Royal Borough of Greenwich Community Infrastructure Levy (CIL)

Statement of Representations Made

March 2024

1. The public consultation

1.1. As agreed by Cabinet on 4th May 2023, the Royal Borough of Greenwich launched the consultation of the CIL (Community Infrastructure Levy) Revised Draft Charging Schedule (RDCS), which has been the subject of a comprehensive public consultation in August and September 2023 comprising:

- The RDCS
- Viability Assessment
- Infrastructure Delivery Plan and Appendix A
- Infrastructure Funding Gap Report (IFGR)
- Statement of Representations Procedure

1.2. These documents were published on the Council's Commonplace platform – the council's platform for public consultations – from 31st July to 25th September 2023, in accordance with Regulation 17(3). Copies of the RDCS, the supporting evidence, and the Statement of Representations Procedure were made available at The Woolwich Centre, Etham Centre Library, Greenwich Centre Library, and Thamesmere Library. An advertisement of the consultation was published on the council's website, linking to the council's Commonplace platform and a notification was sent to those registered on the council's planning policy database. This includes people and organisations who have previously expressed an interest in council's planning consultations through the platform, including residents, developers and organisations.

1.3. The public were invited to provide feedback and submit representations from 31st July to 25th September 2023, through the following channels:

- Through the Council's Commonplace platform, via an online questionnaire.
- Filling in a questionnaire at Eltham Centre, Greenwich Centre, Thamesmere and Woolwich Centre libraries.
- Via email to the planning team: planning.policy@royalgreenwich.gov.uk
- Or via written letter to:

  Planning Policy

  Directorate of Regeneration, Enterprise and Skills

  Royal Borough of Greenwich

  The Woolwich Centre, 35 Wellington Street, London SE18 6HQ

2. The outcome from the public consultation

2.1. Ten representations were received through the email address planning.policy@royalgreenwich.gov.uk. Nine of these consisted of letters from, or on behalf of, the following organisations:

- CBRE, on behalf of Greater London Industrial Ltd
- Quod, on behalf of Berkey Homes East Thames Ltd
- Quod, on behalf of Knight Dragon Ltd
- Quod, on behalf of Thames Waterfront Joint Venture (Peabody and Lendlease)
- Environment Agency
- Natural England
- Network Rail
- Transport for London, Planning and Obligations Team
- TTL Properties Ltd (Transport for London)

A response was also received from one individual, RB Greenwich resident.

An additional letter, submitted by Collective Planning, on behalf of Sabreleague Ltd, was received as attachment through the Commonplace platform.

2.2. A number of the representations above clearly support the RB Greenwich Community Infrastructure Levy, including both from residents and from organisations such as Environment Agency, Natural England, Transport for London, and Network Rail.

2.3. Six of these representations were identified as containing substantive comments which require a technical response from the Council. Some of the key issues raised include:

- The proposed increases in CIL rates are not considered to be appropriately evidenced and sound.
- The proposed increases in CIL rates are considered to entail an additional burden on development at a time when development is challenging due to the current interest rate, regulatory and inflation environments.
- The proposed increases in CIL rates are considered to affect the viability of key developments in the borough.
- The Viability Report is not considered to make appropriate assumptions about large scale, strategic, multi-phased development with significant infrastructure costs.
- The Council should consider site-specific assessment and rates for strategic sites, including setting zero-rates for such sites with infrastructure and other obligations secured through a delivery agreement.
- The Council should delay the revision of the Charging Schedule until further details on infrastructure requirements and site allocations are available with the development of the new Local Plan.

2.4. The full representations above and the proposed Council response are included in Table 1 on page 5 of this document.

2.5. Additionally, 144 responses were received through the Council's website (via Commonplace platform), plus 5 duplicated responses. From these responses:

- 65 said they agree with the proposed CIL changes
- 68 said they disagree with the proposed CIL changes
- 15 responded they would like to speak at the public examination
- 11 responded they disagree with the proposed changes AND would like to speat at the public examination. From these responses
    - 3 responded "I live here" to the question "What is your connection to the Royal Borough of Greenwich?"
    - 1 responded "I live here, I do my shopping here"
    - 1 responded "I live here, I work here"
    - 1 responded "I work here"
    - 3 responded on behalf of an organisation: Collective Planning, London Square Developments Ltd, and Greenwich and Bexley Green Party.
- Other responses made on behalf of organisations include: Middle Park Community Centre (agreed with changes), Pressure Coolers Ltd (disagreed), Riefield Road Residents Association (agreed), and L&Q (disagreed).

2.6. The key issues raised through representations received via Commonplace are summarised below:

- 35 of the responses consider that the proposed CIL charges should be higher and/or are too low compared to other boroughs. A number of responses suggest higher rates are needed to fund more social infrastructure and provide maintenance to existing public infrastructure.
- More specifically, some responses suggest charges should be higher for particular use classes, mainly student accommodation and hotels; in certain areas, such as land on the riverside and the peninsula; or for specific type of developments such as high-density housing.
- Other comments include:
  - The proposed CIL increases would have a negative impact on scheme viability and housing delivery.
  - The proposed changes are not consistent across use classes.
  - Concerns that the funding received through the adopted CIL rates will be directed to Crossrail above other important infrastructure.
  - The proposed changes should have been made sooner, in line with other boroughs.
  - Concerns that the proposed increases will translate into higher costs for new houses and flats in the areas as developers pass the costs on to the sale/rental price.
  - Lack of transparency of what happens to the monies when received.
  - The proposed changes would make provision of new housing less attractive while other uses, such as student accommodation, would be treated more favourably.
  - Concerns that the CIL increased rates would mean that house/flat owners will need to pay more for social infrastructure.
  - Concerns that CIL charges would mean that residents will need to pay additional taxes.
  - Concerns that CIL charges would entail an additional burden on builders and developers and should be eliminated altogether.

2.7. A summary of key issues raised in representations received through Commonplace and the proposed Council response are included in Table 2 in page 81. The full list of representations received through Commonplace and the proposed Council response are included in Table 3 in page 86.

Table 1. Representations received via letters and proposed Council response.

Representor	Key points of representation	Royal Borough of Greenwich response
Transport for London (TfL)	Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. A separate response has been prepared by TfL Commercial Development (TfL Property) to reflect TfL's interests as a landowner and potential developer.	Noted.
	Thank you for giving Transport for London (TfL) Spatial Planning the opportunity to comment on the Royal Borough of Greenwich Community Infrastructure Levy (CIL) Draft Charging Schedule.	Noted.
	TfL is generally supportive of the review to CIL charges in Greenwich. We recognise the value of CIL in delivering vital infrastructure across London and reviewing a CIL charging schedule can help increase the relevance and value of CIL, enabling further infrastructure provision. However, it is important that these changes are well justified, and do not adversely	Noted. RBG's updated CIL rates have been informed by viability evidence, and set in line with the requirements of CIL Regulation 14. That is, RBG has struck an appropriate balance between: • the desirability to fund the actual and expected estimated total cost of infrastructure required to support the development of the Royal Borough, taking into account other actual and expected sources of funding; and

Representor	Key points of representation	Royal Borough of Greenwich response
	affect development viability, which could in turn impact development activity and thus CIL income.	• the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across Royal Borough.
	We are pleased to see that the viability appraisal considers the existing Mayoral CIL (MCIL) charge, and that this includes the MCIL2 rate of £25 per square metre applicable to CIL liable development in Royal Borough Greenwich, and which took effect on 1 April 2019. MCIL is vital in delivering strategic transport infrastructure in London, with MCIL receipts helping to repay Crossrail (Elizabeth line) financing.	Noted.
	We welcome reference to the DLR extension to Thamesmead and bus transit in your updated Infrastructure Delivery Plan (IDP). We have been working collaboratively with Greenwich officers on both these projects. Initial funding studies have indicated that maximising local funding contributions will be essential to deliver these projects, including Borough CIL. This has been discussed at length with Royal Borough Greenwich finance officers as well as the transport team and should be listed among the Priority spending projects 2020-2025/2030.	The Council notes Transport for London's comments and agrees that local funding contributions, such as CIL, are essential to deliver transport infrastructure projects such as the DLR extension and rapid bus transit (which is included in the Priority Spending Projects in the IDP). The Council is keen to continue close engagement with TfL to identify priority projects in the borough including future updates to the IDP, including the DLR extension.
Environment Agency	Thank you for consulting the Environment Agency on the Greenwich Community Infrastructure Levy (CiL) proposals. With ongoing high levels of growth across Greenwich we are keen to work with you to ensure development and regeneration delivers environmental	Noted.

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	protection and enhancement and identify environmental infrastructure cost estimates and funding options. We are keen to work with you to ensure the right environmental infrastructure is in place and maintained to support and enable high levels of growth ongoing. This includes essential infrastructure such as tidal flood defences, waste management infrastructure, water supply and waste water treatment and disposal and habitat improvements. We would like to organise a meeting to discuss infrastructure funding and the ongoing Local Plan review and developing a Riverside Strategy for the Thames tidal flood defences and riverside areas and will be in touch to organise this.	The Council notes the response is also keen to collaborate with the Environment Agency to ensure the essential infrastructure referred to is in place and appropriately maintained. The Council will liaise with the Environment Agency to schedule the proposed meeting and welcomes the Environment Agency’s participation in the development of the new Local Plan.
Natural England	Thank you for your consultation request on the above dated and received by Natural England on 18th September 2023. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	Noted. Noted

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	Natural England is a statutory consultee in Local and Neighbourhood planning and must be consulted on draft Local and Neighbourhood development plans and associated documents by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any comments on the proposed changes for the Royal Greenwich Infrastructure Funding.	Noted. Noted.
Network Rail (Southern)	Thank you for providing Network Rail (Southern) with the opportunity to make comment on the CIL charging schedule. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda. In addition, Network Rail is a statutory undertaker responsible for maintaining, operating and developing the main railway network and its associated estate. Our aim is to protect and enhance the railway infrastructure. Network Rail is supportive of the CIL charging schedule as consulted upon by the Council. A significant amount of funding for enhancements to the rail network comes from sources such as CIL and therefore, the more funding that is captured via this mechanism potentially means the greater the opportunity for this to be spent on the rail network. This timing alongside the work being done on the Local Plan would allow opportunity to	Noted. Noted. The Council welcomes Network Rail's comments and the Council is keen to collaborate with Network Rail for the development of the new Local Plan as suggested.

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	discuss and identify infrastructure improvements that could be funded via CIL. Network Rail would be keen to assist the Council in identifying suitable projects that current and future CIL monies could be spent on and, as a statutory body, would welcome involvement in any high-level spending or advisory boards that the Council may operate in setting the direction for the spending of CIL. Network Rail have recently been invited to join Dartford BC's Leader's Advisory Group on CIL. This is based on Network Rail having a strategic view of the Local Authority area to ensure the money is being raised to fund the right infrastructure. Network Rail are keen to work with RB Greenwich going forward in supporting to identify infrastructure needs and funding opportunities to improve the rail network within the Borough, for the benefits of the local economy and residents.	The Council welcomes Network Rail's assistance in identifying suitable projects that CIL monies could help fund, and notes the offer to be involved in any governance regarding the spending strategy for CIL, either as part of the Local Plan process or separately. The Council will engage with Network Rail on this in due course. The Council is also keen to collaborate with Network Rail to identify infrastructure needs within the borough and how rail network improvements should be funded.
CBRE, on behalf of Greater London Industrial	**Introduction** Procedural Matters Instruction Purpose 1. CBRE UK Ltd ('CBRE') has been instructed by Patrizia & Kingston Space Property (KSP) Ltd JV partnership, known as the 'GLi Platform'	RBG notes that both the VIP Trading Estate and the Stone Foundries are located within current CIL Zone 1 for which a CIL charge of £70 per sq m unindexed and £102.97 indexed to 2024 CIL rates (as published in RBG's Annual CIL Rate Summary 2024) applies. RBG's Revised DCS places the sites within the new Zone 2, for which a charge of £96 per sq m is proposed. This rate was in line with the 2023 indexed Zone 1 CIL rate, however based on the 2024 indexed CIL rate for Zone 1 there has

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	(hereafter 'GLi') to prepare a formal representation document setting out a technical response to the Royal Borough of Greenwich ('RBG') Community Infrastructure Levy ('CIL') Draft Charging Schedule ('DCS') consultation 2023 ('the consultation'). GLi have specific interest in their land ownerships at Charlton Riverside which include the VIP Trading Estate, Anchor and Hope Lane, Charlton, London, SE7 7TE (hereafter 'VIP Trading Estate', and Stone Foundries, 669a Woolwich Road, Charlton, London SE7 8SL (hereafter 'Stone Foundries'). The Consultation 2. RBG published the following documents in connection with the DCS: • CIL Statement of Representations Procedure ('SORP') • CIL Viability Assessment ('CIL VA') prepared by BNP Paribas, dated March 2023 • CIL Draft Charging Schedule ('CIL DCS') 3. RBG is consulting on the CIL DICS from 31st July to 25th September, as per the SOPR. 4. The SORP confirms RBG's intention to submit the CIL DCS for independent examination following the close of the CIL DCS consultation. GLi's Stance 5. GLi has fundamental concerns regarding the timing of this consultation on a new CIL DCS, the validity and reliability of the published viability	effectively been a small decrease in the CIL liability on the site and not an increase. RBG appreciates that there has been uncertainty in the market over recent months, however market reports are looking more optimistic. In their January 2024 Housing Market update report, Savills identify that, *"…The relative resilience of house prices has been supported by falling mortgage rates. Lenders have been cutting rates to compete in a low activity market and doing so in anticipation of an earlier reduction in the Bank of England base rate.* *The first base rate cut is now expected in May* [2024]*, according to Oxford Economics, much sooner than previously forecast…"* Notwithstanding the above, RBG would highlight that their current CIL charging schedule, which was adopted in March 2015 and introduced in April 2015, was based on market data from between 2012 and 2014 i.e. ten years ago. The market and development and regeneration in RBG has changed and progressed significantly since then and as a consequence, the RBG has sought to review its CIL rates and boundaries based on the current position and market evidence available. The Halifax reported in their December 2023 House Price Index Report that *"Average house prices rose by +1.1% in December, the third monthly rise in a row"* and that *"The housing market beat expectations in 2023 and grew by +1.7% on an annual basis"*.

Representor	Key points of representation	Royal Borough of Greenwich response
	evidence base upon which the proposed new charging rates (and zones) within the CIL DCS is reliant, and hence the legal compliance of the published CIL DCS with the relevant legislation and guidance. 6. On this basis, the consortium members cannot agree with RBG that there is an appropriately evidenced and legally compliant basis upon which the CIL DCS (as published) could be found sound by an independent Examiner, which should unavoidable lead to the rejection of the Charging Schedule in accordance with Section 212A(2) of the 2008 Act. 7. Should RBG determine to submit the CIL DCS for examination, in its current form and without rectifying the issues identified in this representation, GLi will be left with no choice but to seek that the Examiner rejects the Charging Schedule via the examination process. Requests 8. It is stated on SORP website that representations must clearly state a request to be heard at the examination of the CIL DCS. It also states that representations must clearly state a request for notification of the submission of the CIL DCS for examination, receipt of the Examiner's Report, and RBG's approval of the Charging Schedule. 9. This constitutes GLi's formal request to be hear at the examination of the CIL DCS, as an independent stakeholder organisation, and to be	The Land Registry House Price Index ('LR HPI') reports on houses nationally as well as more locally. BNPPRE have reviewed house price evidence from the LR HPI data specifically from the Royal Borough. The LR HPI data identifies that in the RBG new build house prices have increased by 49% since March 2015 i.e. the point at which the current charging schedule was adopted. We also note that the LR HPI data reflects new build house prices in RBG as having increased by 13% between March 2022 and September 2023 (the most recent month for which data on house prices are reported currently). The LR HPI data also reports an increase of 3% in the average price of existing properties in the Borough between March 2022 and September 2023. Understandably the key data to be considered for the CIL viability evidence is that of new build homes given that the CIL charge relates to new development. The future trajectory of house prices is currently uncertain, although forecasts from the main property agents indicate that values are expected to increase over the next five years. Medium term predictions are that properties in Mainstream London markets are forecast to grow over the period between 2025 and 2028. Prices will stay static or soften a little in 2024 and then increase in the subsequent years to increase cumulatively by 13.9% to 20.2%.

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<tr><th>Representor</th><th>Key points of representation</th><th>Royal Borough of Greenwich response</th></tr>
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notified of the events listed in paragraph 8 above. This notification should be provided to CBRE, as instructed agent.

Matters of Representation

Purpose

10. This section of the document sets out the matters of representation that GLi determine must be raised with RBG and ultimately, if left unresolved by RBG following the consultation, are for the consideration of the appointed Examiner.

Significance of Proposed CIL DCS Rates

11. The CIL DCS proposes a significant and fundamental set of changes to the charging regime under the adopted Royal Borough of Greenwich CIL Charging Schedule (‘CS’).
12. This is not solely a case of revising existing rates, but actually introducing proposed CIL charging on multiple uses for the first time, and in locations within the borough where uses have not been charged CIL on viability grounds under the adopted CS.
13. Notably, the CIL DCS introduces the following new zonal charges:
• Co-living: a proposed charge for co-living at £90/m^{2}, where no charge is included under the adopted CIL CS.
• All other development: a proposed charge for all other development of £25/m^{2}, would
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<table>
<tr><th>Agent</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th><th>Cumulative growth 2023 – 2026/7</th></tr>
<tr><td>Savills – Mainstream Central London Q4 2023</td><td>-4.0%</td><td>+2.0%</td><td>+4.0%</td><td>+6.0%</td><td>+5.5%</td><td>+13.9%</td></tr>
<tr><td>JLL – Greater London Q4 2023</td><td>-2.0%</td><td>+3.5%</td><td>+4.5%</td><td>+4.5%</td><td>+5.0%</td><td>+16.3%</td></tr>
<tr><td>CBRE – London Q4 2023</td><td>-1.0%</td><td>+5.1%</td><td>+6.1%</td><td>+4.9%</td><td>+3.8%</td><td>+20.2%</td></tr>
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RBG recognise that CBRE’s simple analysis of the percentage increase in the CIL charges (56.33% in Zone 1 and 75.09% in Zone 2) is methodologically correct. However, this approach to measuring the rate increase can be misleading and unhelpful as the increase is expressed by reference to the starting point charge, and provides no information as to the likely impact on the development of such a charge.

To provide a simple example, if a rate of say £10 per sq m were to be increased by 50% this would take the charge up to £15 per sq m. An increase of 50% appears to be significant, however this in fact only represents a £5 per sq m increase. More particularly however, the percentage uplift does not identify the impact on development viability of such a charge.

