

Debi Rogers
CIL Examination Programme Officer
Royal Borough of Greenwich
The Woolwich Centre
35 Wellington Street
Woolwich
London
SE18 6HQ

14 Regent's Wharf
All Saints Street
London N1 9RL
020 7837 4477
london@nipplanning.com
nipplanning.com

Date 26 January 2015

Our ref ~~1107/SEMR/1325937/1~~

Dear Mrs Rogers

Royal Borough of Greenwich Community Infrastructure Levy Draft Charging Schedule Consultation Examination

Comments by Peabody Group

Nathaniel Lichfield and Partners (NLP) is instructed by the Peabody Group ("Peabody") in respect of its interest in the Royal Borough of Greenwich Community Infrastructure Levy (RBG CIL). Peabody submitted a representation to the RBG CIL Draft Charging Schedule Consultation on 10 September 2014 (your reference 'Rep 20'). The Council's response is set out in the November 2014 'Regulation 19(1b) Representation Statement and Summary of Main Issues' document (pgs. 16-17).

The purpose of this letter is to reinforce Peabody's main representations by way of additional comments ahead of the RBG CIL Examination. As with the submission to RBG dated 10th September 2015, the comments in this letter are informed by high level viability work to support bringing forward development within Thamesmead, Abbey Wood and Plumstead by Peabody ahead of individual scheme proposals being development. Additional comments are as follows:

- 1 Peabody looks forward to working with RBG and other stakeholders in bringing forward regeneration proposals for the Thamesmead, Abbey Wood and Plumstead areas, a key objective of both the Mayor's and RBG's planning policies. The viability challenges of development in this area are well established as have been recognised through RBG's recent application for Housing Zone status.
- 2 The viability of development in Thamesmead, and Abbey Wood is marginal and Peabody remain concerned that a single CIL rate of £70 may prejudice development in these areas. This is highlighted by Question 2 of the 'Question for the Examiner' which states:

"In the light of BNPPRE Viability Appraisal finding that most residential development in Thamesmead, Plumstead and Abbey Wood is not viable, is the maximum CIL rate of £95/sq. m. for these areas indicated by the VA supported by the evidence?"

Does the evidence support the need for a lower or zero rate for residential development in Thamesmead, Plumstead and Abbey Wood?"

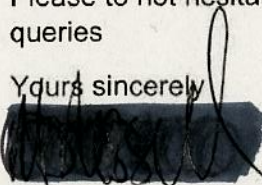


- 3 The large difference in the CIL rates that are proposed in RBG and accepted by the Examiner in the London Borough of Bexley (LBB) in the neighbouring areas of Abbey Wood and Thamesmead, which cover areas of both charging authorities, do not reflect the similarities in the viability of development in the two areas. In this respect, the Examiner's Report on the LBB CIL Examination published on 30 December 2014 is of relevance. The north west part of LBB which borders RBG shares a number of characteristics as the Thamesmead and Abbey Wood areas within RBG. The LBB residential CIL rate for the LBB northern area is £40 which is lower than the southern area of the Borough; the Examiner recognised that different CIL rates were appropriate in LBB. This results in a total residential CIL of £60 when added to the LBB Mayoral CIL rate of £20. This contrasts with £105 in RBG (£35 Mayoral CIL and £70 proposed RBG CIL). Peabody maintains that such an approach as that accepted in Bexley (i.e. a lower CIL rate in less viable areas) would also be appropriate in RBG.
- 4 Peabody supports, in principle, the Council's proposal to introduce both an instalment policy and exceptional circumstances relief policy. However, Peabody would urge that our detailed concerns regarding the payment terms within the draft instalment policy be considered at the Examination. Peabody recognises that the CIL Regulations allow for phased developments that can be treated as separate chargeable developments for CIL purposes.

Peabody do not intend to participate in the RBG CIL Examination, but we trust the above further commentary is helpful and will be taken into account at the Examination.

Please do not hesitate to contact me or Steven Butterworth at this office should you have any queries

Yours sincerely



Michael Russell
Planning Director