

TTL Properties Limited

Date: 27 September 2023
TfL Ref: TTLP/Greenwich CIL - HS

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By email: Planning.policy@royalgreenwich.gov.uk

Dear Sir / Madam,

RE: Royal Borough of Greenwich (RBG) - Proposed changes to the Community Infrastructure Levy (CIL) charges

Thank you for providing the opportunity to TTL Properties Limited (TTLP) to comment on the proposed changes to the Royal Borough's Community Infrastructure Levy charges.

Please note that our representations below are the views of the TTLP planning team given the land interest that TfL has in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TTL Properties Limited (TTLP)

Transport for London (TfL) has set up a dedicated commercial property company, TTL Properties Limited (TTLP) to deliver housing in high demand areas, manage its commercial estate and undertake other development projects.

TfL has significant landholdings in Woolwich and the Greenwich peninsula which may be suitable for future development. The sites which will be brought forward by TTLP are:

- **Woolwich Arsenal DLR:** TfL owns land over and immediately around the Woolwich DLR station (please see map in appendix 1). Part of the site has a draft site allocation (Site W10 DLR Station) in the RBG Site Allocations Proposed Submission (Reg 19) (2021).
- **Land to the north of Woolwich High Street:** TfL own land to the north of Woolwich High Street which is adjacent to the west of the Waterfront Leisure Centre (please see map in appendix 2).

As it was done in Kidbrooke, where construction work is ongoing to deliver 619 new homes, TTLP are exploring the potential to develop the above sites for high-quality mixed-use development that relates to and strengthens each individual neighbourhoods and deliver places that people are proud to live in, and which are founded on transparent engagement and best practice.

TTLP recognise that CIL is crucial to providing the infrastructure that the borough needs but that there is a delicate balance that needs to be achieved which delivers infrastructure without unintentionally constraining development.

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The Council's proposed changes to the CIL charges

TTLP are concerned that the proposed new CIL changes could have adverse implications for the viability of the sites listed above, the development of which could provide much needed housing, including affordable housing and other public benefits. Planning Practice Guidance (Paragraph: 010 Reference ID: 25-010-20190901) stipulates that when deciding the levy rates, an authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments.

TfL Operational and Infrastructure Constraints and Requirements

Most of our sites are located near transport infrastructure, which makes their development particularly complex. In the case of the above-mentioned Woolwich Arsenal DLR site, the redevelopment of the site will be particularly challenging due to the railway tunnels which run under the site and the infrastructure and operational constraints and requirements linked to the DLR operations.

Any schemes coming forward would likely involve over-station development, decking over open sections of the DLR and the integration of multiple pieces of existing infrastructure critical to DLR operations (transformers, substations and intervention points) which would require complex designs and construction logistics with high level of expenses not typically associated with other types of development. There would also be additional costs associated with mitigating sound and vibration from the adjacent railway, as well as operational requirements such as a 3-meter buffer from the railway, which would reduce the developable site area. As a transport operator, TfL would also have to bear the costs of any protective measures associated with the delivery of any development close to the railway tracks to maintain service operations, and the health and safety of the network and passengers.

It can therefore be anticipated that these **significant abnormal costs** will have **viability implications on the potential delivery of this scheme and other TTLP schemes in Greenwich.**

In addition to this, recent regulatory changes relating to the **provision of a second staircase** in buildings of 18m+ will also have viability implications for residential developments in Greenwich. This should **be reflected in the Greenwich Viability Update Study** (March 23) as it could be additional developer cost.

It is therefore important that any changes to the CIL rates are well justified and based on site specific evidence to ensure that development on key strategic sites remains viable and do not impact development activity and thus CIL income.

TfL Development Requirements

As a public sector body, TTLP seek to lead the way in terms of housing delivery, sustainable development, and high-quality design. Working with our development partners, our projects incorporate:

- **High-quality design and place-making** facilitated by our [Design Principles](#) and review by the Mayoral Design Advocates, as well as LPA and GLA officers and Design Review Panels. This approach is supported by the increasing focus in national policy on good design and 'beautiful' places.
- A strong focus on **sustainable development** informed by TfL's Sustainable Development Framework (SDF) which combines ambitious visions and a well-designed strategy, with focused performance metrics and quantitative targets, to achieve optimum sustainability

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solutions for our developments. The Framework sets out a clear mechanism for the definition and optimisation of goals, evaluating project performance and actively seeking opportunities for the improvement of performance with subsequent implementation. The framework spans nine dimensions of sustainability across the triple bottom line (this being environmental, social and economic). Each dimension contains a set of Key Performance Indicators (KPI), and each KPI has corresponding minimum and aspirational performance levels. This is a continuously evolving methodology in line with policy, best practices and lessons learned. This framework demonstrates TfL's aspirations to deliver development which capitalises on opportunities for environmental, social and economic sustainability to a greater degree than other developers may. This can have some cost implications but ultimately will help deliver more cohesive and successful communities and places, and whilst this is relevant to all new development it is particularly key with this larger scale schemes that TTLP is looking to bring forward in the borough.

- A commitment, as a public sector landowner, to deliver at least **50% affordable housing** across our portfolio of sites as agreed with the Mayor of London (London Plan Policy H4).
- Our schemes are usually at, or adjacent to, transport infrastructure and so we need to take the opportunity to improve e.g. public transport access and interchange; walking and cycle routes and other facilities to promote active, healthy travel; and measures to reduce reliance on private vehicles.

These aspirations for well-designed, sustainable development can have implications for scheme viability. However, the benefits that this can bring are significant and all of these elements play a strong role in supporting sustainable, healthy and well-connected communities. It would be unfortunate if the increased CIL charges jeopardised high-quality development on public land which has the potential to provide such a high degree of local social, environmental and economic benefits.

Land or Infrastructure in lieu of CIL

In order to maintain the viability of schemes which deliver significant infrastructure benefits, we suggest that the Council considers and accepts, in appropriate circumstances land or infrastructure in lieu of a CIL contribution. This is appropriate where a development goes above and beyond what it needs to do to make the development acceptable in planning terms and is instead providing strategic infrastructure. This is set out in [Section 73 of the CIL Regs.](#)

Exceptional Circumstances Relief (ECR)

The Royal Borough of Greenwich took the decision to withdraw exceptional circumstances relief. TTLP would like to ask the Council to re-instate this ECR policy to support schemes which deliver significant infrastructure benefits.

CIL to pay for strategic infrastructure

As mentioned at the beginning of this letter, whilst TTLP ask the Council to be cautious about the changes of the new CIL rates, TTLP recognise the value of CIL in **delivering vital infrastructure** across London. TTLP therefore welcome the references to the DLR extension to Thamesmead, the bus rapid transit and the priority projects identified in Woolwich in RBG's updated Infrastructure Delivery Plan (IDP).

Concluding Remarks

TTLP has delivered Kidbrooke and intends to deliver hundreds of new homes across the Royal Borough of Greenwich. TTLP would welcome any further engagement with you should you wish to discuss any aspect of this response.

TTL Properties Limited

We would be grateful if we could be notified when you submit your charging schedule for examination, the publication of the recommendations of the examiner and approval of the charging schedule.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'H Sanson', with a long horizontal line extending to the right.

Hermine Sanson
Principal Planning Manager, TTLP

cc. Brendan Hodges, TTLP
Luke Burrroughs, TTLP
Kelly Lopez, TTLP
Richard Carr, TfL Spatial planning