To this end BNPPRE have identified that the proposed rate increases in the borough in Zone 1 from £102.97 per sq m to £150 per sq m accounts
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Representor	Key points of representation	Royal Borough of Greenwich response
	replace a £0/m^2 charge covering 'all other development' under the adopted CIL CS. 14. The CIL DCS also increases the proposed CIL rates substantially beyond the existing (indexed) 2023 CIL rates for the following uses: • Residential (Zone 1): the Zone 1 charging zone has a proposed rate increase of £150/m^2, which is a 56% uplift over the indexed charge under the adopted CIL CS. • Residential (Zone 2): the Zone 2 charging zone has a proposed rate increase to £96/m^2, which is a 75% uplift over the indexed charge under the adopted CIL CS. 15. CBRE notes that the area boundaries for Zone 1 and Zone 2 of the CIL CS, in comparison to the CIL DCS, have changed significantly. a. Zone 1 of the CS covers the majority of the borough, with the exception of the area to the north-east of borough including Plumstead, Abbey Wood and Thamesmead which falls under Zone 2. b. Zone 2 of the CIL DCS covers the north-west of the borough (Greenwich Park, up to the 02 Centre) and the immediate area surrounding Woolwich Arsenal. The rest of the borough is designated as Zone 2. 16. A summary analysis of the charging rates proposed by RBG in the CIL DCS (where above £0/m^2), in comparison to the charging rates payable under the adopted CS (indexed for 2023), is set out in Table 1.	for a small percentage of development costs, identified as being on average an increase of circa 0.83%. The increase in the proposed CIL rate in Zone 2 from £58.84 per sq m to £96 per sq m reflects an increase in costs to a development of 0.9%. At £150 per sq m, the proposed revised CIL Zone 1 charge would account for a total of 2.5% of development costs. BNPPRE have identified that 1.67% of these CIL costs are already embedded in the market through the currently adopted CIL charge. The proposed revised CIL Zone 2 charge would account for a total charge of 2.1% and in this regard 1.2% of these costs are already embedded in the market. RBG as the Charging Authority considers that this analysis demonstrates that the proposed revised CIL rates are set at reasonable levels and that these increases in the CIL rates are very unlikely to be the determining factor as to whether or not a developer brings forward a site for development. Moreover, the funding secured through the CIL will support the growth being delivered in the RBG through the provision of much needed infrastructure. To this end RBG considers that it has set its revised CIL rates in line with the requirements of the CIL Regulations 2010 (as amended). Regulation 14 requires a charging authority to strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. The introduction of a CIL charge for Co-living uses is not captured by the indexation of existing CIL charges. RBG would be remiss in not taking the opportunity to review their CIL charging schedule, which was

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Table 1: Charging Rate Comparison | CIL CS (Indexed) and CIL DCS
<table>
<tr><th>Use</th><th>Detail</th><th>Rate (£/m² GIA)
2023 (Adopted CS & Indexed)</th><th>CIL DCS (Proposed)</th><th>Increase (£/m²)</th><th>Increase (%)</th></tr>
<tr><td>Residential</td><td>Zone 1</td><td>£95.95</td><td>£150.00</td><td>£54.05</td><td>56.33%</td></tr>
<tr><td>Residential</td><td>Zone 2</td><td>£54.83</td><td>£96.00</td><td>£41.17</td><td>75.09%</td></tr>
<tr><td>Co-living</td><td>All areas</td><td>£0</td><td>£90.00</td><td>£90.00</td><td>N/A</td></tr>
<tr><td>Student accommodation</td><td>All areas</td><td>£89.09</td><td>£89.09</td><td>£0</td><td>0%</td></tr>
<tr><td>Supermarkets/superstores and retail warehousing (280m² +)</td><td>All areas</td><td>£137.07</td><td>£137.07</td><td>£0</td><td>0%</td></tr>
<tr><td>Hotel</td><td>All areas</td><td>£137.07</td><td>£137.07</td><td>£0</td><td>0%</td></tr>
<tr><td>All other development</td><td>All areas</td><td>£0.00</td><td>£25.00</td><td>£25.00</td><td>N/A</td></tr>
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17. These are not incremental changes, but rather represent fundamental proposals to increase the rates of CIL charging substantially beyond the evidenced rate of indexation across multiple uses both borough wide and on a zonal basis. Particularly, the newly introduced Co-living rate at £90/m² and the All Other Development rate at £25.00/m² are significant and have the potential to significantly impact/stifle development comprising these uses.
18. As a result, such proposed changes must necessitate comprehensive, robust, and up-do-date available evidence of financial viability in order to provide appropriate justification that they will strike an appropriate balance in accordance with Regulation 14(1) of the CIL Regulations (as amended).
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produced and adopted 9-10 years ago, to consider their existing rates alongside adopting rates on new uses coming forward in the Borough.

BNPPRE have identified that the proposed CIL rate for co-living uses reflects 1.8% of development costs. At this level of cost this will not prevent such developments from coming forward and moreover will ensure that such development fairly contributes towards the delivery of necessary infrastructure to support these uses along with the growth in the Royal Borough. This level of charge is in line with the residential CIL Zone 2 charge and the existing student accommodation charge. Given the evidenced viability and the characteristics of co-living schemes, RBG and BNPPRE consider this to be a balanced and reasonable starting point for CIL contributions to be sought from such developments.

With respect to the “all other uses” rate, at £25 per sq m this is based on the concept that all development in the Borough requires infrastructure to support it, and hence RBG will seek contributions towards CIL from all development (subject to the limited exclusions, which are effectively infrastructure in their own right) in order to support the provision of this vital infrastructure to support the growth in the Borough. This approach is in line with that of the Mayor’s CIL charging schedule. At £25 per sq m, the CIL charge will account for less than 1% of development costs and as a consequence, this will not impact on a developer’s decision to bring forward a development or prevent development from coming forward. Moreover, RBG notes that this strategic approach to securing contributions towards infrastructure has been adopted and implemented by numerous other London boroughs in their CIL charging schedules, and this has not prevented development from coming forward in their areas.
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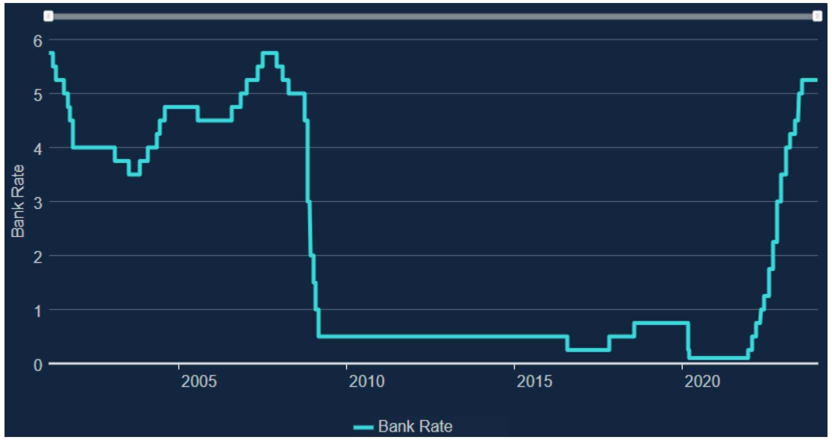
	Illogical Timing 19. The UK property market is experiencing a highly challenging period, which is driven by substantial economic and geo-political uncertainty nationally and globally over 2023, and a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Development and investment across a range of sectors (residential, hotels, offices and industrial and logistics) are facing headwinds for the remainder of 2023 and into 2024. 20. Specifically: a. Economic output and outlook has deteriorated as the inflationary squeeze on real incomes weighed on consumer confidence and spending that hit growth momentum: 02 2023 GDP growth was modest 0.2%. b. Inflation has remained close to an all-time high throughout 2023, despite a marginal decrease in August 2023 at 6.7%, a slight fall from the year to July 2023 at 6.8%. This is much higher than anticipated, although largely attributable to the unforeseen Russian invasion of Ukraine. CPI has fallen in August 2023 to 6.3%, however this is still significant inflation on top of an inflation rise of 8.6% rise in the 12 months to August 2022. Increased global supply chain disruption has and will continue to put	BNPPRE have reviewed yields on BtR schemes and acknowledge that yields have softened since the study was undertaken in March 2023. The Knight Frank residential yield schedule published in December 2023 indicates yields for Zone 2 and Zones 3-6 to be at 4% and 4.15% respectively. BNPPRE have accordingly re-run the BtR appraisals with the higher yields and we have attached copy of the outputs of this updated testing at Appendix A. The results of BNPPRE's updated appraisals of residential development delivered as BtR identifies that these schemes can still support a CIL charge along with delivering affordable housing on site. BNPPRE note that not all schemes will be viable at any given level of affordable housing, particularly in complex urban areas such as Royal Greenwich. Where a scheme is unviable the imposition of CIL at a zero level will not make the scheme viable. BNPPRE therefore recommend that limited regard is had to these schemes as they are unlikely to come forward unless there are significant changes to main appraisal inputs. BNPPRE recommends that RBG retains their proposed CIL rates for BtR developments in line with the rates for market sale residential developments at £150 per sq m in Zone 1 and £96 per sq m for Zone 2. A CIL charge of £150 per sq m reflects circa 3.3% of development costs, whilst a charge of £96 per sq m reflects circa 3% of development costs. The Co-living unit sizes are gross scheme unit sizes and not the net size of the rooms i.e. at 40 sq m they allow for the communal spaces in the scheme. BNPPRE has confirmed that the capital values adopted in the testing are based on a per unit calculation and not per square metre

Representor	Key points of representation	Royal Borough of Greenwich response
	further upward pressure on energy prices, food prices and construction materials. c. A robust labour market continues, albeit the unemployment rate is rising, up to 4.3% as of September 2023 with 102,000 redundancies recorded as at the same point in September 2022 - an increase of 39,000 on the previous year. The tight labour market is creating some upward pressure on wages, which is further fueling inflation. d. Monetary tightening is underway over fears of second-round effects from wage and price-setting. The Bank Rate has been multiple times over the course of 2022/2023. The Bank Rate as at January 2023 was 0.25%. As of September 2023, the Bank Rate is now at 5.25%, pushing borrowing costs to the highest levels prior to the financial crisis in 04 2008. 21. Looking forward to the remainder of 2023 and 2024: a. CBRE expects flattening in in UK economic activity and move sideways some time over the next 12 months, with modest outputs in GDV in 2024 (0.8%) and (1.7%). This is a result of high inflation and rising interest rates, squeezed consumer incomes and reduced aggregate demand. b. Significant uncertainty persists around the future path of inflation. CBRE note that inflation is falling slower than anticipated,	basis. The capital values are therefore correctly ascribed in the viability appraisals of co-living schemes. In BNPPRE's experience of undertaking assessments of Co-living schemes the 30% Operating Expense ('OpEx') cost allowance is within the range considered to be reasonable. As CBRE have indicated, these costs are more appropriately assessed in schemes coming forward based on the known OpEx costs that will be expended in a scheme by the operator, and these can differ based on the facilities and services offered in a scheme as well as the economies of scale achieved in a scheme. BNPPRE have noted that in the appraisals the per unit allowance for OpEx costs based on a 30% allowance are of the order asserted by CBRE but based on this high-level assessment do understandably change dependant on the rental level tested. The Viability study adopts BCIS build costs data in the testing, which is advocated as an appropriate source of data by the PPG on Viability, over and above which BNPPRE have allowed for a generous external works cost of 15% as well as allowing for the additional policy extra over costs and a contingency allowance. The development finance rate adopted of 6.5% is considered to be within a reasonable range for an area wide assessment which will be in place over a long period of time. Development finance in the appraisals is applied as an all-in rate at 100% debt finance. In actuality, development finance is much more complex and differs from development to development and developer to developer.

Representor	Key points of representation	Royal Borough of Greenwich response
	driven primarily by services and wage inflation but is expected to reach the Bank's target of 2% by mid-2025. c. CBRE forecasted that the Bank of England interest rate rises will to combat inflationary pressure. The CBRE base case is that the Bank Rate will peak at 5.75% in 04 2024. The recent decision by the Bank of England not to raise interest rates following in the MCP in September 2023 (remaining at 5.25%) may represent the peak. Long-term interest rates will likely fall, decreasing to 3% by late 2025. 22. Considering specific sectors, CBRE's baseline forecast is as follows: a. Residential: i. Since the start of 2023, the rise in the base rate and subsequent increase in mortgage rates have resulted in falling activity. Mortgage approvals for house purchases were 20% lower in July 2023 ii. Mortgage rates are high by historic standards, and falling demand has generally been offset by even lower supply during the course of 2023. iii. The most recent residential survey from the RICS (August 2023) confirms a downbeat market backdrop, as buyer demand and agreed sales continue to fall sharply in the face of higher mortgage rates. House prices remain	Although a bank would not provide 100% debt finance it is conventional to assume finance on all costs in an appraisal to reflect the opportunity cost of committing equity to the project. Credit rates currently available in the market have not kept pace with debit rates, therefore the finance rate applied in the appraisal should be a blend reflecting debit rates as well as the rates associated with the opportunity cost of committing equity to the project. It is noted that the finance rates adopted in development appraisals did not drop significantly between the property boom era up to circa 2007 and the Global Financial Crisis in 2008-2009, at which point base rates and SONIA were lowered to historic levels and kept there. In 2008, the Bank of England base rate was 5%, and the SONIA rate was 5.535% on 2 January 2008 and ended the year at 1.5375% on 31 December 2008 whilst development finance rates were in the range of 6% to 6.5%. The base rate is currently 5.25% and has been held at this figure since August 2023, see Figure 1 below and the SONIA rate is 5.1884% see Figure 2 below. The Bank of England's November Monetary Policy Report identified *"a market-implied path for Bank Rate that remains around 5¼% until 2024 Q3 and then declines gradually to 4¼% by the end of 2026, a lower profile than underpinned the August projections".* Given that that Base Rate is not expected to increase above this figure, development finance rates are expected to remain within the current range. Furthermore, there is no direct link between development finance rates and the base rate, unlike many mortgages which are directly linked. Prior to the period of ultra-low rates between 2009-2022, the bank of England base rate and SONIA rate stood at circa 5%, whilst development finance rates were 6%.

Representor	Key points of representation	Royal Borough of Greenwich response
	on a downward trajectory, with latest survey feedback pointing to an acceleration in the pace of decline through August. iv. In the lettings market, tenant demand continues to rise firmly. Contributors foresee rental prices being driven higher over the coming three months. b. Offices: i. The UK economic outlook has deteriorated since the start of the year and as a result sentiment in the office market has weakened. ii. The proportion of deals transacting above market prime is increasing, while secondary offices are slower to transact. iii. Yields have moved out and total investment volumes have been constrained in the year-to- date, despite the transaction of some larger lot-sizes. iv. The weakening of sentiment is likely to persuade some occupiers pause their occupational decision-making, resulting in a slow-down in take-up. v. Greater investment volume into 04 2023, but they year is likely to remain subdued relative to 2022 expectations due to the cost of borrowing. c. Industrial & Logistics:	Due to lack of movement in development finance rates, the margins increased; however after a significant number of consecutive base rate increases and increases in SONIA rates, it is unreasonable to simply assume that margins would remain at the same levels when historically this has not been the case. **Figure 1 Bank Base Rate**  Source: Bank of England website: https://www.bankofengland.co.uk/monetary-policy/the-interest-rate-bank-rate **Figure 2 SONIA Rate**

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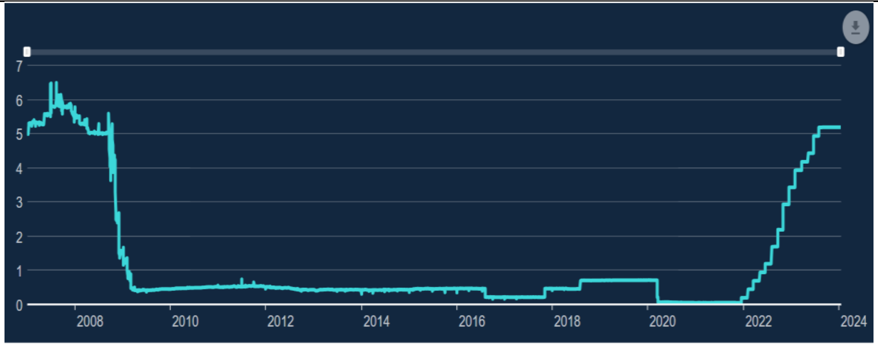
	i. Take-up in 01 2023 was down 18% year-on-year, as occupiers became more cautious and decision making slowed down. The vacancy rate increased to 2.71% in 01, up from 2.00% in 04 2022, driven by an increase in secondhand availability and speculative completions. ii. Investment yields have softened and move out from 02 2022, driven by pressures of higher debt borrowing costs (linked to interest rate rises). The investment market is expected to face further pressure into H1 2024 from macro-economic headwinds, uncertainty and the increasing cost of raising debt for acquisitions. iii. There is still substantial capital targeting the sector with smaller lot sizes particularly in demand. 23. In light of the above, RBG's proposals to increase the cost burden on development at this point will exacerbate uncertainty and slow or stall development and regeneration plans on major sites across the borough that are identified for growth within the Charlton Riverside Opportunity Area and Strategic Development Location. 24. Moreover, both PPG and the RICS Guidance advocate introducing CIL reviews alongside Local Plan reviews (or new Plans) to ensure consistency. RBG is currently undertaking	 https://www.bankofengland.co.uk/boeapps/database/fromshowcolumns.asp?Travel=NIxSUx&FromSeries=1&ToSeries=50&DAT=RNG&FD=1&FM=Jan&FY=2007&TD=22&TM=Jan&TY=2024&FNY=&CSVF=TT&html.x=113&html.y=22&C=5JK&Filter=N With respect to the inclusion of exceptional/abnormal costs, these are too variable and site and scheme specific to assess explicitly within an area wide viability assessment. RBG and BNPPRE note that the Examiner for Bristol's CIL Charging Schedule identified at paragraph 26 that, *"By definition, the CIL cannot make allowance for abnormal, site specific, costs. The rates have to be based on a generic analysis of a variety of size and type of schemes across the area, taking into account average local build costs, not the individual circumstances of particular sites. The fact that a few specific schemes that are already marginal may become unviable in certain locations should not have a significant impact on the delivery of new housing across the city to meet the requirements of the adopted CS."* With respect to CBRE's comments on the benchmark land values, BNPPRE have provided a copy of their evidence supporting their assumptions on the rent for the secondary existing use values at Appendix B. RBG and BNPPRE would not expect a building which

Representor	Key points of representation	Royal Borough of Greenwich response
	a review of the RBG Local Plan. A call for Development Sites for Site Allocations Plan process due to commence in Autumn - Winter 2023 and consultation on the Draft Local Plan (Regulation 18) scheduled for Spring - Summer 2024 (dates TBC). 25. CBRE questions the logic and rationale, and efficiency in use of public funds, for introducing a CIL review at this juncture, when it would be expected that RBG will be targeting Regulation 19 consultation on a new Plan (and will need to conduct and publish a Plan-wide and CIL Viability Study to assess the viability of sites under emerging policies) in late 2023 / early 2024. 26. CBRE is firmly of the view that, based on the emerging Plan review, it is inappropriate and inefficient to embark on a CIL review at this juncture, when it will not account for the strategy, policies and infrastructure requirements of the borough to be set out within the forthcoming Plan review, and will undeniably need to be repeated in far greater detail (to account for the Plan review) in short order. Inflationary Effect on Adopted CIL Rates 27. Adopted CIL charging rates are inflated annually (from 1st January) based on the BCIS Community Infrastructure Levy (CIL) Index. The BCIS publishes the rate for the following year	makes optimum use of a site and that is attracting a rent in line with market norms to come forward for development, as residual value may not exceed current use value in these circumstances. RBG and BNPPRE would highlight that with respect to the GLi Platform's identified sites, the CIL charges will not be so significantly different from those currently charged in the adopted CIL charging schedule. Both sites are located in Zone 1 currently for which a residential charge of £102.97 per sq m is charged and are proposed to be in the revised DCS' CIL Zone 2, for which a charge of £96 per sq m would be levied. BtR schemes are currently charged CIL at the same rate as build for sale developments, consequently, there will be no change in this regard. The only change would be the adoption of a CIL charge on Co-living schemes and a nominal rate of £25 per sq m levied on "all other uses". However, these rates are unlikely to prevent development from coming forward given their level of charge. RBG considers that in charging a CIL rate on these uses which previously did not contribute towards infrastructure they have met the requirements of CIL Regulation 14, i.e. they have struck an appropriate balance between the desirability of supporting infrastructure and the potential effects (taken as a whole) of the imposition of CIL on the viability of development. BNPPRE have provided a sample of development appraisals at Appendix C. These reflect the six residential typologies at an average residential sales value of £660 per sq ft and a Borough CIL charge of £96 per sq m.

