

Planning Department, RB Greenwich,
The Woolwich Centre
35 Wellington Street
London
SE18 6HQ

21st September 2023
Reference JF/RE/0230

Dear Sir/Madam

**WRITTEN REPRESENTATIONS TO ROYAL BOROUGH OF GREENWICH'S REVISED
DRAFT CIL CHARGING SCHEDULE**

I write on behalf of my client, Sabreleague Ltd, to make representations to the Royal Borough of Greenwich's ('RBG') revised draft charging schedule, which is currently open for consultation.

Introduction

Sabreleague is a property development company and major landowner in London. Sabreleague have multiple industrial landholdings within the Borough, including in Charlton and Abbey Wood.

The site in Abbey Wood contains the Lydean Industrial Estate. This site is currently going through pre-application discussions with RBG and the GLA to bring forward a high-quality and viable mixed use scheme comprising employment space and 400 – 500 new units.

Representations

The representations are made on the draft charging schedule. The draft charging schedule proposes a considerable increase in CIL from £40/m² to £96/m² for new residential in Zone 2 and £0/m² to £25/m² for all other uses.

As part of the pre-application planning process for Lydean Industrial Estate, one of the major issues for the deliverability of the scheme is the constrained viability. Viability has informed the pre-application scheme and has shown considerable constraints.

Even a scheme of this scale has limited ability to make a policy compliant level of affordable housing, due to various factors including high build costs, high existing use value of the site, high finance costs and relatively low sales values.

It has been expressed that the key priority for the Borough is affordable housing, and particularly social housing. Our client is keen to do all they can to contribute as much as

possible. However, the proposed increase in the CIL rate will erode even further the potential quantum of affordable housing a scheme could deliver.

It is therefore requested that the CIL rate is not increased for new residential development and other uses. By increasing it to this extent the result will be lower or no affordable housing provision on major schemes in Abbey Wood and across the Borough.

To prove the compromised ability of major schemes to deliver a policy compliant level of affordable housing, below are some recent schemes and the maximum amount of affordable housing they could provide:

Planning Reference	Site	No. Units	Affordable provision (by unit)
21/3231/F	Woolwich Central, Phases 3 and 4, land bound by Love Lane, Grand Depot Road, John Wilson Street, Thomas Street, Woolwich New Road, Woolwich	712	23%
22/1017/F	Land bound by Vincent Road, Wilmount Street and Woolwich New Road, Woolwich, SE18	482	30%
20/3444/MA	Morris Walk Estate (South), Pett Street, Woolwich, London, SE18 5PA	462	27%
20/1924/F (Appeal Ref: APP/E5330/W/21/3285177)	Land at Nos. 6, 61-81 and Coopers Yard, Eastmoor Street and Nos. 6 & 10 Westmoor Street, Charlton, London, SE7 8LX	188	30%
20/3385/F & 20/3386/L	Woolwich Exchange, Land Bounded by Plumstead Road, Burrage Road, Spray Street and Woolwich New Road, Woolwich, London, SE18 7BZ	801	20%
19/2498/F	Land bound by Beresford Street and Macbean Street, Woolwich, SE18 6BG	595	20%
16/2878/F	Land at Felixstowe Road, Felixstowe Road, Abbey Wood, SE2 9SG	245	9.8%

It is very clear that the proposed significant increase to the CIL for residential and other uses in Greenwich will further erode the viability of schemes. This will lead to a significant impact on the ability of major schemes to delivery affordable housing, that is a real priority for the Borough. We therefore request the current CIL level is kept without the increase.

I look forward to receiving a response to these representations in due course.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'John Ferguson', is positioned below the closing 'Yours faithfully,'.

John Ferguson BSc (Hons), PG Dip TP, MRTPI

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