative Cost	Responses
2c	Bike Hangars x1	2 (Hornsey and Stroud Green)	£5,000	Cross-borough responses concerning an
3c	Bike Hangars x2	3 (Bounds Green	£10,000	

		and Woodside)		improvement to cycling facilities
4c	Bike Hangars x2	4 (Noel Park and Harringay)	£10,000	
5c	Bike Hangars x2	5 (White Hart Lane and Northumberland Park)	£10,000	
6c	Bike Hangars x3	6 (St Ann's, Seven Sisters and West Green)	£15,000	
7c	Bike Hangars x3	7 (Bruce Grove, Tottenham Green and Tottenham Hale)	£15,000	1 specific response for this area concerning a bike hangar

Bike hangars encourage active travel by allowing cyclists a safe place to store their bike in a way which is sometimes not offered by their home. Bike Hangars would align to Objective 9b within the Borough Plan by encouraging people to increase their levels of physical activity in the Borough. Bike hangars would also improve the connectivity of the Borough which falls under Outcome 11 'a culturally engaged place'.

Park Improvement Projects

Ref Number	Project	Area	Indicative Cost	Responses
2d	Priory Park Sports and Play Area Enhancements	2 (Hornsey and Stroud Green)	£100,000	58
3d	Woodside Parks Play Area and landscaping improvements	3 (Bounds Green and Woodside)	£46,000	4
3e	Chapman's Green New Play Area	3 (Bounds Green and Woodside)	£20,000	1
3f	Springfield Park enhancements	3 (Bounds Green and Woodside)	£10,000	3
4d	Wood Green Common playground update	4 (Noel Park and Harringay)	£50,000	3
5d	Bruce Castle Landscape Enhancements	5 (White Hart Lane and Northumberland Park)	£50,000	1
5e	Bruce Castle Renovate multi-use games areas for various sports	5 (White Hart Lane and Northumberland Park)	£140,000	1
5f	Tower Gardens Landscape	5 (White Hart Lane and	£30,000	Cross-borough

	Improvements to go Pesticide Free	Northumberland Park)		
6d	Lordship Recreation Ground- Changing Places accessible toilet	6 (St Ann's, Seven Sisters and West Green)	£65,000	2
6e	Downhills Park- Tennis Court	6 (St Ann's, Seven Sisters and West Green)	£100,000	3
7d	Hartingdon Park Landscape Improvements	7 (Bruce Grove, Tottenham Green and Tottenham Hale)	£30,000	10
8a	BMX Track	Highgate Neighbourhood Forum Area	£170,000	Highgate Neighbourhood Forum priority
8b	Parkland Walk Play Area	Highgate Neighbourhood Forum Area	£90,000	In the Neighbourhood Plan

There are many different individual projects for parks and green space improvements, as set out in this table.

Park and green space improvements align to Outcome 9 'A healthier, active and greener place' within the Place Priority of the Borough Plan. Specifically, it will help achieve Objectives 9a and 9b which aim to:

- Protect and improve parks, open space, and green space, promoting community use
- Increase levels of physical activity across the borough.

Tree Planting

Ref Number	Project	Area	Indicative Cost	Responses
7e	Tree Planting	7 (Bruce Grove, Tottenham Green and Tottenham Hale)	£24,000	4
8c	Tree Planting	Highgate Neighbourhood Forum Area	£24,000	Highgate Neighbourhood Forum priority

Costs include the cost of trees, stakes, ties, watering pipes, tree pits and 3 years of after care to ensure establishment.

Tree Planting schemes align to Outcome 9 'A healthier, active and greener place' within the Place Priority of the Borough Plan. Objective 9c to 'improve air quality, especially around schools' will be met which fits in with the Council's climate change priority. Moreover, trees 'provide an attractive and well-maintained public realm' which is Objective 10c of the Borough Plan.

Youth Space

Ref Number	Project	Area	Indicative Cost	Responses
3g	Wood Green Youth Space contribution	3 (Bounds Green and Woodside)	£50,000	Cross-borough responses concerning community centres and meeting places
4e	Wood Green Youth Space contribution	4 (Noel Park and Harringay)	£150,000	Cross-borough responses concerning community centres and meeting places
6f	Wood Green Youth Space contribution	6 (St Ann's, Seven Sisters and West Green)	£50,000	Cross-borough responses concerning community centres and meeting places

NCIL funds offer an opportunity to progress a Youth Space in Wood Green.

There was a specific consultation response concerning community spaces in Area 4, alongside support for youth provision across the wider borough. The Youth Centre would be an important facility for young people in the Wood Green Area.

A Youth Space in Wood Green would address noted concerns about youth provision and have potential to help address youth crime as part of the Council's wider strategy relating to knife crime. The Youth Space would also address after school activities provision for young people between 3pm and 6pm which is known to be a time when many issues arise with young people. An indicative cost of £250,000 has been put on this project, with £150,000 coming from Area 4, supplemented by £50,000 each from Areas 3 and 6. Young people would need to be engaged in the design of the improvements at the youth space.

A Youth Space in Wood Green would fall within the Place Priority of the Borough Plan, particularly Outcome 11 'A culturally engaged place'. Objective A is particularly relevant as this concerns 'Accessible spaces for young people and children' which is offered by the development of a Youth Space in Wood Green. The People Priority is also relevant, including Outcome 6 'Every young person, whatever their background, has a pathway to success for the future'.

Ref Number 7f

**Bruce Grove Youth Space Improvement Project
Area 7 (Bruce Grove, Tottenham Green and Tottenham Hale)
Indicative Costs- £400,000**

Responses- Cross-borough responses concerning community centres and meeting places

NCIL funds offer an opportunity to support the renovation of Bruce Grove Youth Space. The Project will support improvements to the building and the back garden. Potential works at the front of the building include improved lighting and CCTV coverage, as well as signage and gates. At the back of the building, there are opportunities to improve the lockers and lighting. In the back garden, works may include the installation of floodlighting and the resurfacing of the sports court.