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	based on the RICS BCIS All-in TPI index figure as at 1st November the prior year. 28. The published index rate for 2023 is 355. 29. RICS BCIS All-in TPI was last updated by RICS on 9th June 2023. CBRE has provided the print-out for transparency within Enclosure 1. This confirms that the forecast 04 2023 rate is 388. Whilst this rate may be subject to change between now and 1st November 2023, based on the economic forecasting set out above, it is unlikely to reduce. 30. As a result, without any revision to the adopted RBG CS, the CIL rates would be expected to jump by 9.3% for any development schemes securing planning permission in 2024. 31. This is a very substantial increase, and will have a material impact on development viability - particularly when also considered in the context of construction cost inflation, weaking occupier market demand (and spending power) across multiple sectors (as above), and softening investment yields due to the increased costs of raising debt. 32. In summary, in the intervening period prior to RBG reviewing CIL comprehensively alongside the emerging Plan review, the indexation of the adopted CS will ensure rates proceed to increase annually with inflation. This will place an additional burden on development itself alongside wider negative economic and property market factors, in a high-inflation environment, but will	

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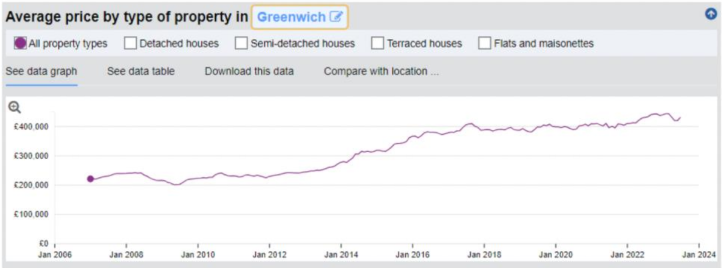
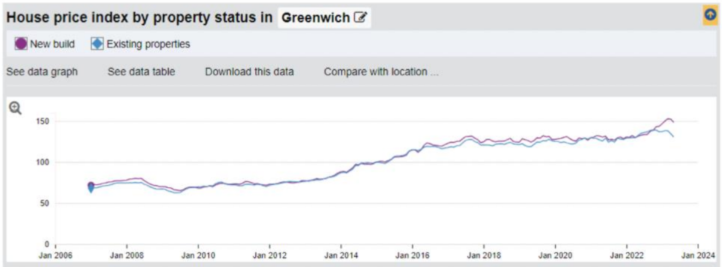
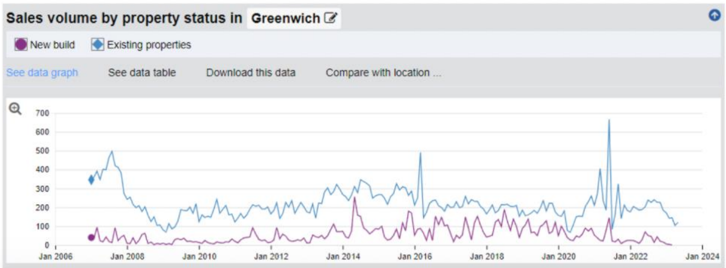
	not represent the scale of increased and unforeseen cost burden proposed within the CIL DCS. Outdated Evidence and Technical Deficiencies 33. The published available evidence to inform the CIL DCS is the CILVA, dated March 2023, prepared by BNP Paribas Real Estate ('BNPPRE'). 34. CBRE has reviewed the CIL VA report. It is apparent that the viability modelling, analysis, conclusions and recommendations rely upon evidence that pre-dates March 2023 and, with regards to the residential sales values, is actually reliant upon evidence that pre-dates August 2022. Residential (for Sale) 35. Up to date HPI data demonstrates that house prices are not increasing at the same trajectory as they were in July 2022 (and as set out within the CILVA). The latest HPI data is set out in Figure 1 & Figure 2. Figure 1: Average House Price (all property types) | Royal Borough of Greenwich	

Representor	Key points of representation	Royal Borough of Greenwich response
	 *Source: Land Registry Data* Figure 2: House Price Indices by property status (type) | Royal Borough of Greenwich  *Source: Land Registry Data* Figure 3: Sales Volume by property status (type) | Royal Borough of Greenwich 	

Representor	Key points of representation	Royal Borough of Greenwich response
	36. Figures 1 & 2 demonstrate that there is a falloff in house price growth into 2023. Figure 3 demonstrates that the sales volumes are down to historically low levels. 37. Figure 4.3.1 of the CILVA shows a large variation in £/ft2 achievable across RBG, however there are only two CIL zones. This demonstrates the limited robustness of the CILVA. 38. There have been significant macro-economic and market adjustment issues over this period, as well as introduction of new/updated Building Regulations, national planning policy requirements (e.g. First Homes) and substantive construction cost inflation, which are material considerations that any robust viability evidence base must account for. Residential (Build-to-Rent) 39. Build-to-Rent ('BtR') yields adopted in the CILVA at 3.5% and 3.65% are keener than are being achieved in the current market context. CBRE published data demonstrates that yields are softening across London Zone 2 (3.60%) and London Zones 3-6 (3.75%). Adoption of the rates in the CILVA are optimistic, and do not take into account locational factors within RBG which would affect investment appetite. CBRE consider there are locations (Thamesmead and Abbey Wood, for example) where a Net Initial Yield sharper than 4% is not achievable, with 4.25% yield being more realistic. The yields set out by	

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	BNPPRE are likely to reflect stabilised yields, rather than net initial yields. Co-Living 40. BNPPRE's adoption of 30% management and maintenance costs is on the low side, with rates for the high specification of co-living developments typically being up to £5k per unit at present. 41. The average unit size (40m²) adopted within the CILVA is significantly larger than typical room sizes in co- living development (being circa 20m²). This has the ability to impact the appraisal outputs, incorrectly ascribing viability/development value and the ability to contribute towards CIL. All other development 42. CBRE note that the CIL VA does not test any typologies falling under 'all other development' and concludes that: *"Should the Borough wish to do, they would be able to set a nominal rate of CIL on all other uses of say £25 per square metre. A nominal rate is unlikely to be a significant factor in developer's decision making."* 43. CBRE contend that CIL rates must be based on appropriate available evidence of the impact on viability. There is no evidence to justify that, at £25/m², the rate for all other development types will represent a nominal sum that would not have	

Representor	Key points of representation	Royal Borough of Greenwich response
	a material bearing on scheme viability. It is not possible to robustly determine whether it would impact on a developer's decision making. Build Costs 44. CBRE comment that there are severe limitations with the use of BCIS in isolation. For example, the adoption of a single rate for testing BtR developments (Flats - 6 or more storeys) is flawed and not representative of the market. BtR developments are typically in close proximity to public transport connections (e.g. Crossrail) whereby the residential units delivered are high and the towers built significantly higher than 6 storeys. 45. CBRE consider a more bespoke approach is required to test BtR development, more reflective of the market. Other Development Viability Assumptions 46. Development Finance. A development finance rate of 6.5% is not reflective of current funding conditions. The Sterling Overnight Index Average (SONIA) rate currently stands at 5.18%. Development finance lending is typically 4-5% above the SONIA rate, meaning a development finance rate of 9-10% is more appropriate for viability testing in the current market context. Funding rates are not expected to reduce considerably for several years.	

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	47. Exceptional costs. BNPRE does not account for any exceptional costs in the viability testing, which CBRE consider to be a limitation of the outputs. Benchmark Land Values 48. There are limitations with the determination of Benchmark Land Values (BLVs) in the CIL VA, including: a. Lack of supporting evidence to justify rental values for typologies tested (e.g. £12.5/ft2 for secondary offices in Typology 1); b. High allowances for refurbishment works. The refurbishment allowance deflates land value; and c. Low site coverages across all typologies. Typical site coverages for industrial uses are typically 40-50%, with much higher site coverages for offices. Open storage land is typically close to 100% useable and therefore the 70% rate is considered to be low. The low site coverages deflate land value, increasing the viability of the uses tested within the CIL VA. Failure to Strike an Appropriate Balance 49. In setting CIL rates, RBG must strike an appropriate balance between addiitonal investment to support development and the potential effect on the viability of developments. In accordance with CIL Regulation 14(2), RBG	

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	must be able to demonstrate and explain how the proposed CIL rate(s) will contribute towards the implementation of the Plan and support development across city. 50. As set out in PPG, Charging Schedules should be consistent with, and support the implementation of, up-to-date relevant plans. 51. This links back to the timing of the emerging local plan, where it is logical to ensure the evidence base is up to date concurrently. 52. The charging authority must take development costs into account when setting CIL rates, particularly those likely to be incurred on strategic sites or brownfield land. Importantly, development costs include costs arising from existing regulatory requirements, and any policies on planning obligations in the relevant Plan, such as policies on affordable housing. 53. As also clearly set out in the RICS Guidance, the impact on viability on CIL, whether proposed or existing, should be considered alongside the policy requirements of the Plan. In simple terms, a ‘policy-on’ approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for, and taking precedence over, the introduction of CIL rate setting. Lack of Transparency 54. There is a distinct lack of transparency throughout the BNPPRE report, which CBRE deems falls short of the requirements and	

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	expectations of PPG CIL (Paragraph: 019 Reference ID: 25-019-20190901), PPG Viability (Paragraph: 010 Reference ID: 10-010-20180724), the NPPF (para. 58), the RICS Guidance and RICS Professional Standards, and which does not facilitate the viability evidence being genuinely ‘available’ for stakeholders to analyse. 55. Specifically, whilst there are a substantive volume of summarising results tables within the report’s Appendices 2-7, none of the actual viability appraisals are published – not even an example appraisal for each typology, which would be the minimum CBRE would expect to see in a transparent and robust viability evidence base. As a result, stakeholders cannot see what the gross development value (GDV), construction and other costs, finance roll-up and other various key metrics represent within the typology appraisals – which means the actual viability testing evidence is not published and cannot be interrogated appropriately. **Conclusions and Recommendations** 57. GLi cannot endorse or support the CIL DCS, and its underpinning evidence base in the form of CIL VA, as presently published. 58. In fact, for the reasons set out in this document and its enclosures, GLi has fundamental doubts regarding the appropriateness of the timing of this consultation on a new CIL DCS. The	

Representor	Key points of representation	Royal Borough of Greenwich response
	consortium also has severe reservations regarding the questionable validity and dependability of the published viability evidence base upon which the proposed new charging rates (and zones) within the CIL DCS is reliant, and hence the legal compliance of the published CIL DCS with the relevant legislation and guidance. 59. On this basis, GLi cannot agree with RBG that there is an appropriately evidenced and legislatively compliant basis upon which the CIL DCS (as published) could be found sound by an independent Examiner, which should unavoidably lead to the rejection of the Charging Schedule in accordance with Section 212A(2) of the 2008 Act. 60. GLi therefore hopes that this feedback prepared by CBRE, is useful to RBG in reconsidering whether it is rational, prudent and justified to be proceeding with pursuing adoption of a substantially different CIL charging regime to that presently in force, under the current circumstances. 61. Nevertheless, should RBG determine to submit the CIL DCS for examination, in its current form and without rectifying the issues identified in this representation, Gli will be left with no choice but to continue to pursue this matter and will seek that the Examiner rejects the Charging Schedule via the examination process.	

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	62. Should RBG wish to engage directly with GLi on the matter, CBRE will be able to facilitate such arrangements.	
TTL Properties Limited	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. 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: • Arsenal DLR: TfL owns land over and immediately around the Woolwich DLR station	RBG note that the maps identified were not appended to the original representation submitted. RBG contacted TTL Properties ('TTLP') to identify this and requested that they forward the maps. These were received on 03/10/2023. RBG notes TTLP's Planning team's comment about their separate role to TfL's Spatial Planning team and that representations have been received from both entities. RBG notes the two sites identified by TTLP and comment on these as follows. The first site (land around Woolwich Arsenal DLR) is located in current CIL Zone 1 for which a CIL charge of £70 per sq m unindexed and £102.97 indexed to 2024 CIL rates (as published in RBG's Annual CIL Rate Summary 2024) applies. RBG's Revised DCS places the site within the new Zone 2, for which a charge of £96 per sq m is proposed. This rate was in line with the 2023 indexed Zone 1 CIL rate, however based on the 2024 indexed CIL rate for Zone 1 there has effectively been a small decrease in the CIL liability on the site and not an increase. With respect to the second site identified by TTLP's representation, this is actually formed of two separate Sites in Prime locations directly adjacent to the River Thames. The sites are severed by the prominent A2204

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	(please see map in appendix 1). Part of the site has a draft site allocation (Site W10DLR 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 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.	road/Ferry Approach that accesses the Woolwich Ferry South Pier with the Woolwich Ambulance Station located in the middle of the eastern site. Looking at the map provided by TTLP, there appears to be a complex picture of land ownership, licences, leaseholds and rights over the wider land area. RBG notes that the two “sites” that make up TTLP’s “Land to the north of Woolwich High Street” are not allocated for development in the adopted Development Plan or the RBG Site Allocations Proposed Submission (Reg 19) (2021). These two sites will need to be considered as part of the Local Plan Review once clarity is provided around the future of the Woolwich Ferry. Based on this, it is expected that delivery of these sites would be longer term and is likely to fall under the next CIL charging schedule review. The western part of the Ferry site is currently undeveloped. It consists of hardstanding forming the Ferry’s queueing area used by traffic to wait to board the Ferry. As with the previous Woolwich Arsenal DLR site, this site is located in the adopted CIL Charging schedule’s Zone 1 area and in RBG’s Revised DCS is located within the new Zone 2, and consequently the proposed CIL rate would be marginally lower than the indexed CIL rate currently charged in 2024. The eastern part of the Ferry site is occupied by a storage depot with an area of hardstanding to the north fronting the River Thames, which is used for parking and open storage. There is a further area of hardstanding to the south of the depot building with car parking and a small private fuel filling station. An area of landscaping forms the

Representor	Key points of representation	Royal Borough of Greenwich response
	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.	southern and southwestern boundary separating the site from the pavement and road network. As previously identified within the western part of the Ferry site is a section of land, accessed from the A2204, which is excluded from TfL/TTLP's land ownership, which is occupied by the Woolwich Ambulance Station. In light of this, RBG is conscious that critical to any development of the TfL/TTLP site would be the careful consideration of the operation of the Woolwich Ambulance Station as well as Woolwich Ferry. Significant work needs to be undertaken given the constraints and uncertainty around adjacent sites before this site can be brought forward. The eastern part of the Ferry site is located within Zone 1 in the adopted CIL Charging Schedule, and this has been maintained as such in the Revised DCS. BNPPRE's viability assessment has identified that the proposed uplift in the adopted indexed CIL charge from £102 .97 per sq m to £150 per sq m. The overall charge reflects a cost to development of 2.5% with the uplift being a small increase of circa 0.83%. This level of increased cost to development is not likely to be a defining factor as to whether a development is able to come forward or not. As recognised by TTP and by TfL in their separate submissions, CIL funds deliver vital infrastructure that support the growth and development coming forward in the Borough, including contributions towards the delivery of transport infrastructure delivered by TfL. To this end, RBG is confident that in increasing the CIL charge in Zone 1 by 0.83% they have struck an appropriate balance as required by the CIL Regulations (as amended) Regulation 14, between the desirability of

Representor	Key points of representation	Royal Borough of Greenwich response
	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. 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	supporting infrastructure and the potential effects (taken as a whole) of the imposition of CIL on the viability of development. The proposed updated Zone 1 charge is identified as amounting to a total average of circa 2.5% of development costs. As previously identified, this is not an entirely new cost to development, and the proposed Zone 1 CIL Charge With respect to abnormal costs in development, RBG appreciates that some (but not necessarily all) of TTLP/TfL's sites will incur abnormal costs associated with development, given the nature of many of the sites in their portfolio. RBG and BNPPRE note that the Examiner for Bristol's CIL Charging Schedule identified at paragraph 26 that, *"By definition, the CIL cannot make allowance for abnormal, site specific, costs. The rates have to be based on a generic analysis of a variety of size and type of schemes across the area, taking into account average local build costs, not the individual circumstances of particular sites. The fact that a few specific schemes that are already marginal may become unviable in certain locations should not have a significant impact on the delivery of new housing across the city to meet the requirements of the adopted CS."* The Council took the decision to withdraw Exceptional Circumstances relief which took effect from 29th September 2022. At this stage the Council does not intend to reintroduce this.

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	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 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	

Representor	Key points of representation	Royal Borough of Greenwich response
	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	

Representor	Key points of representation	Royal Borough of Greenwich response
	which has the potential to provide such a high degree of local social, environmental and economic benefits. 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. 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. 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).	

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	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.	
Quod, on behalf of Knight Dragon	Knight Dragon is leading the regeneration of the Greenwich Peninsula (ref: 19/2733/O and 15/0716/O), which is delivering over 17,000 homes, including over two and a half thousand affordable homes (37% Affordable delivered to date) in a large mixed-use development, bringing substantial public benefits through the provision of new public spaces and community facilities, employment and jobs, and facilities for health, education and sport. Whilst development has commenced on a number of Plots and significant infrastructure (including an all-through school) have been delivered to date, there are still significant parts of this strategic development that could be affected by increases in rates, including in the event of Section 73 Applications or phases that are yet to reach the time at which planning permission first permits development. Based on the current planning position, this could potentially affect at least 17 plots of the current permissions affecting 15,000 homes.	RBG appreciates that there has been uncertainty in the market over recent months, however market reports are looking more optimistic. We note that in their January 2024 Housing Market update report, Savills identify that, *"…The relative resilience of house prices has been supported by falling mortgage rates. Lenders have been cutting rates to compete in a low activity market and doing so in anticipation of an earlier reduction in the Bank of England base rate.* *The first base rate cut is now expected in May* [2024]*, according to Oxford Economics, much sooner than previously forecast…"* Notwithstanding the above, RBG would highlight that their current CIL charging schedule, which was adopted in March 2015 and introduced in April 2015, was based on market data from between 2012 and 2014 i.e. ten years ago. The market and development and regeneration in RBG has changed and progressed significantly since then and as a consequence RBG has sought to review its CIL rates and boundaries based on the current position and market evidence available.

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	This means that, while Knight Dragon's Section 106, including its affordable housing provision, is fixed (or only subject to potential increases through the review mechanism), the CIL rate per sqm could significantly increase with the proposed CIL rate changes. This proposed increase in CIL could affect the development and Knight Dragon's ability to ensure it remains deliverable and viable. Knight Dragon recognises the importance of funds to deliver infrastructure and has therefore committed to £980m of infrastructure investment outside of on-plot works common to all sites). More detail is presented on this in the sections that follow, but it is clear that mitigation for infrastructure is an inherent part of the Knight Dragon planning permissions and additional burden is neither justified (on impact grounds) nor insignificant (in the context of the already very challenging viability position). Knight Dragon is concerned that substantial rises to the CIL chargeable rates are being proposed at a time when viability of all housing-led development is deeply challenging due to the current interest rate, regulatory and inflation environment. Transaction volumes and values have decreased while financing costs and construction costs have risen. There is currently deep uncertainty around if and when inflation (and therefore base rates on which mortgages are based) will stabilise.	The Halifax reported in their December 2023 House Price Index Report that *"Average house prices rose by +1.1% in December, the third monthly rise in a row"* and that *"The housing market beat expectations in 2023 and grew by +1.7% on an annual basis"*. The Land Registry House Price Index ('LR HPI') reports on housing nationally as well as more locally. BNPPRE have reviewed house price evidence from the LR HPI data specifically from the Royal Borough. The LR HPI data identifies that in RBG new build house prices have increased by 49% since March 2015 i.e. the point at which the current charging schedule was adopted. We also note that the LR HPI data reflects new build house prices in RBG as having increased by 13% between March 2022 and September 2023 (the most recent month for which data on house prices are reported currently). The LR HPI data also reports an increase of 3% in the average price of existing properties in the Borough between March 2022 and September 2023. Understandably the key data to be considered for the CIL viability evidence is that of new build homes given that the CIL charge relates to new development. The future trajectory of house prices is currently uncertain, although forecasts from the main property agents indicate that values are expected to increase over the next five years. Medium term predictions are that properties in Mainstream London markets are forecast to grow over the period between 2025 and 2028. Prices will stay static or soften a little in 2024 and then increase in the subsequent years to increase cumulatively by 13.9% to 20.2%.

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More detail on market challenges and uncertainty is presented below.

In this climate, Knight Dragon would welcome an approach that recognises both the importance and the challenges for them in delivering the borough’s strategic development locations. We encourage both prudence and rigour in setting rates, specifically with respect to Planning Practice Guidance requirements for strategic development locations to be assessed for viability on a site-by-site basis, reflecting their unique challenges and abnormal costs.

The sections that follow present more detail on our specific concerns regarding:

• Adherence to Planning Practice Guidance on charge setting

• Assumptions in the viability assessment regarding:
  • Costs
  • infrastructure delivery
  • values.

Planning Practice Guidance sets out how Local Authorities should go through the process of setting their proposed rates for the Community Infrastructure Levy in
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<table>
<tr><th>Agent</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th><th>Cumulative growth 2023 – 2026/7</th></tr>
<tr><td>Savills – Mainstream Central London Q4 2023</td><td>-4.0%</td><td>+2.0%</td><td>+4.0%</td><td>+6.0%</td><td>+5.5%</td><td>+13.9%</td></tr>
<tr><td>JLL – Greater London Q4 2023</td><td>-2.0%</td><td>+3.5%</td><td>+4.5%</td><td>+4.5%</td><td>+5.0%</td><td>+16.3%</td></tr>
<tr><td>CBRE – London Q4 2023</td><td>-1.0%</td><td>+5.1%</td><td>+6.1%</td><td>+4.9%</td><td>+3.8%</td><td>+20.2%</td></tr>
</table>
BNPPRE have identified that the proposed residential CIL rate increase on the Greenwich Peninsula from £102.97 per sq m to £150 per sq m accounts for a small percentage of development costs, identified as being an average of 0.83%. At £150 per sq m, the CIL charge would account for a total of 2.5% of development costs, of which 1.67% is already embedded in the market through the currently adopted CIL charge.

RBG’s CIL viability evidence has been tested based on a set of typologies. RBG notes that the PPG on Viability identifies that when testing the viability of plans individual testing of every site or assurance that individual sites are viable is not required, and the use of typologies to determine viability is a reasonable approach.

Paragraph: 018 Reference ID: 10-018-20190509 of the PPG on Viability identifies that, “For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return
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Representor	Key points of representation	Royal Borough of Greenwich response
	their ‘Charging Schedule’. This expands on the statutory requirements set out in the Planning Act (2008), Localism Act (2011) and CIL Regulations (2010) as amended. As a starting point Charging Schedules should: *“be consistent with, and support the implementation of, up-to-date relevant plans.”* (PPG Ref: 25-011-20190901). The Royal Greenwich Local Plan: Core Strategy with Detailed Policies was adopted in 2014. It is not therefore up to date. However, it does confirm that Knight Dragon’s land falls within Significant Housing Sites and Strategic Development Locations, stating that, *“This area will provide a significant proportion of Royal Greenwich's new housing, as well as providing a wide range of jobs and other facilities (Para 3.3.18).”* It goes on to emphasise the importance of on-site facilities and integration with transport networks, open space, employment and entertainment. The London Plan (2021) is also a relevant plan for these purposes, and identifies Opportunity Areas, including Greenwich Peninsula confirming the strategic importance of this site, and the significant growth required here. In total, the Opportunity Area is intended to deliver 17,000 new homes and 15,000 new jobs, given	*to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types.”* The viability testing includes profit allowances of 17.5% on private residential development and 6% on affordable housing along with 15% on commercial uses. In both RBG and BNPPRE’s experience these allowances are appropriate and in line with both the guidance in the PPG as well as normal market assumptions adopted in viability assessments of actual schemes coming forward in the Royal Borough and across London as well as and in CIL viability assessments. With respect to the inclusion of exceptional/abnormal costs, these are too variable and site and scheme specific to assess explicitly within an area wide viability assessment. RBG and BNPPRE note that the Examiner for Bristol’s CIL Charging Schedule identified at paragraph 26 that, *“By definition, the CIL cannot make allowance for abnormal, site specific, costs. The rates have to be based on a generic analysis of a variety of size and type of schemes across the area, taking into account average local build costs, not the individual circumstances of particular sites. The fact that a few specific schemes that are already marginal may become unviable in certain locations should not have a significant impact on the delivery of new housing across the city to meet the requirements of the adopted CS.”*

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	the majority will be delivered within Knight Dragon's masterplan boundary, this demonstrates how critical this permission is to the delivery and success of this area. In setting its CIL charge an Authority should use appropriate available evidence involving a broad test of viability across the area. (PPG Ref: 25-020-20190901). However, where there are significant strategic sites which are important to delivery of the 'Relevant Plan' these should be dealt with separately. This can include setting differential rates for development including low or zero rates for sites with low viability (PPG Ref: 25-022-20230104). In particular: *Differential rates for geographic zones can be used across a charging authority's area. Authorities may wish to align zonal rates for strategic development sites. Viability guidance sets out the importance of considering the specific circumstances of strategic sites ('Why should strategic sites be assessed for viability in plan making?'). This includes the potential to undertake site specific viability assessments of sites that are critical to delivering the strategic priorities of the plan.* *Charging authorities may want to consider how zonal rates can ensure that the levy compliments plan policies for strategic sites. This may include setting specific rates*	With regard to the residual S106 allowances included in the viability assessment, RBG undertook analysis of the financial contributions secured through S106 agreements signed over the previous three years. This analysis indicated an average residual S106 requirement of circa £3,000 per unit for residential uses and circa £30 per square metre for commercial uses. These allowances are considered to be a reasonable assumption based on the average scheme allowance. RBG and BNPPRE note that actual amounts of S106 are of course subject to site-specific matters and negotiations when schemes are brought forward through the development management process and consequently are likely to vary, and this position is acknowledged in the viability study. RBG would highlight that Knight Dragon have secured outline consents for the delivery of the development envisaged on the Peninsula, for which there is an overarching S106 agreement secured. Knight Dragon have been working towards achieving reserved matters application against the outline consent and bringing forward the development on the Peninsula. RBG considers the proposed CIL rate is set at a reasonable level and that at 0.83%, the increase in the proposed CIL rate is very unlikely to be the determining factor as to whether or not a developer brings forward a site for development. Additional analysis of this uplift by BNPPRE has indicated that this cost reflects an opportunity cost of less than 1% of affordable housing in a scheme. Moreover, the funding secured through the CIL will support the growth being delivered in RBG through the provision of much needed infrastructure. To this end RBG considers that it has set its revised CIL rates in line with the requirements of the CIL Regulations 2010 (as amended). Regulation 14 requires a charging authority to strike an appropriate balance between additional investment

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<tr><td></td><td>for strategic sites that reflect the land value uplift their development creates. Low or zero rates may be appropriate where plan policies require significant contributions towards housing or infrastructure through planning obligations and this is evidenced by an assessment of viability. (PPG Ref: 25-026-20190901)

As set out in more detail below, Knight Dragon is concerned that there has been insufficient consideration of the specific circumstances of their remaining phases in setting the proposed charges.

The Consultation for the Revised Draft Charging Schedule includes the schedule itself and a Viability Study Update. Proposed residential rates are based on two Zones. Zone 1 is non-contiguous and covers Greenwich Peninsula and Woolwich Town Centre. Zone 2 covers the rest of the Borough.

The Viability Study, which provides the Evidence Base for these rates, identifies the strategic development locations in the Borough (Paragraphs 2.58 to 2.64) including the Peninsula site SO1 (Para 2.59).

This is not, however, carried forward into the viability assessment itself and the summary of the requirements for assessment set out in paragraph 6.3 does not refer to strategic sites and how their specific costs or challenges</td><td>to support development and the potential effect on the viability of developments.

RBG has received advice from their appointed site-specific viability consultants, BPS, in relation to the viability work that they have recently undertaken on the 1st stage viability review of Knight Dragon's development on behalf of RBG's Development Management team.

BPS have advised that, in providing their analysis on the impact of the proposed revised CIL charging schedule rates on the Knight Dragon Development, they have updated the application stage model to reflect the changes proposed within the 1st stage review, which impacted the application stage assumptions in respect of Plots 1.02, 1.03, 19.05 and 121.

BPS have set out the viability position of Knight Dragon's development based on a number of CIL scenarios as set out in Table 1 below.

Table 1 BPS sensitivity analysis of CIL on Knight Dragon's Development Viability Position.

<table><tr><th>Scenario Tested</th><th>IRR %</th><th>Profit on GDV %</th><th>CIL as a % of Dev costs</th><th>Total CIL Generated (inc MCIL)</th></tr><tr><td>1st Stage review</td><td>6.31</td><td>18.24</td><td>1.55</td><td>£106,606,198</td></tr></table></td></tr>
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<tr><th>Representor</th><th>Key points of representation</th><th>Royal Borough of Greenwich response</th></tr>
<tr><td></td><td>are dealt with in the assessment as required by the PPG. Instead, the assessment sets out sales values across broad value zones (Figure 4.3.1) and then applies generic assessments to these areas. It does not include any exceptional costs and Section 106 assumptions are de minimis. Developer profit assumptions are based on relatively low profit margins, particularly given the current position in the market.

The Greenwich Peninsula site is substantially different in its approach to infrastructure when compared to other schemes within RBG. The site is delivering its own new road network, utilities, public realm and social infrastructure. Detailed costs for this infrastructure have been agreed with RBG as part of the development planning process. The borough’s consultants, BPS, reviewed the costs of infrastructure at the time of the application and more recently in March 2023 when the first submissions under the scheme review mechanism were made. The infrastructure cost (outside of on-plot works common to all sites) currently stands at c.£980m.

The BNP Paribas Viability Assessment includes assumptions about benchmark land values. Historic costs incurred for enabling this to come forward for development at Greenwich Peninsula represent a higher land cost per sqft than the BLV used in the assessment and there is now no opportunity for the adjustments</td><td><table>
<tr><td>Adopted CIL indexed to 2023</td><td>6.26</td><td>18.11</td><td>1.71</td><td>£118,177,449</td></tr>
<tr><td>Adopted CIL indexed to 2024</td><td>6.22</td><td>18.04</td><td>1.81</td><td>£124,939,814</td></tr>
<tr><td>RBG Proposed New CIL charge</td><td>6.02</td><td>17.54</td><td>2.45</td><td>£170,312,540</td></tr>
<tr><td>No RBG CIL</td><td>6.67</td><td>19.11</td><td>0.40</td><td>£26,885,512</td></tr>
</table>
BPS’s analysis has identified that BNPPRE’s assessment of the proposed revised RBG CIL accounting for circa 2.5% of development costs is a cautious figure, as the proposed revised CIL charge would actually account for 2.45% of costs in the development inclusive of Mayoral CIL, which is identified as accounting for 0.4% of development costs.

Excluding Mayoral CIL, the revised RBG CIL charge would account for 2.05% of costs in the development. Further, BPS’s analysis identifies that the existing CIL charge (including Mayoral CIL) as at 2024, embedded in the Knight Dragon’s development’s costs amounts to 1.81% (1.41% excluding Mayoral CIL). Therefore, the revised RBG CIL charge actually reflects an increase in costs to the development of 0.64%.

This small increase in the CIL charge on the scheme is seen to have a nominal impact on the scheme’s overall viability position, reducing the IRR profit measure from 6.22% to 6.02% and the profit assessed as a percentage of GDV from 18.04% to 17.54%.</td></tr>
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Representor	Key points of representation	Royal Borough of Greenwich response
	described in the BNP Paribas viability assessment to take place. Given the infrastructure costs noted above, viability of the Greenwich Peninsula site is inevitably challenging. RBG's consultants, BPS, confirmed this in its November 2020 report ahead of the scheme planning committee. BPS advised that the scheme is reliant on securing growth in sales values well in excess of cost growth in order to return a reasonable minimum developer return. BPS identified that sustained real terms growth over the life of the scheme is required and that the prospects of this achieving any surplus profit were minimal. Whilst it was considered that the scheme was deliverable at the current viability output, this required Knight Dragon to take substantial risk and achieve future targets to moderate costs whilst achieving value growth. All of this was agreed on the basis of the currently adopted RBG CIL rates – to materially increase these clearly risks deliverability of the masterplan and the associated affordable homes and infrastructure. The importance of the viability challenges and costs associated with strategic sites are such that they are often recognised in other authorities through nil rated or low rated zones. Examples of this include Woodberry Down in Hackney, Meridian Water in Enfield, and Earls Court in Hammersmith and Fulham and Kensington and Chelsea. We suggest RBG should consider adopting a	BPS have advised that the appraisal model of the Knight Dragon development reflects a positive profit for the developer reflecting a return on GDV of 18.04% but an IRR of 6.22%. The development has a target IRR for the drop in application of 14% and 20% retained in relation to the rest of the scheme. Consequently, the removal of the Borough's CIL liability would make a very nominal improvement in the scheme viability, increasing the IRR to 6.67% (i.e an increase of 0.65%) and the return on GDV to circa 19.11% a movement of about 1.57%. In both BNPPRE's and BPS's experience, the nominal increase in the CIL charge is highly unlikely to be the determining factor as to whether a developer will bring forward a development. RBG notes that Knight Dragon has been committed to delivering the Peninsula development including the CIL liability to date, and consequently nil rating the scheme as shown by BPS' analysis would not make a significant impact on the viability of the development, however it would have a significant impact on the funding secured by RBG to deliver critical infrastructure to support the growth in the Royal Borough. In light of this position, RBG considers that the proposed increase to their CIL charge in the Borough will not jeopardise the delivery of Knight Dragon's development.

Representor	Key points of representation	Royal Borough of Greenwich response
	similar approach for strategic sites in their borough, like Greenwich Peninsula. None of the typologies in the assessment make appropriate assumptions about large scale, strategic, multi-phased development with significant infrastructure costs. As indicted above, the total infrastructure cost for Greenwich Peninsula is c.£980m including, for example: • Energy Centre • Two primary schools on-site and £24m (+indexation) for off-site secondary provision (in addition to 1 all-through school delivered to date) • Swimming pool and all-weather pitch • The Tide • The Waste Transfer Centre • The Design District. Large scale development therefore has demonstrably different characteristics from the typologies assessed in the viability study, and therefore RBG has not provided 'appropriate available evidence' that proposed CIL rates are appropriate for this location. Reviewing the infrastructure delivery plan provided in support of the Draft CIL Charging schedule, there is a significant overlap when the infrastructure identified as	The purpose of the Council's Infrastructure Delivery Plan (IDP) is to identify the infrastructure needed to support sustainable growth. This includes infrastructure that has already been agreed as part of existing s106 agreements because this infrastructure is yet to be delivered. The identification of such infrastructure within the IDP highlights its crucial role in supporting future development. Furthermore, the IDP identifies that developer contributions (in the form of both S106 and CIL) will not be the only form of funding required to deliver the identified infrastructure. Indeed, CIL is intended as a top-up funding source to ensure delivery rather than the sole source of funding of any particular project.