Although there were no specific consultation responses concerning community spaces in Area 7, there was support for youth provision across the wider borough. The Youth Centre is an important facility for young people across the wider Tottenham Area.

Improvements at Bruce Grove address noted concerns about youth provision and have potential to help address youth crime as part of the Council's wider strategy relating to knife crime. Bruce Grove Youth Space would also address after school activities provision for young people between 3pm and 6pm which is known to be a time when many issues arise with young people. An indicative cost of £400k has been proposed made up of c. £100k capital works and £150k for two years with details to be finalised by service providers. Young people would need to be engaged in the design of the improvements at the youth space.

Improvements to Bruce Grove Youth Space would fall within the Place Priority of the Borough Plan, particularly Outcome 11 'A culturally engaged place. Objective A is particularly relevant as this concerns 'Accessible spaces for young people and children' which is offered by improvements to Bruce Grove Youth Space. The People Priority is also relevant, including Outcome 6 'Every young person, whatever their background, has a pathway to success for the future'.

Highways

Ref Number 5g

LGBT+ Crossing

Area 5 (White Hart Lane and Northumberland Park)

Indicative Cost: £10,000

Responses: 6 noting pedestrians and pedestrian safety, some noted crossings, one noted streetscape environment

The Borough Plan also sets out the objective to improve connectivity and safety for pedestrians and cyclists. This is within the Place priority of the Borough Plan. LGBT+ crossings would also support Borough Plan Objective 10c to 'Provide an attractive and well-maintained public realm.'

In the Borough Plan the Council sets out its commitment to equality, including the principle of being able to 'Work with residents and employees to create communities which are able to come together, value diversity and challenge discrimination.' The borough has a proud history of LGBT+ community groups and activities. Within the Council, this commitment to equality, diversity and creating an inclusive environment is evidenced by the popular HarinGAY t-shirts and rainbow lanyards, participation in Pride London, and the celebration of LGBT History Month. There is also a flourishing LGBT+ staff network.

Ref Number 7g

Zebra crossing at Shelbourne Road

Area 7 (Bruce Grove, Tottenham Green and Tottenham Hale)

Indicative Cost: £35,000

Responses: 6 noting pedestrians and pedestrian safety, some noted crossings, one noted streetscape environment

This project would support pedestrian access and connectivity to Harris Primary Academy Coleraine Park. It would align to Outcome 10 of the Borough Plan 'a cleaner, accessible and attractive place.' In particular, Objective 10a seeks to 'provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users.'

Appendix D – Assessment of Round 1 Spend Projects against key criteria

Project	Meets legal requirements for NCIL spend	Meets a Borough Plan Priority	Supported through consultation	Meets Haringey CIL Governance document criteria										
				a	b	c	d	e	f	g	h	i	j	k
Muswell Hill Library Accessibility Improvements	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓
Stroud Green and Harringay Library Accessibility Improvements	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓
Priory Park Sports and Play Area Enhancements	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Woodside Park Play Area and landscaping improvements	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Chapman's Green New Play Area	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Springfield Park enhancements	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Wood Green Common playground update	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Bruce Castle-Landscape Enhancements	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Bruce Castle-Renovate multi-use games area	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Tower Gardens Landscape Improvements to go pesticide free	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓
Lordship Recreation Ground-Changing Places Accessible	✓	✓	✓	✓		✓		✓	✓			✓	✓	✓

Toilet															
Downhills Park- Tennis Court	✓	✓	✓	✓		✓		✓	✓				✓	✓	✓
Hartingdon Park Play and Sports Upgrade	✓	✓	✓	✓		✓		✓	✓				✓	✓	✓
BMX Track	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
Parkland Walk Play	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
Tree Planting Area 7	✓	✓	✓	✓		✓		✓	✓				✓	✓	✓
Tree Planting HNF	✓	✓	✓	✓		✓		✓	✓				✓	✓	✓
Re-deployable cameras	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
On-street waste containment	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
Bruce Grove Youth Space Improvement Project	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
Wood Green Youth Space Improvement Project	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
Bike Hangars	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
LGBT+ Crossing The Roundway and Lordship Lane	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓
Zebra Crossing at Shelbourne Road	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓	✓

Haringey CIL Governance document criteria A-L

- a. The proposed project has the support of the service provider or operator
- b. The use of CIL funding is necessary as no alternative funding sources are available to deliver the proposed infrastructure, including funding that may be made available in a later funding period (the exception is where there is an urgent need for the infrastructure and the Council can secure the CIL funds to be reimbursed at specified later date)
- c. The proposed infrastructure will promote a sustainable form of development and will not give rise to local impacts
- d. The use of CIL funding can help to optimised the delivery of identified infrastructure through the ability to leverage other sources of funding, such as match or gap funding, or to reduce borrowing costs

- e. The use of CIL funding can provide additionality to a capital infrastructure project that maximises the benefits of the parent project where mainstream funding does not provide for this
- f. The use of CIL funding can increase the capacity of existing strategic infrastructure
- g. The use of CIL funding can help to deliver coordinated improvements within the area
- h. The use of CIL funding can help to accelerate the delivery of regeneration initiatives
- i. The use of CIL funding will help further sustainable economic growth for the benefit of the area or the borough
- j. The proposed infrastructure is of a sufficient scale or scope so as to positively impact the local area
- k. The proposed infrastructure can be delivered within 24 months of authorisation
- l. The use of CIL funding represents value for money and will not give rise to long-term liabilities that place a financial burden on the service provider or operator.

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