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<tr><td></td><td>needed to support growth and the investment already secured through the Knight Dragon S106. This could lead to “double dipping” with Greenwich Peninsula effectively mitigating any impacts of their development twice and liable for a more than proportionate share of the borough’s infrastructure programme.

<table>
<tr><th>Infrastructure Identified in IDP</th><th>Summary of S106 already secured f
Greenwich Peninsula</th></tr>
<tr><td>Digital connectivity</td><td>All required servicing provided on-site</td></tr>
<tr><td>Energy</td><td>Carbon off-set contribution
Energy centre
Decarbonisation strategy and monitoring
Heating distribution pipework
Battery storage network infrastructure</td></tr>
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<tr><td></td><td>
<table>
<tr><th>Infrastructure Identified in IDP</th><th>Summary of S106 already secured for Greenwich Peninsula</th></tr>
<tr><td></td><td>Power supply improvements /diversions etc.</td></tr>
<tr><td>Transport</td><td>The Tide, highway junctions and highway improvements, Thames Path improvements, Riverside Walkway, Bus Station and service improvement contribution, car club. Wayfinding signage etc.

Feasibility studies for/consultancy frees for contributions to coach parking, Riverside Transit, New River Pier, Port of London Authority, Blackwall Tunnel Build over Silvertown Tunnel, LUL,</td></tr>
<tr><td>Waste</td><td>Full waste disposal strategy inc. refuse centre</td></tr>
<tr><td>Water and Drainage</td><td>All required upgrades and diversions</td></tr>
<tr><td>Community facilities</td><td>Schools – two schools on-site plus £24m of off-site contributions, construction of St Mary Magdalene school
Nursery provision
Community Fund
Prayer centre
Affordable Commercial Space Fund</td></tr>
<tr><td>Cultural facilities</td><td>Delivery of Design District providing a cluster of small scale buildings, predominately for the creative industries at the heart of the Peninsula.</td></tr>
<tr><td>Education</td><td>Two on-site primary schools; off-site contributions to secondary school; employment and training; delivery of St Mary Magdalene;
Site servicing for Ravensbourne University</td></tr>
<tr><td>Emergency services</td><td>n/a</td></tr>
<tr><td>Health and social care</td><td>Health centre on-site capital funded</td></tr>
<tr><td>Sport and leisure</td><td>Swimming pool, all weather pitch, open space</td></tr>
<tr><td>Green infrastructure</td><td>On-site open space and public realm</td></tr>
</table>

As of writing this report (September 2023) values are currently down -5.3%3 on a year ago according to Nationwide, with the possibility that prices will decrease further. Given that the actual course of 2023 is more challenging than in the projected “Downside” envisaged</td><td></td></tr>
</table>

Representor	Key points of representation	Royal Borough of Greenwich response
	in the Viability Update Study (downside of -5% in 2023 following by stabilisation and growth in years to come), the outlook for price growth and cost inflation could be significantly more challenging than this "worst case" scenario envisages. As set out by Nationwide Chief Economist, last month: "The softening [to -5.3%] is not surprising, given the extent of the rise in borrowing costs in recent months, which has resulted in activity in the housing market running well below pre-pandemic levels. For example, mortgage approvals have been around 20% below the 2019 average in recent months and mortgage application data suggests the weakness has been maintained more recently. The year-on-year average property price change and House Price Index (Land Registry Jan 2015 – August 2023) demonstrate: • value growth is back to rates seen in early 2020 which supports a cautious outlook and • All-in-TPI growth rates have well exceeded the HPI since 2017 which shows that indexation is already more than proportionately increasing CIL rates when pegged against the HPI for flats and maisonettes.	

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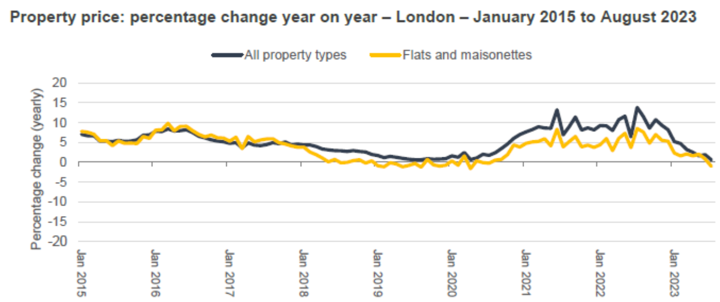
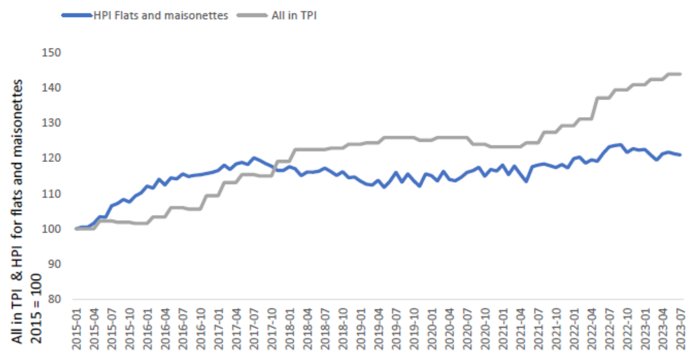
	 Source: Land Registry  Source: Land Registry and BCIS Given current market uncertainty and delays, we recommend that the Council consider taking into account further site specific evidence, which we can provide if	

Representor	Key points of representation	Royal Borough of Greenwich response
	helpful, to ensure that development on these critical sites is still viable. As set out above the viability for Greenwich Peninsula was agreed based on existing CIL rates, increasing the amount of CIL due will therefore challenge the viability and deliverability of this key strategic site. We would welcome RBG to review its viability on a site-by-site basis for such strategic sites, especially considering the recent changes to the macroeconomic environment.	
Quod, on behalf of Berkeley Homes (East Thames) Ltd	This letter is in response to the Draft Charging Schedule Consultation on behalf of Berkeley Homes (East Thames) Ltd (BHET). Firstly, we welcome the opportunity to comment and would be happy to take part in any further discussions or reviews that would be useful. BHET is passionate about the growth of RBG, being the 3rd largest employer in the Borough. Berkeley has its permanent divisional office at Royal Arsenal Riverside, which makes the business not only a developer but also investor and commercial tenant. The business is stitched into the local community and knows what really matters to local people. BHET has delivered and continues to deliver thousands of new homes across its Royal Arsenal Riverside,	RBG recognise that Quod's simple analysis of the percentage increase in the CIL charge by 254% in the Plumstead West Thamesmead location is methodologically correct. However, this approach to measuring the rate increase can be misleading and unhelpful as the increase is expressed by reference to the starting point charge, and provides no information as to the likely impact on the development of such a charge. To provide a simple example, if a rate of say £10 per sq m were to be increased by 50% this would take the charge up to £15 per sq ft. An increase of 50% appears to be significant, however this in fact only represents a £5 per sq m increase. More particularly however, the percentage uplift does not identify the impact on development viability of such a charge. To this end BNPPRE have identified that the proposed rate increase in the Plumstead West Thamesmead area from £58.84 per sq m to £150

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	Kidbrooke Village and Plumstead West Thamesmead communities and hopes to do so at the Woolwich Armourer's Court site (OSD East). To date these developments have delivered over six thousand new homes, including one thousand eight hundred affordable homes, half a million square feet of community and commercial space and contributed over £41m in CIL & S106 contributions. BHET has created beautiful new public spaces including creating 86 acres of parkland at Kidbrooke, world class infrastructure that includes delivery of the Woolwich Crossrail Box and providing funding every year to a wide range of community arts and cultural events in the Borough as well as providing 180,000 square feet across five listed buildings for Woolwich Works. BHET builds on the principle that reviving under-used spaces is vital to re-energising our cities and town centres and creates an increasingly sustainable, inclusive, and low carbon model of modern living, in which land, energy and infrastructure are used efficiently and responsibly. BHET purpose is to create quality homes, strengthen communities and improve lives, using its sustained commercial success to make valuable and enduring	per sq m accounts for a small percentage of development costs, identified as being on average an increase of circa 1.25%. The increase in the proposed CIL rate in the Armourer's court area from £102.97 per sq m to £150 per sq m reflects an increase in costs to a development of 0.83%. At £150 per sq m, the CIL charge would account for a total cost of 2.5% of development costs. In the Plumstead West Thamesmead area 1.2% of these CIL costs are already embedded in the market through the currently adopted CIL charge, whilst in the Armourer's court area this figure is 1.67%. RBG as the Charging Authority considers that this analysis demonstrates that the proposed CIL rate is set at a reasonable level and moreover that these increases in the CIL rates are very unlikely to be the determining factor as to whether or not a developer brings forward a site for development. Moreover the funding secured through the CIL will support the growth being delivered in the RBG through the provision of much needed infrastructure. To this end RBG considers that it has set its revised CIL rates in line with the requirements of the CIL Regulations 2010 (as amended). Regulation 14 requires a charging authority to strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. With respect to the inclusion of exceptional/abnormal costs, these are too variable and site and scheme specific to assess explicitly within an area wide viability assessment. RBG and BNPPRE note that the Examiner for Bristol's CIL Charging Schedule identified at paragraph 26 that, *"By*

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	contributions to society, the economy, and the natural world. BHET has three major developments in delivery, Royal Arsenal Riverside, Kidbrooke Village and Plumstead West Thamesmead. While planning permissions have been implemented, and many phases commenced or completed across these developments, there are significant parts of the these and future strategic developments that could be affected by an increase in rates, including in the event of Section 73 Applications to phases. Based on current planning strategies this could affect the deliverability of over 3,100 homes. The Viability Assessment provided in support of the proposed rates is based on an underestimate of costs, and an over estimate of values for strategic, large scale sites with abnormal costs and signification Section 106 requirements. The rezoning of PWT from Zone 2 to Zone 1 is of particular concern, and is not supported by the valuation evidence. 1. BHET consider the proposed Draft Charging Schedule will impact disproportionately on strategic developments, including BHET's Plumstead West Thamesmead and Armourer's Court developments. In particular, Plumstead West Thamesmead is proposed to have CIL charge increase by 254%,	*definition, the CIL cannot make allowance for abnormal, site specific, costs. The rates have to be based on a generic analysis of a variety of size and type of schemes across the area, taking into account average local build costs, not the individual circumstances of particular sites. The fact that a few specific schemes that are already marginal may become unviable in certain locations should not have a significant impact on the delivery of new housing across the city to meet the requirements of the adopted CS."* RBG notes that whilst an increase in rates could affect S73 applications, these applications are intended to be non-material changes to existing planning permissions, therefore increases in floorspace are typically modest in relation to the overall scheme. In addition, the increase in CIL rates is minimal and very unlikely to be the determining factor influencing a developer's decision to bring a site forward for development, as set out above. RBG appreciates that there has been uncertainty in the market over recent months, however market reports are looking more optimistic. We note that in their January 2024 Housing Market update report, Savills identify that, *"…The relative resilience of house prices has been supported by falling mortgage rates. Lenders have been cutting rates to compete in a low activity market and doing so in anticipation of an earlier reduction in the Bank of England base rate.*

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	BHET consider the evidence does not support this increase. 2. Strategic sites are often the most challenging and can have significant abnormal costs, the Charging Schedule should offer flexibility. BHET propose that in line with Planning Practice Guidance requirements, CIL in strategic development locations CIL is assessed on a site-by-site basis, reflecting their unique challenges and abnormal costs to encourage delivery of these sites. 3. The proposal does not consider the timeframe for developments to come forward. BHET extant planning permissions could be constrained in making changes via S73 applications for the latest fire safety requirements due to the proposed increase in CIL charging. 4. Based on BHET delivery in RBG, the viability assessment costs, values and market dynamics set out in the proposal are not considered to be reflective and therefore should be amended. Updating the viability assessment should result in a change to the proposal. Viability of all housing-led development is deeply challenging, at a time where delivery should be encouraged the proposal adds further viability challenges.	*The first base rate cut is now expected in May* [2024]*, according to Oxford Economics, much sooner than previously forecast…"* Notwithstanding the above, RBG would highlight that their current CIL charging schedule, which was adopted in March 2015 and introduced in April 2015, was based on market data from between 2012 and 2014 i.e. ten years ago. The market and development and regeneration in RBG has changed and progressed significantly since then and as a consequence the RBG has sought to review its CIL rates and boundaries based on the current position and market evidence available. The Halifax reported in their December 2023 House Price Index Report that *"Average house prices rose by +1.1% in December, the third monthly rise in a row"* and that *"The housing market beat expectations in 2023 and grew by +1.7% on an annual basis"*. The Land Registry House Price Index ('LR HPI') reports on house nationally as well as more locally. BNPPRE have reviewed house price evidence from the LR HPI data specifically from the Royal Borough. The LR HPI data identifies that in the RBG new build house prices have increased by 49% since March 2015 i.e. the point at which the current charging schedule was adopted. We also note that the LR HPI data reflects new build house prices in RBG as having increased by 13% between March 2022 and September 2023 (the most recent month for which data on house prices are reported currently). The LR HPI data also reports an increase of 3% in the average price of existing properties in the Borough between March 2022 and September 2023. Understandably

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	BHET is particularly concerned about the proposed Draft Charging Schedule impact on Plumstead West Thamesmead (PWT), which has planning permission for 40% affordable housing and is still in the early stage of its delivery. PWT is proposed to be moved from Zone 2 to Zone 1, amounting to an increase of £91 per sqm for residential floor area, from £59 to £150 per sqm (using 2024 projected indexation). The Armourer's Court development that currently has resolution to grant would also be affected, with a projected increase of £47 per sqm from £103 to £150 per sqm. The development proposes 35% affordable housing and so would be significantly challenged by any increase in costs. BHET would welcome an approach that recognises both the importance and the challenges in delivering the RBG strategic development locations. BHET encourage both prudence and rigour in setting rates, specifically with respect to Planning Practice Guidance requirements for strategic development locations to be assessed for viability on a site-by-site basis, reflecting their unique challenges and abnormal costs. The Viability Assessment highlights that, "the flexibility of the Royal Borough's affordable housing policy, which is subject to individual site viability assessments, ensures	the key data to be considered for the CIL viability evidence is that of new build homes given that the CIL charge relates to new development. In this context, the CIL rate increases, which reflect an increase to development costs of between 0.83% and 1.25% are reasonable and appropriate given the need to deliver vital infrastructure to support the developments coming forward in the Royal Borough. RBG notes that the PPG on Viability identifies that when testing the viability of plans, individual testing of every site or assurance that individual sites are viable is note required, and the use of typologies to determine viability is a reasonable approach. RBG's CIL viability evidence has been tested based on a set of typologies. RBG would reiterate that the advice on the CIL rate increases reflect a small uplift to development costs of the order of 0.83% to 1.25%. Further, BNPPRE has undertaken additional analysis of these increases in CIL costs, identifying that they reflect less than 1% affordable housing. RBG considers that this level of increase will not jeopardise the delivery of strategic sites in the Royal Borough and that the representations submitted do not provide suitable evidence to support their assertions that a cost increase of no more than 1.25% would result in BHET's not being able to deliver their proposed developments in the Borough.

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	that development comes forward in the Borough and consequently enables the Royal Borough to seek contributions towards infrastructure delivery as well as reasonable levels of affordable housing." This cannot apply where a Section 106 has already been signed and a minimum level of affordable housing has already been agreed. Development budgets have to be projected years in advance due to the length of time for design, planning determination and detailed design ahead of construction starting. The proposed increases in CIL would amount to a significant increase over and above BHET budgeted amount for proposed changes that are not supported by the evidence on values. BHET are concerned that substantial rises to the CIL chargeable rates are being proposed at a time when viability of all housing-led development is deeply challenging due to the current interest rate, regulatory and inflation environment. Transaction volumes and values have decreased whilst financing costs and construction costs have risen. Design changes as a result of changes to the fire regulations have delayed the majority of BHET planning applications and reserved matters for over a year, with associated consultant, financing and build costs.	With regard to the residual S106 allowances included in the viability assessment, RBG undertook analysis of the financial contributions secured through S106 agreements signed over the previous three years. This analysis indicated an average residual S106 requirement of circa £3,000 per unit for residential uses and circa £30 per square metre for commercial uses. These allowances are considered to be a reasonable assumption based on the average scheme allowance. RBG and BNPPRE note that actual amounts of S106 are of course subject to site-specific matters and negotiations when schemes are brought forward through the development management process and consequently are likely to vary, and this position is acknowledged in the viability study. The CIL Viability report was prepared using best available information in line with the requirements and best practice set out in the National Planning Practice Guidance for Viability and CIL. The Viability study adopts BCIS build costs data in the testing, which is advocated as an appropriate source of data by the PPG on Viability, over and above which BNPPRE have allowed for a generous external works cost of 15% as well as allowing for the additional policy extra over costs and a contingency allowance. BNPPRE have reviewed the residential values evidence in the area. In particular we note that the Berkely Homes Plumstead West Thamesmead scheme launched in June 2022 and as at December 2023 it is reported on the Molior Database that 103 units (circa 30%) have sold off plan, with the majority of buyers identified as being overseas investors. The current asking prices reported on the Molior data base range between £618 per

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	There is currently deep uncertainty around how quickly inflation will stabilise and for how long the Bank of England will maintain higher interest rates, with knock on effects on viability and deliverability of development. The sections that follow present more detail on our specific concerns regarding: • Adherence to Planning Practice Guidance on charge setting • Assumptions in the viability assessment regarding: a. costs b. values Planning Practice Guidance sets out how Local Authorities should go through the process of setting their proposed rates for the Community Infrastructure Levy in their 'Charging Schedule'. This expands on the statutory requirements set out in the Planning Act (2008), Localism Act (2011) and CIL Regulations (2010) as amended. As a starting point Charging Schedules should:	sq ft and £874 per sq ft with an average of £713 per sq ft. We note that these prices are significantly in excess of the closest new build scheme. The Gallions Reach Dock 28 scheme of 333 new homes to the north of the Berkeley Homes' Plumstead West Thamesmead scheme is currently under construction with 30 units having completed and the remainder to follow through to the end of 2025. We understand that the scheme is being marketed exclusively to UK buyers and it is recognised by the market that the pricing of the units in this scheme to date *"is significantly cheaper than nearby schemes"* (Molior London database). The asking prices reflect prices of between £435 per sq ft and £741 per sq ft (an average of £567 per sq f). RBG note that this scheme was consented through the London Plan's "fast track" route, i.e. the developer chose not to submit viability evidence as part of their planning application, reflecting that they were clearly confident with the viability and deliverability of the development. Construction is progressing and the development is coming forward at a lower sales value point, despite the potential for residential development to achieve significantly higher values in this location. The delivery of the Dock 28 scheme at this lower price point does not preclude the fact that another scheme in this location could come forward achieving a higher sales value point. RBG and BNPPRE understand that The Reach is a scheme delivered by Peabody comprising 66 residential units of which 100% of the units were delivered as affordable housing units (52 intermediate units and 14 affordable rental units). All of the units marketed and sold in 2022 were

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	“Be consistent with, and support the implementation of, up-to-date relevant plans.” (PPG Ref: 25-011-20190901). The Royal Greenwich Local Plan: Core Strategy with Detailed Policies was adopted in 2014. It is not therefore up to date however it does confirm all of BHET’s sites fall within Significant Housing Sites and Strategic Development Locations: Woolwich, Kidbrooke, Plumstead and Thamesmead. The London Plan (2021) is also a relevant plan for these purposes, and identifies Opportunity Areas, including Woolwich (indicatively 5,000 homes in the Plan Period, which would include the final two blocks of Royal Arsenal Riverside and Armourer’s Court) and Thamesmead and Abbey Wood (indicatively 8,000 homes, including PWT). Although not part of the ‘Relevant Plan’ there is also a Thamesmead and Abbey Wood Opportunity Area Planning Framework (2021) prepared jointly by the Mayor of London’s office (Greater London Authority, GLA), Transport for London (TfL), Royal Borough of Greenwich and London Borough of Bexley. This identifies a ‘transport enabled’ capacity of 15,500 homes and 8,000 new jobs.	shared ownership units, reflecting submarket values, which are not considered directly comparable evidence of full market sales values. It is also noted that this development is located outside the “green area” i.e. it remains within CIL Zone 2 and is not included in the new CIL Zone 1 in the revised DCS. Trinity Walk is redevelopment of the Connaught Estate. The first phase of redevelopment consisted of 332 units of which 199 were private units. RBG and BNPPRE understand that the scheme launched in October 2016 with the first completions on the site starting from August 2017. The Molior database identifies that the scheme sold out during Q2 2019 after having completed during Q3 2018 with the average sales values achieved being in line with that quoted by Cushman and Wakefield in 2020. This market evidence is now over four years old. RBG and BNPPRE note that this site is also located outside the “green area” i.e. it remains within CIL Zone 2 and is not included in the new CIL Zone 1 in the revised DCS. The “all other uses” rate at £25 per sq m is based on the concept that all development in the Brough requires infrastructure to support it, and hence RBG will seek contributions towards CIL from all development (subject to the limited exclusions, which are effectively infrastructure in their own right) in order to support the provision of this vital infrastructure to support the growth in the Borough. This approach is in line with that of the Mayor’s CIL charging schedule. At £25 per sq m, the CIL charge will account for less than 1% of development costs and as a consequence this will not impact on developers’ decision to bring forward development or prevent development from coming forward. Moreover, RBG notes that this strategic approach to securing contributions towards infrastructure

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	In setting its CIL charge an Authority should use appropriate available evidence involving a broad test of viability across the area. (PPG Ref: 25-020-20190901) However, where there are significant strategic sites which are important to delivery of the 'Relevant Plan' these should be dealt with separately. This can include setting differential rates for development including low or zero rates for sites with low viability (PPG Ref: 25-022-20230104). In particular: *Differential rates for geographic zones can be used across a charging authority's area. Authorities may wish to align zonal rates for strategic development sites. Viability guidance sets out the importance of considering the specific circumstances of strategic sites ('Why should strategic sites be assessed for viability in plan making?'). This includes the potential to undertake site specific viability assessments of sites that are critical to delivering the strategic priorities of the plan.* *Charging authorities may want to consider how zonal rates can ensure that the levy compliments plan policies for strategic sites. This may include setting specific rates for strategic sites that reflect the land value uplift their development creates. Low or zero rates may be appropriate where plan policies require significant contributions towards housing or infrastructure through*	has been adopted and implemented by numerous other London boroughs in their CIL charging schedules, and this has not prevented development from coming forward in their areas.

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	planning obligations and this is evidenced by an assessment of viability. (PPG Ref: 25-026-20190901) As set out in more detail below, BHET is concerned that there has been insufficient consideration of the specific circumstances of their remaining development phases in setting the charges. We are particularly concerned about the rezoning of Plumstead West Thamesmead. The Consultation for the Revised Draft Charging Schedule includes the schedule itself and a Viability Study Update. Proposed residential rates are based on two Zones. Zone 1 is non-contiguous and covers Greenwich Peninsula and Town Centre and Woolwich Town Centre. Zone 2 covers the rest of RBG. The Viability Study, which provides the Evidence Base for these rates, identifies the strategic development locations in RBG (paragraphs 2.58 to 2.64) including Woolwich and Thamesmead. Paragraph 2.64 specifically refers to the Thamesmead and Abbey Wood Opportunity Area and the focus on "unlocking the significant growth potential in Thamesmead town centre and waterfront area through a step-change in public transport provision."	

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	This is not however carried forward into the viability assessment itself and the summary of the requirements for assessment set out in paragraph 6.3 does not refer to strategic sites and how their specific costs or challenges are dealt with in the assessment as required by the PPG. Instead the assessment sets out sales values across broad value zones (Figure 4.3.1) and then applies generic assessments to these areas. It does not include any exceptional costs and Section 106 assumptions are de minimis. Developer profit assumptions are based on relatively high profit margins, particularly given the current position in the market. The sections that follow provide some specific examples and evidence to help demonstrate this position. We would be happy to work through these examples with RBG if helpful. The build costs in the BNP Viability Assessment represent a significant underestimation of build costs compared to BHET's own experience. As set out in the Viability Assessment for PWT, our costs average £4,395 per square metre with an additional 7% site wide/site specific abnormals, well above the modelled £2,100 - £2,900. This is driven by a combination of essential infrastructure, site complexity and build quality. Second stair cores have further added to costs; the estimated cost for this at the PWT is at least £1.5m per block. It is unclear if this has been reflected in the Viability Assessment.	

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The Section 106 per unit cost is an underestimate for strategic sites – under counting by an estimated £1,000 per home with our total S106 mitigation package being closer to £4,000 per home. Part of this is driven by off-site carbon mitigation. We note that the Viability Assessment includes a cost uplift for zero carbon but this only reflects on-site costs and not off-site obligations.
The tables below set out a comparison of key cost assumptions to PWT, clearly demonstrating that the assumptions in the viability assessment are a significant underestimate of the real-life position of BHET strategic sites.
<table>
<tr><th>Type of development</th><th>BCIS cost</th><th>Base cost
(£ per sq m)</th><th>External works</th><th>Total Cost (before policy costs)</th><th>BHE (Plu Thame</th></tr>
<tr><td>Houses (T1 and T4)</td><td>Estate housing - Generally</td><td>£1,828</td><td>15%</td><td>£2,102.20</td><td rowspan="3">£4, (averag cost) p site s abno</td></tr>
<tr><td>Flats – lower density (T2, T3 and T4)</td><td>Flats - Generally</td><td>£2,148</td><td>15%</td><td>£2,470.20</td></tr>
<tr><td>Flats – higher density (T5, T6 & BtR)</td><td>Flats - 6 or more storeys</td><td>£2,550</td><td>15%</td><td>£2,932.50</td></tr>
</table>
<table>
<tr><th>Variable</th><th>Cost</th><th>BHET (Plumstead Thames</th></tr>
<tr><td>S106</td><td>Resi: £3,000 per unit
Commercial: £30 per sqm</td><td>£4,000</td></tr>
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	The assessment does not adequately consider the position of large scale, strategic, development that has different characteristics from the typologies assessed in the viability study. Therefore the Council has not provided 'appropriate available evidence' that proposed CIL rates are appropriate for strategic sites or large scale multi-phased development with significant infrastructure or abnormal costs. The Draft Charging Schedule now also includes a £25 per square metre rate for "all other uses". As currently drafted, this would capture community facilities (apart from health and education), small scale retail and high street uses, small scale offices and leisure uses. In our developments, these uses are provided as part of the placemaking strategy to ensure local employment opportunities, quality of life for residents and ground floor activation. They are typically not viable in their own right and routinely require subsidy/rent free periods to attract and maintain tenants. These types of uses are not reflected in the Viability Assessment, which only considers offices, industrial and open storage. At Royal Arsenal Riverside non-residential space has been unoccupied for several years. Vacancy of non-residential uses and associated holding costs are also not considered, these can include significant business rates. Development that provide the	

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	opportunity for local employment should be encouraged rather than charged. BHET would like to raise a query with respect to the boundaries used on in the house price analysis that underpins the viability assessment (Figure 4.3.1 in the Viability Assessment). The proposed green boundary would change significantly to include PWT. This does not appear to be reflective of the market in that area – BHET would like further explanation of both the green boundary (i.e. the assumption that the PWT site is in the same broad valuation zone as that to the north adjacent to the River Thames) and the values assumed for that zone. The Viability Assessment indicates that values in the area are £720 per square foot. The source for this is indicated as Land Registry, Molior and submitted viability appraisals. However, these sources as they are available to us do not appear to us to support this valuation. The PWT site does not yet have any completed homes on it (and nor does the land immediately surrounding it) within the green area. So, BHET would question how the evidence points to this boundary being a reasonable basis for drawing a housing market area.	

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	 Reviewing Land Registry price paid data within 1km of the site in 2022 the average sales value is c.£544 per sqft for private blocks. Evidence provided to BHET by Cushman and Wakefield in 2020 estimated average values of £550 per sqft for the first phase, noting the context of the site. They sited comparable evidence from The Reach and Trinity walk at £512 and £573 per sqft, respectively. As such the designation of the site within the “green area” and its consequential rezoning to Zone 1 is not supported by the evidence. As of writing this report (September 2023) general UK values are currently down -5.3%1 on a year ago according to Nationwide, with the possibility that prices decrease further. Given that the actual course of 2023 is more challenging than in the projected “Downside” envisaged in the Viability Update Study (downside of -5% in 2023 following by stabilisation and growth in years	

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	to come), the outlook for price growth and cost inflation could be significantly more challenging than this worst case" scenario envisages. As set out by Nationwide's Chief Economist, last month (August 2023) "The softening [to -5.3%] is not surprising, given the extent of the rise in borrowing costs in recent months, which has resulted in activity in the housing market running well below pre-pandemic levels. For example, mortgage approvals have been around 20% below the 2019 average in recent months and mortgage application data suggests the weakness has been maintained more recently. Therefore the values for this area are already over estimated and there is a significant question over whether they will increase in line with even the "downside" scenario over the next 5 years. The Viability Assessment provided in support of the proposed rates is based on an underestimate of costs, and an over estimate of values for strategic, large scale complex sites with abnormal costs and significant Section 106 requirements. The rezoning of PWT from	

Representor	Key points of representation	Royal Borough of Greenwich response
	Zone 2 to Zone 1 is of particular concern, and is not supported by the valuation evidence. Given current market uncertainty and potential lack of forthcoming delivery, our recommendation is to either delay progression of this Charging Schedule until the position on the market trajectory is more clear, or consider taking into account further site specific evidence to ensure that development on these critical sites is still viable.	
Quod, on behalf of Thames Waterfront Joint Venture	Thamesmead Waterfront Joint Venture (the "JV") formed in 2019. The JV is a unique 50/50 partnership between Peabody – one of the UK's longest-established housing associations – and Lendlease, an industry leader in designing and building sustainable, innovative and thriving places. The partnership shares an aligned overarching vision and values, and a common focus on placemaking, long-term stewardship and socio-economic improvement. The JV will work collaboratively to lead the transformation and delivery of Thamesmead Waterfront over the long term. At around 100 hectares, Thamesmead Waterfront is a regionally significant development opportunity and the largest strategic site in the Royal Borough of Greenwich. It has the potential to make a significant contribution to meeting the Borough's housing needs and provide a	RBG recognises that Thamesmead Waterfront is a future strategic development area in the Royal Borough, with the long-term potential to deliver a significant amount of development and in particular new homes (previously identified as being a minimum of 11,500 new homes as published on Lendlease's website and now considered by the JV to be up to circa 15,000 new homes). The vision and masterplanning of the site is still at the very early stages of work, with the JV and their appointed masterplanning project team exploring the possible development options for the site to form a better understanding as to its potential and capacity. There is a significant amount of work still to be undertaken in relation to planning and policy formation for the area, and this will be an ongoing process, which will also feed into the Council's considerations for growth in their new Local Plan. RBG's new Local Plan (2021 to 2036) is also at the early stages of production. A Pre-Regulation 18 stage consultation was held between 11

Representor	Key points of representation	Royal Borough of Greenwich response
	wealth of wider regenerative benefits across the Borough. As you are aware, the JV has been working with a strategic masterplanning team to better understand the potential and capacity of the Thamesmead Waterfront site. This work has demonstrated that the site has the potential to deliver up to 15,000 new homes, a transformed town centre encompassing a mix of community facilities and retail, commercial and leisure uses, and enhanced green spaces and natural environment. The JV has responded to the current early stages of the consultation on the new Local Plan and will be responding to the proposed Call for Sites later in the year. In its recent response the JV noted the very significant infrastructure requirements that will be necessary to bring the site forward, including: social infrastructure, green and blue infrastructure, and investment in utilities and transport. This is in addition to a range of planning obligations, notably to provide affordable housing which is a priority for the JV and the Council. In this context, the JV's response went on to state:	July 2023 and 5 September 2023. This consultation sought to gather evidence on views of the current Local Plan and understanding as to how RBG's new policies could most effectively address key issues, such as climate change, the provision of affordable housing, the changing role of RBG's town centres, housing delivery, job creation and economic development. RBG are due to run a call for development sites for the new Local Plan in the coming months, inviting residents, businesses, community groups and developers to suggest development sites for consideration in the new Local Plan. Following this, RBG will prepare and consult on a Regulation 18 stage draft Local Plan. This consultation will seek feedback on the first draft of the new Local Plan. Regulation 19 stage consultation is anticipated in winter 2024/2025 with the Examination in Public of the new Local Plan scheduled for Summer 2025 and the adoption of the updated Local Plan in Winter 2025. The development of the Thamesmead Waterfront is dependent on the delivery of significantly improved public transport through a potential extension to the DLR and delivery of a bus transit scheme using dedicated infrastructure from Woolwich to Abbey Wood via Thamesmead. To this end, TfL identified that Government support is needed due to the size of the project and submitted a full Strategic Outline Case to Government for a contribution towards funding in mid-2022. Bolstered by a £1.3 million fund put together by Homes England, Greenwich Council, Newham Council and the Greater London Authority, TfL prepared an Outline Business Case, which it submitted to the Government in mid-2023, along with a request for a funding contribution to develop the scheme proposal into a powers and consents application. This funding, combined with significant contributions from TfL and local partners, will enable further design and assessment (covering areas such as engineering, station designs, environmental impacts, mitigation and

Representor	Key points of representation	Royal Borough of Greenwich response
	"It should also be noted that where infrastructure is (rightly) required on site, this can entail strategic sites having significantly higher development costs than are incurred by smaller incremental developments. It will be important to factor this into delivery considerations, and also in how the council applies its Community Infrastructure Levy to such sites." We set out below the requirements of the CIL regulations in relation to such strategic sites as part of the charge setting process, and note the current early stage in the Local Plan process. In this context, the JV would request that if the Council is minded to proceed with setting higher CIL rates through the current process, it commits to working with developers of strategic sites to understand the site specific viability challenges and deliverability requirements in the next stage of the Local Plan. This could include considering such costs 'cumulatively' and potentially reviewing the Charging Schedule for those sites to set zero rates, should that be the preferred approach. Planning Practice Guidance sets out how Local Authorities should go through the process of setting their proposed rates for the Community Infrastructure Levy in their 'Charging Schedule'. This expands on the statutory requirements set out in the Planning Act (2008), Localism Act (2011) and CIL Regulations (2010) as amended.	consultation, as well as funding and financing options) to be undertaken. Subject to Government confirmation of that initial funding contribution, TfL could complete this further work and be in a position to make an application for powers to build the DLR extension in 2026. Funding for construction is not yet in place and the full delivery of the scheme is currently uncertain. RBG understands that subject to agreeing a funding package, the earliest that construction could start would be 2028, with the scheme to open to customers in the early 2030s. In light of the fact that the Thamesmead Waterfront site is still at an early stage of masterplanning, and most importantly, that the site's development is reliant on the significant transport infrastructure improvements set out above, RBG considers that it is unlikely that the Site will be delivered in the current / next plan period. Lendlease's website on the development of Thamesmead Riverside identifies an expected completion date to be 2040+, whist the JV website for the development reflects that the "*Joint Venture was formally incorporated in October 2019, to masterplan and deliver Thamesmead Waterfront over the next 30 years*". As a consequence, RBG considers that the timescales for delivery of development are likely to be significantly long term that the development of the Thamesmead Waterfront site would in all reasonable probability fall outside the life of the proposed Charging Schedule. RBG note Quod's comments that the Thamesmead Waterfront site should be viability tested, however, given the very early stages of planning for the Thamesmead area, any viability testing at this stage

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	As a starting point, Charging Schedules should: *"be consistent with, and support the implementation of, up-to-date relevant plans."* (PPG Ref: 25-011-20190901). The Royal Greenwich Local Plan: Core Strategy with Detailed Policies was adopted in 2014. It is not therefore up to date. The London Plan (2021) is also a relevant plan for these purposes, and identifies Opportunity Areas, including Thamesmead and Abbey Wood with an indicative capacity of 8,000 homes and 4,000 jobs. Although not part of the 'Relevant Plan' there is also a Thamesmead and Abbey Wood Opportunity Area Planning Framework (2021) prepared jointly by the Mayor of London's office (Greater London Authority, GLA), Transport for London (TfL), Royal Borough of Greenwich and London Borough of Bexley. This identifies a 'transport enabled' capacity of 15,500 homes and 8,000 new jobs. The Council is now in the early stages of its review of its Local Plan (2021 to 2036) which it intends to adopt in 2025. This will include site allocations, including those	would be premature and hypothetical as the details of the development are yet to be set out in RBG's Policy. Quod have identified the range of infrastructure set out in the Thamesmead and Abbey Wood Opportunity Area Planning Framework ('OAPF') required to achieve the extended housing target. RBG notes that this infrastructure is not intended to be borne by the Thamesmead Waterfront site alone, rather it is set out to support the entire OAPF area. Moreover, much of the infrastructure is likely to be supported by CIL, and accordingly the Council could seek some of this infrastructure to be delivered through liabilities or CIL in Kind. RBG strongly opposes a delay to the introduction of the revised charging schedule. This would result in the loss of additional funding to deliver much needed infrastructure to support development in RBG, whilst not affecting the viability and deliverability of the Thamesmead Riverside site, as the scheme's development is not expected to commence under the lifespan of the revised Charging Schedule. Notwithstanding this, as identified in the April 2023 CIL Viability Report, a CIL charge as proposed at £96 per sq m would reflect a nominal cost to developments of between 1.8% and 2.6% of development costs with an average of 2.1%. Moreover, the CIL is not a completely new charge to developments, much of this cost is already embedded into both planning requirements and the land market, reflecting a small increase in costs to developments of circa 0.9%. A CIL liability of this level is unlikely to be the defining factor in a Site's delivery.

Representor	Key points of representation	Royal Borough of Greenwich response
	for the Thamesmead Waterfront site being brought forward by the JV. The Council is reviewing its adopted Charging Schedule in advance of sufficient detail being available from that Plan to take any detailed emerging policies, including site specific allocations, into account. In setting its CIL charge an Authority should use appropriate available evidence involving a broad test of viability across the area. (PPG Ref: 25-020-20190901) However, where there are significant strategic sites which are important to delivery of the 'Relevant Plan' these should be dealt with separately. This can include setting differential rates for development including low or zero rates for sites with low viability (PPG Ref: 25-022-20230104). In particular: *Differential rates for geographic zones can be used across a charging authority's area. Authorities may wish to align zonal rates for strategic development sites. Viability guidance sets out the importance of considering the specific circumstances of strategic sites ('Why should strategic sites be assessed for viability in plan making?'). This includes the potential to undertake site specific viability assessments of sites that are critical to delivering the strategic priorities of the plan.* *Charging authorities may want to consider how zonal rates can ensure that the levy compliments plan policies*	In light of this position, RBG considers that the CIL rates as proposed based on the updated viability evidence it has relied on is a reasonable basis for collecting CIL money to deliver much needed infrastructure and tis will not put development in the Borough at risk. Importantly, the funds raised via CIL will support vital enabling infrastructure for this project to move forward, particularly transport infrastructure. Paragraph: 018 Reference ID: 10-018-20190509 of the PPG on Viability identifies that, *"For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types."* The viability testing includes profit allowances of 17.5% on private residential development and 6% on affordable housing along with 15% on commercial uses. In both RBG and BNPPRE's experience these allowances are appropriate and in line with both the guidance in the PPG as well as normal market assumptions adopted in viability assessments of actual schemes coming forward in the Royal Borough and across London as well as and in CIL viability assessments. With respect to the inclusion of exceptional/abnormal costs, these are too variable and site and scheme specific to assess explicitly within an area wide viability assessment. RBG and BNPPRE note that the Examiner for Bristol's CIL Charging Schedule identified at paragraph 26 that, *"By definition, the CIL cannot make allowance for abnormal, site specific,*

Representor	Key points of representation	Royal Borough of Greenwich response
	for strategic sites. This may include setting specific rates for strategic sites that reflect the land value uplift their development creates. Low or zero rates may be appropriate where plan policies require significant contributions towards housing or infrastructure through planning obligations and this is evidenced by an assessment of viability. (PPG Ref: 25-026-20190901) The Consultation for the Revised Draft Charging Schedule includes the schedule itself and a Viability Study Update. Proposed residential rates are based on two Zones. Zone 1 is non-contiguous and covers Greenwich Peninsula and Town Centre and Woolwich Town Centre. Zone 2 covers the rest of the Borough. The Viability Study, which provides the Evidence Base for these proposed rates, identifies the strategic development locations in the Borough (paragraphs 2.58 to 2.64). Paragraph 2.64 specifically refers to the Thamesmead and Abbey Wood Opportunity Area, the OAPF capacity and need for investment in Docklands Light Railway. This is not however carried forward into the viability assessment itself and the summary of the requirements for assessment set out in paragraph 6.3 does not refer to the extracts from the Guidance referring to strategic	*costs. The rates have to be based on a generic analysis of a variety of size and type of schemes across the area, taking into account average local build costs, not the individual circumstances of particular sites. The fact that a few specific schemes that are already marginal may become unviable in certain locations should not have a significant impact on the delivery of new housing across the city to meet the requirements of the adopted CS."*

Representor	Key points of representation	Royal Borough of Greenwich response
	sites, which are set out above. Instead, the assessment sets out sales values across broad value zones (Figure 4.3.1) and then applies generic assessments to these areas. It does not include any exceptional costs and Section 106 assumptions are de minimis. Developer profit assumptions are based on relatively low profit margins, particularly given the current position in the market. None of the assessments make assumptions about large scale, strategic, multi-phased development with significant up front infrastructure costs as will be the case at Thamesmead Waterfront. The OAPF specifically identifies a range of infrastructure required to achieve the extended housing target including: • Transport Investment including interim solutions and then the extension of the Docklands Light Railway. • The creation of new town centres including social infrastructure. • The provision of creative and cultural uses. • Investment in heritage assets. • The provision of economic uses as part of mixed-use development which will have lower development values. • New and/or expanded education, health, and community facilities and play, sports, and recreation provision. • Emergency services.	

Representor	Key points of representation	Royal Borough of Greenwich response
	• Energy, environment, and utilities. Large scale development here will therefore have very different characteristics from the typologies assessed in the viability study, and therefore the Council has not provided 'appropriate available evidence' that proposed CIL rates are appropriate for this location. We recognise that it is currently difficult for the Council to make such assessments and that sufficient evidence is unlikely to be available until 2024, following the Council's call for sites and Regulation 18 draft Plan. It will be important for the Council to work with site promoters at that stage to ensure that the sites can meet the Local Plan soundness tests, particularly that of 'effectiveness': that it is deliverable over this period. In the view of the JV, given current market uncertainty, it would be sensible for the Council to delay further work on the Charging Schedule until this information is available. However, if the Council is minded to continue, it would be helpful if it were to commit to undertaking bespoke work in 2024 on the Thamesmead and Abbey Wood Opportunity Area – and any other areas which are strategic to plan delivery, to consider an appropriate approach. This would need to go beyond CIL to consider all obligations cumulatively and in a phased way, and it may then need to inform a review of the rates for the site if, for example, a zero CIL rate were to be set with infrastructure and other obligations secured through a	

Representor	Key points of representation	Royal Borough of Greenwich response
	delivery agreement. The JV would be happy to discuss how this could work.	
Collectiveplanning, on behalf of Sabreleague Ltd	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 Lyndean 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. As part of the pre-application planning process for Lyndean 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	Both the Council's adopted Local Plan and the London Plan recognise that there can be variance in viability between sites and as a result, in line with the NPPF their policies allow for sites to come forward through a viability tested route where a full policy compliant position cannot be supported. Affordable housing is a key policy requirement in the Royal Borough, however RBG recognises that it is essential to balance the need to deliver affordable housing with the need to secure contributions to fund community infrastructure that will support development and growth. Planning authorities cannot seek to prioritise securing affordable housing to the exclusion of securing other policy requirements including funding for infrastructure and vice versa. RBG consider that the proposed CIL rates in the updated CIL DCS strike this balance appropriately. The updated CIL charge in Zone 2 is identified as amounting to an average of circa 2.1% of development costs as a whole in Abbey Wood. However, this is not an entirely new cost and the proposed Zone 2 CIL Charge reflects a small increase in costs to developments of circa 0.9%. We would highlight that much of the Zone 2 area (i.e. that previously included in Zone 1) remains at the same CIL rate as the 2023 indexed Zone 1 charge and is in fact marginally lower than the 2024 indexed rate which is £102.97. The proposed updated Zone 1 charge is identified as amounting to a total average of circa 2.5% of development costs. As previously

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<tr><td></td><td>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:

<table><tr><th>Planning Reference</th><th>Site</th><th>No. Units</th><th>Affordable provision
(by unit)</th></tr></table></td><td>identified, this is not an entirely new cost to development, and the proposed Zone 1 CIL Charge reflects a small increase in costs to developments of circa 0.8%.

With respect to the increase in the proposed CIL charges relating to the area now in Zone 1 that was previously in Zone 2, this represents a small increase in costs to development of the order of 1.25%.

In addition, BNPPRE have undertaken further analysis of the increased CIL rates on development and have identified that the proposed uplift in CIL rates reflect less than 1% of affordable housing in schemes.

Set in this context, the increase in the residential CIL charges are unlikely to be the determining factor as to a site's viability and deliverability.

RBG and BNPPRE have undertaken further research into permitted schemes within the same area as that considered by Collectiveplanning and we set out the results of this research in a Table at Appendix D. A key issue we have identified is that the table presented by Collectiveplanning does not represent a holistic picture of the development in this part of the Royal Borough. Our research has identified that numerous schemes in the area have been consented with a full policy compliant level of affordable housing, or which have come through the London Plan "Fast Track" route, so RBG and BNPPRE consider that the picture presented by Collectiveplanning's table is a pessimistic and incomplete view.</td></tr>
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<tr><td>21/3231/F</td><td>Woolwich Central, Phases 3 and 4, land bound by Love Lane, Grand Depot Road, John Wilson Street, Thomas Street, Woolwich New Road, Woolwich</td><td>712</td><td>23%</td></tr>
<tr><td>22/1017/F</td><td>Land bound by Vincent Road, Wilmount Street and Woolwich New Road, Woolwich , SE18</td><td>482</td><td>30%</td></tr>
<tr><td>20/3444/MA</td><td>Morris Walk Estate (South), Pett Street, Woolwich, London, SE18 5PA</td><td>462</td><td>27%</td></tr>
<tr><td>20/1924/F
(Appeal Ref: APP/E5330/ W/21/3285177)</td><td>Land at Nos. 6, 61-81 and Coopers Yard, Eastmoor Street and Nos. 6 & 10 Westmoor</td><td>188</td><td>30%</td></tr>
</table>
</td><td>We note that the site adjacent to the Lyndean Industrial Estate, Land at Felixstowe Road, although granted permission in September 2018 for 245 residential units of which 10% were to be affordable housing, has been delivered with 61% affordable housing. In March 2023, 149 completed units were switched to affordable housing delivered as shared ownership.

RBG recognises that strategic affordable housing targets are met through a range of schemes delivering what they can at the point in time that they come forward against the Council’s Policy Target, along with Registered Providers delivering 100% affordable housing schemes.

BNPPRE have also undertaken further analysis of the impact of the proposed revised CIL charges, where possible, of a number of the schemes set out in the Table at Appendix D. This analysis considers the Borough CIL charge based on the adopted CIL charging schedule measured against the stated construction costs for these schemes as set out in the applicant’s submitted viability assessments supporting their panning applications. BNPPRE have also assessed the Borough CIL liability based on the revised CIL charging schedule against the construction costs, indexed to 2024 costs. As can be seen from the results in Appendix D, the adopted Borough CIL accounts for a cost of between 0.87% and 2.72% of development costs in the schemes considered. This compares to a CIL liability in the revised CIL DCS of between 0.82% and 3.96% of construction costs. This analysis demonstrates that the revised CIL DCS rates will result in a small increase in costs to schemes of the order of between 0.02% and 1.24% with some schemes reflecting no increase or a decrease in the percentage cost to schemes. In light of this, RBG and BNPPRE remain</td></tr>
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<tr><td></td><td>Street, Charlton, London, SE7 8LX</td><td></td><td></td></tr>
<tr><td>20/3385/F & 20/3386/L</td><td>Woolwich Exchange, Land Bounded by Plumstead Road, Burrage Road, Spray Street and Woolwich New Road, Woolwich, London, SE18 7BZ</td><td>801</td><td>20%</td></tr>
<tr><td>19/2498/F</td><td>Land bound by Beresford Street and Macbean Street, Woolwich , SE18 6BG</td><td>595</td><td>20%</td></tr>
<tr><td>16/2878/F</td><td>Land at Felixstowe Road, Felixstowe Road, Abbey Wood, SE2 9SG</td><td>245</td><td>9.8%</td></tr>
</table>

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
</td><td>of the opinion that the proposed revised CIL rates strike the appropriate balance of raising funds for necessary infrastructure, whilst not impacting on development viability and deliverability in the Borough.</td></tr>
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Representor	Key points of representation	Royal Borough of Greenwich response
	delivery affordable housing, that is a real priority for the Borough. We therefore request the current CIL level is kept without the increase.	
Mel, Resident in Woolwich	Dear Sirs I hope this message finds you well. I am writing to express my deep concerns and objections regarding the recently proposed “CIL” levy charges. In these trying times when people are struggling to make ends meet due to the escalating costs of living, the imposition of such levies on non-essential services appears to be unjust and burdensome. Firstly, it is essential to consider the economic challenges faced by residents within our community. The ongoing cost of living crisis has already placed a significant strain on households. At a time when every penny matters, imposing additional financial burdens on individuals and families for non-essential services seems counterproductive. I urge you to reconsider the necessity and impact of these new charges on the community's well-being. Secondly, I'd like to draw attention to the performance of the council, particularly concerning new developments. It has come to my attention that many promised projects, such as those in Woolwich, have been marked by slow progress and significant delays. It is disheartening to witness taxpayers' hard-earned money being directed towards initiatives that are not efficiently managed or executed. Before seeking additional funds from the community, I believe it is imperative for the council to	The Community Infrastructure Levy is not a charge made to residents. The CIL is a charge made on new development in the area, with the monies raised from this being used by the Council to deliver the essential infrastructure needed to support growth in Greenwich. CIL will not be used to fund housebuilding, but can be used on a variety of new infrastructure such as schools, healthcare facilities, transport improvements, and sport and leisure facilities. CIL is charged on the commencement of development, payable by the developer and is therefore not passed onto homeowners or residents occupying new homes. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Representor	Key points of representation	Royal Borough of Greenwich response
	address these concerns and demonstrate improved performance in ongoing and future projects. In conclusion, I respectfully request that you review the decision to implement these new levy charges, taking into account the financial hardships faced by residents and the need for improved transparency and efficiency in council operations. It is hoped that you will prioritize the well-being and financial stability of your constituents. Thank you for your attention to this matter.	

Table 2. Summary of representations made through Commonplace and proposed Council response.

Issue raised in representation	Council response
Agrees with the proposal.	The representation is noted. No technical response required.
Representation is an observation (therefore does not require a response)	The representation is noted. No technical response required.
Disagrees with the proposal but does not provide explanation.	The representation is noted. No technical response required.
Rate are too low in comparison to other boroughs, or should have been made sooner.	The setting of the Borough’s CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority’s area, and the setting of rates ‘must strike an appropriate balance between’ ‘the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council is under no obligation to review its Charging Schedule and the timing of the review has been made in considering a number of factors, including the evidence which must be considered when setting rates, such as the viability of development and the need to raise funds for infrastructure. Whilst the CIL rates were originally set in 2015, the rates are index-linked to inflation and an annual adjustment is made accordingly. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Issue raised in representation	Council response
Unsubstantiated assertion on increased rates (e.g. for particular use classes or areas)	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
Balance between viability and charging for infrastructure not appreciated.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
Rates are not consistent across use classes.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the

Issue raised in representation	Council response
	potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation
Concerns on how the monies collected through CIL are used.	The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
Impact on viability of development, impact on housebuilders / developers	As part of the evidence required for the proposed amendments to the charging schedule, the council is required to show why the proposed rates set a balance between the need to fund infrastructure and the potential implications for the viability of development across the Borough. The viability evidence used is based on an area-based approach, and involves a broad test of viability across different land uses across different parts of the Borough. The proposed amendments to the charging schedule are informed by and consistent with the evidence on economic viability across the Borough, this is to ensure that the rates set do not threaten the delivery of the Local Plan as a whole.

Issue raised in representation	Council response
	The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
Increased CIL charges mean owners of house/flats would need to pay more taxes	The Community Infrastructure Levy is not a charge made to house/flat owners and will not lead to any additional taxes for residents. The CIL is a charge made on new development in the area, with the monies raised from this being used by the Council to deliver the infrastructure needed to support new development in Greenwich. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
Developers will pass on the new fees to residents.	Whilst the Council cannot and is not responsible for setting the price at which developers sell (and vendors choose to buy) property, the Council considers it very unlikely that the CIL charge will be passed on to residents. The CIL rates are set in accordance with the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended), which state that the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). This is to ensure that new development is economically viable in the area. In addition, the CIL charge is generally only a relatively small proportion of the overall cost of development, compared to factors such as build costs and the price of land, with sales prices determined by the market as well as these costs, and so not directly linked to the CIL rates. In our judgement the Council therefore consider that these fees will not be passed on to residents, and the Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
CIL needs to be eliminated to promote more housing	The Council's current position is that CIL is regarded as an important way of funding the infrastructure that is required to support new development, and so is seeking to revise the current rates to ensure it can maximise the amount of money it can get from CIL to do this. In addition, the Council considers that CIL does not deter new housing from being built. The CIL rates are set in accordance with the 2008 Planning Act and Community Infrastructure Levy Regulations 2010

Issue raised in representation	Council response
	(as amended), which state that the setting of rates ‘must strike an appropriate balance between’ ‘the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). This is to ensure that new development is economically viable in the area. Therefore the Council. As the Council’s position is to retain CIL, it considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Table 3. Complete list of representations made through Commonplace and proposed Council response.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
001	Disagree	It is not clear in the proposal text if agreeing means that the owners of a flat/house should pay more (through the council tax bills) for amenities like playgrounds or GPs or schools.	The Community Infrastructure Levy is not a charge made to house/flat owners and will not lead to any additional taxes for residents. The CIL is a charge on new development in the area, with the monies raised from this being used by the Council to deliver the infrastructure needed to support new development in Greenwich. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
002	Agree	-	The representation is noted. No technical response required.
003	Disagree	The CIL charges in Greenwich have always been too low compared with comparable boroughs, and they will continue to be so under these proposals.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
004	Disagree	People are already struggling with the cost of living crisis, expanded ULEZ zones, increased parking charges and increased permit charges. People can not afford pay anymore and developments should be taken out of existing tax or existing council tax payments! How long before more residents in RBG have to go to food banks to survive! It's not fair to everyday people to pay more!	The Community Infrastructure Levy is not a charge made to house/flat owners and will not lead to any additional taxes for residents. The CIL is a charge made on new development in the area, with the monies raised from this being used by the Council to deliver the infrastructure needed to support new development in Greenwich. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
005	Disagree	I disagree with the proposed increases as I trust that increases should be higher. Greenwich has been one of the lower charging CIL schedules in London. The residential charging schedule for zone one could go higher to £200 to £250 persqm. Zone one has shrunk in this proposal, it's the prime locations in Greenwich with good transport links. The council has the chance to get developers to pay for more infrastructure that is desperately needed in Greenwich. Hotels, Warehouses, Hotels could all be charged e.g. £150persqm. I have lived in Greenwich for 19 years and more monies can be gained from developers for residents to have both basic and	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		improved facilities. New primary schools being built do not even have large enough school halls for the children to have assembly all together or suitable outdoor shading installed when built e.g. St Mary Magdalene Primary School Peninsula Site. There is no leisure centre or library on Greenwich Peninsula, limited GP surgeries, the few open spaces do not have enough funds to maintain them e.g. the Ecology Park and Southern Park, a vibrant area with a growing population needs more infrastructure investment. More funds, spent in the correct way would make Greenwich a much better place to live. CIL is a way the developers can contribute more to the borough. Other neighbouring and near by inner London boroughs have recently increased their zone one residential charge to £280 for Tower Hamlets, £435 for Southwark, £500 for Lambeth. Some neighbouring Inner and Outer London boroughs are still on their original residential schedules like Lewisham £100, Newham £80, Barking and Dagenham £70. Once they increase, Greenwich is likely to go back to the bottom of the London charging	rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule, infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		schedules. Please let this be Greenwich's chance to charge the right amount for future years.	
006	Disagree	the increases for the Residential CIL are more than welcome but still lag behind the other major London councils (for instance, Hammersmith, Camden, Tower Hamlets). Greenwich is growing at fast speed and more is required to keep up with its residential population and hence infrastructure. Schools, GPs, cleaning services and many other infrastructures of public interest would benefit the growth of the community (libraries, sport centres for instance); while the doubling of the residential levy is a step forward, it is still lower than other areas.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
007	Disagree	It should be higher. Eg £280 in tower hamlets. £150 is substantially low.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
008			*No representation provided.*
009	Agree	The cil money received recently has been much less than similar boroughs. There is a clear business case to increase the levy	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
010	Disagree	The proposed CIL increase should be higher than proposed here in accordance with other boroughs in the capital. Other	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		councils have increased their charges to: Southwark £435, Tower Hamlets £280, Lambeth £500	The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
011	Disagree	The price should be lot higher for the amount of flats per square mile and the amount of council tax collected	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
012	Agree	-	The representation is noted. No technical response required.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
013	Agree	I am only agreeing as I am worried that the motion could be rejected if too many of us disagree without explaining HOWEVER the increase requested should be higher in order to have a real impact on the neighbourhood	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
014	Disagree	The residential development charge should be higher than £150 persqm. This is not sufficient please increase it to something higher than that. £200 persqm seems good.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The rates cannot be set with regard to Council Tax nor the density of development. The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
015	Disagree	It's nowhere near high enough. The developers here on the Peninsula are making millions and millions. Also	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		Greenwich itself needs cleaning up. The streets are filthy, there's been continuing work carried out which makes pavements virtually impassable for people in wheelchairs/mobility scooters like myself. Dropped kerbs need to be properly dropped , not with big drops; it's very uncomfortable on mobility aids.	The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
016	Agree	Dev	The representation is noted. No technical response required.
017	Disagree	It should be higher	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
018	Agree	-	The representation is noted. No technical response required.
019	Agree	-	The representation is noted. No technical response required.
020	Disagree	-	The representation is noted. No technical response required.
021	Disagree	The charging schedule needs to be higher, more in line with other Councils (Southwark £435, Lambeth £500 etc).	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
022	Disagree	We need to demand developments pay more towards infrastructure.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
023	Disagree	I believe the charges should be higher. In Tower Hamlets (which is considered one of the poorer boroughs) the charge is almost double. In areas like Southwark it is almost three times the amount that Greenwich council are proposing.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
024	Disagree	I wish developers should be charged more to assist the village development	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The proposed rates are informed by and consistent with evidence on economic viability across the charging authority’s area, and the setting of rates ‘must strike an appropriate balance between’ ‘the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
025	Disagree	Believe that the charges should be higher in line with neighbouring councils	The setting of the Borough’s CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority’s area, and the setting of rates ‘must strike an appropriate balance between’ ‘the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
026	Disagree	I agree with increasing the rates but the proposed rates are too low.	The setting of the Borough’s CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
027	Disagree	-	The representation is noted. No technical response required.
028	Disagree	While we accept that due to the circumstances set out in the consultation there does need to be some increases to CIL in Greenwich, we believe the current proposals go too far and could have an impact on scheme viability/ pipeline developments and in turn the delivery of all tenures of housing in the borough, including much needed affordable housing. The proposed increase in charges is not consistent across Use Classes. For schemes with 10 or more units in zone 1 the increase will be 56% and in zone 2 the increase will be 75%; meanwhile there would be no increases for hotels, student accommodation or supermarkets. We also note that it would	As part of the evidence required for the proposed amendments to the charging schedule, the council is required to show why the proposed rates set a balance between the need to fund infrastructure and the potential implications for the viability of development across the Borough. The viability evidence used is based on an area-based approach, and involves a broad test of viability across different land uses across different parts of the Borough. The proposed amendments to the charging schedule are informed by and consistent with the evidence on economic viability across the Borough, this is to ensure that the rates set do not threaten the delivery of the Local Plan as a whole. The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). As part of the evidence for the proposed amendments to the charging schedule

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		not be comparable with the rates of neighbouring and comparable boroughs. For example for housing developments in Lewisham CIL in 2023 is between £137.07 and £95.95psm, Newham between £118.82 and £59.41 and Bexley between £82.56 and £55.04. Only Lewisham's prime zone would be above the lower range of £96psm propose for the zone 2 of Greenwich. Owing to the Borough's funding commitments to TfL for the Woolwich Crossrail Station, we are concerned that even if the proposed rates are adopted, much of this funding will be directed to Crossrail above oth er important infrastructure items on the Regulation 123 list.	infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. This has replaced Regulation 123 Lists. Crossrail will have been paid for by the time the Charging Schedule is adopted. Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
029	Agree	-	The representation is noted. No technical response required.
030		-	
031		I cannot comment on what I cannot find or read. There would be a lot more housing for residents of RBG if there was a ban on foreign ownership of housing in Greenwich. At the moment all this new	The recent CIL consultation is focused specifically on the proposed changes to the CIL rates, which are charged on new development with the money raised being used to deliver the infrastructure needed to support new development in the area. Whilst the Council understands residents' concerns regarding home ownership, it is not an issue that can be addressed through CIL.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		housing is marketed abroad, eg Malaysia, China, India, Hong Kong, etc. There are absentee landlords and flats left unoccupied. It is a racket, it is bad for local people desperate for housing, it should be illegal and must be stopped.	The consultation information was published and made available in line with the relevant Regulations, and included physical copies being made available in certain locations, as well as on the Council's website. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
032	Disagree	Summary of letter attached: Representation made by Collective Planning, on behalf of Sabreleague Ltd. As part of the pre-application planning process for Lyndean Industrial Estate, constrained viability has been one of the major issues for deliverability of the scheme. The scheme has limited ability to make a policy compliant level of affordable housing due to factors including high build costs, high existing use value of the site, high finance costs, and relatively low sales values. The proposed CIL rate increases in the Draft Charging Schedule would erode even further the potential quantum of affordable housing a scheme would deliver, and would rewult in lower or no affordable housing provision on major schemes in Abbey Wood and across the Borough.	The setting of the Borough’s CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority’s area, and the setting of rates ‘must strike an appropriate balance between’ ‘the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The CIL charge is generally only a relatively small proportion of the overall cost of development, compared to factors such as build costs and the price of land, with sales prices determined by the market as well as these costs, and so not directly linked to the CIL rates. CIL is also taken into consideration in price paid for land. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		Therefore, it is requested that the CIL rate is not increased for new residential development and other uses.	
033	Disagree	I am concerned that it will increase the cost of new houses and flats in the area, as the developer passes the cost on to the sale/rental price. we need more affordable housing in the Borough and I worry that these increases will be passed onto people trying to buy or rent.	The Council cannot and is not responsible for setting the price at which developers sell (and vendors choose to buy) property. In addition, the CIL charge is generally only a relatively small proportion of the overall cost of development, compared to factors such as build costs and the price of land, with sales prices determined by the market as well as these costs, and so not directly linked to the CIL rates. CIL is also taken into consideration in price paid for land. Affordable housing is exempt from CIL charges. The CIL rates are set in accordance with the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended), which state that the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). This is to ensure that new development is economically viable in the area. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
034	Agree	This should have been done years ago, I understand Greenwich had some of the lowest CIL charges in London. It is vital new development comes with sufficient money to pay for the necessary infrastructure to support it.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
035	Agree	I am not clear as to why the changes has not been made sooner. It would seem that developers have been getting an enhanced deal from RBG for far too long. This change to bring RBG in line with other boroughs is long overdue.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location. The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council is under no obligation to review its Charging Schedule and the timing of the review has been made in considering a number of factors, including the evidence which must be considered when setting rates, such as the viability of development and the need to raise funds for infrastructure. Whilst the CIL rates were originally set in 2015, the rates are index-linked to inflation and an annual adjustment is made accordingly.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
036	Disagree	-	The representation is noted. No technical response required.
037	Agree	-	The representation is noted. No technical response required.
038	Disagree	Developers will pass on the new fees to customers/residents, exacerbating the cost of living crisis. The council should support development, not impose new restrictions on it. The old CIL charges will still contribute quite a lot to the budget.	The Council is not responsible for setting the price at which developers sell (and vendors choose to buy) property. In addition, the CIL charge is generally only a relatively small proportion of the overall cost of development, compared to factors such as build costs and the price of land, with sales prices determined by the market as well as these costs, and so not directly linked to the CIL rates. CIL is also taken into consideration in price paid for land. The CIL rates are set in accordance with the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended), which state that the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). This is to ensure that new development is economically viable in the area. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
039	Agree	I believe it is a good source of funding for community projects.	The representation is noted. No technical response required.
040	Disagree	They are too low and there is not enough transparency about what actually happens to the money when received.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also publishes an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
041	Agree	-	The representation is noted. No technical response required.
042	Disagree	There is a severe shortage of housing This charge will further discourage new house building due to the additional expense	As part of the evidence required for the proposed amendments to the charging schedule, the council is required to show why the proposed rates set a balance between the need to fund infrastructure and the potential implications for the viability of development across the Borough. The viability evidence used is based on an area-based approach, and involves a broad test of viability across different land uses across different parts of the Borough. The proposed amendments to the charging schedule are informed by and consistent with the evidence on economic viability across the Borough, this is to ensure that the rates set do not threaten the delivery of the Local Plan as a whole.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
043	Disagree	I think the charges should be consistant with other London Boroughs. If they are lower to help attract developers into RBG we should not undervalue the boroug or its communities. This will only flood the area with cheap development. It feels liekt eher is more than enough development at the moment and pricipally aimed at attracting new middle class residents into the area and not service the existing communities	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
044	Disagree	-	The representation is noted. No technical response required.
045	Disagree	Too low, particularly given how well connected much of the borough is. Hotel and student rates should be much higher given appeal of area.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
046	Disagree	Every tax creates a disincentive in some way. By taxing development, you are taxing housing supply. By taxing housing supply, you are reducing housing supply, so you are causing hardship and pain to people who rent. Tax other things, like wealth, inheritance, sugar, tobacco, fuel, or road use.	CIL is an important and necessary mechanism of funding the infrastructure that is required to support new development and ensure it is sustainable. The Council is not responsible for setting the price at which developers sell (and vendors choose to buy) property. In addition, the CIL charge is generally only a relatively small proportion of the overall cost of development, compared to factors such as build costs and the price of land, with sales prices determined by the market as well as these costs, and so not directly linked to the CIL rates. CIL is also taken into consideration in price paid for land. The CIL rates are set in accordance with the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended), which state that the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). This is to ensure that new development is economically viable in the area. The viability evidence used is based on an area-based approach, and involves a broad test of viability across different land uses across different parts of the Borough. The proposed amendments to the charging schedule are informed by and consistent with the evidence on economic viability across the Borough, this is to ensure that the rates set do not threaten the delivery of the Local Plan as a whole. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
047		-	
048	Agree	RBG is a very desirable area for new development. This charge is a commensurate way to ensure that all of the community benefit from development projects.	The representation is noted. No technical response required.
049	Agree	There needs to be a better investment into council housing along with better infrastructure	The representation is noted. No technical response required.
050		-	*No representation provided.*
051	Disagree	-	The representation is noted. No technical response required.
052	Agree	Grenwich have fallen behind on costings for years.	The representation is noted. No technical response required.
053	Disagree	This is a tax on building plain and simple. It is also a an additional burden on builders and developers. Greenwich should eliminate the CIL altogether and encourage more houses to be built. That would result in lower prices and more housing for residents.	CIL is an important and necessary mechanism of funding the infrastructure that is required to support new development and ensure it is sustainable. In addition, the Council considers that CIL does not deter new housing from being built. The CIL rates are set in accordance with the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended), which state that the setting of rates ‘must strike an appropriate balance between’ ‘the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). This is to ensure that new development is economically viable in the area.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			As the Council's position is to retain CIL, it considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
054	Agree	RBG needs to recoup as much as possible, which it hasn't been doing to date	The representation is noted. No technical response required.
055	Disagree	Rates are too low when compared to other borough's in London; this is effectively taking up to levels they should have been at several years ago. It's clear from a lot of the built environment in the Borough (particularly around some of the new developments and the connections to the peninsula) would indicate that either not enough is being raised or it's being badly spent.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also publishes an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
056	Agree	-	The representation is noted. No technical response required.
057	Disagree	-	The representation is noted. No technical response required.
058	Agree	As a Resident of Woolwich (Woolwich New Road area) I would be keen to see increased local council revenue uplifted to continue to support respectful regeneration of the area. * Respectful here refers to the architectural and historic prevalence of the area and also that of native demographic / residents of the area.	The representation is noted. No technical response required.
059	Disagree	I think the levy should be higher. I suggest increasing it to £200+ in line with Lambeth, Lewisham and other boroughs. The profit made by developers and the construction industry in general from these projects is immense. The levy should also be linked to inflation or the consumer price index, otherwise it becomes devalued over time, necessitating repeat revision (which costs the council time and money to administer).	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
060	Disagree	-	The representation is noted. No technical response required.
061	Agree	If the independent consultant advice is being followed, then this feels like the best course of action	The representation is noted. No technical response required.
062	Disagree	Greenwich should be charging more	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
063	Agree	-	The representation is noted. No technical response required.
064	Disagree	The changes are not strong enough. Berkeley homes for example have failed to deliver commercial tenants in royal arsenal, have constantly looked to thwart planning permission regarding advertising stands etc and are failing to encourage biodiversity or protect the	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		green spaces. Insufficient funding has gone towards the increased traffic, gps, dentists etc.	economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
065	Agree	Makes sense to require new homes/facilities to contribute to maintaining and expanding necessary infrastructure.	The representation is noted. No technical response required.
066	Disagree	Speaking only about the Greenwich Millennium area, the amount of land available and the current plans to develop a considerable number of additional housing units demand for a higher charge than currently proposed. There will be a need to substantially increase green areas, adequate	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		pedestrian pavement, signalling, transportation links, cycleways, access to tube and train stations, better and cleaner links to central Greenwich, as well as ordinary infrastructure. The current proposed charge seems to be placing central Greenwich on the same level with the peninsula, which is in my view an unbalanced approach to the level of future infrastructure necessary.	infrastructure (CIL Regulation 14). The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
067	Disagree	Speaking only about the Greenwich Millennium area, the amount of land available and the current plans to develop a considerable number of additional housing units demand for a higher charge than currently proposed. There will be a need to substantially increase green areas, adequate pedestrian pavement, signalling, transportation links, cycleways, access to tube and train stations, better and cleaner links to central Greenwich, as well as ordinary infrastructure. The	*This representation is a duplicate of the representation above (Ref. 066).*

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		current proposed charge seems to be placing central Greenwich on the same level with the peninsula, which is in my view an unbalanced approach to the level of future infrastructure necessary.	
068	Disagree	Another rip off as usual, no reason for it the biggest Borough in London. Tourism brings in Millions. Council cut your waste, and then NO need to increase any thing. Just cut Council waste.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones rather than the matters raised in the representation. The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
069	Disagree	Too low compared to other boroughs	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
070	Disagree	-	The representation is noted. No technical response required.
071	Disagree	Greenwich Council, you have approved planning permission for a number of highrises when you shouldn't have. Obviously, you saw the increase in the number of council tax paid by the new units, a big cash injection to the budget you play and dilapidate and... you couldn't resist. Now because there are and will be too many dwellings more infrastructure is needed, hence money collected from the new dwellings council tax is not enough? And what you do? Tax and levy the Woolwich residents. Not much to expect from Civil Servants, you are and expensive admin to the taxpayers, always have been, always will be. Good for very little, not even a one trick pony. You really disgust me,	The Community Infrastructure Levy is not a charge made to house/flat owners and will not lead to any additional taxes for residents. The CIL is a charge made on new development in the area, with the monies raised from this being used by the Council to deliver the infrastructure needed to support new development in Greenwich. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		rest assured I will vote for the opposite party on the next elections, just for a similar good for nothing bunch to take over and screw it all once again.	
072	Agree	The Council needs to leverage our shared assets to raise funds for the community in Greenwich	The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
073	Agree	The Council needs to leverage our shared assets to raise funds for the community in Greenwich	*This representation is a duplicate of the representation above (Ref. 072).*
074	Agree	CIL desperately needs increasing to support local development and infrastructure, including active/sustainable travel and environmental improvements	The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule

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			infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
075	Agree	-	The representation is noted. No technical response required.
076	Disagree	Greenwich is a popular area with good (albeit declining) transport links and I think higher charges are supportable.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
077	Disagree	-	The representation is noted. No technical response required.
078	Disagree	The zoning does not capture the real value of land on the river and undercharges in zone 2. These properties once built sell for prices that	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		are far above average house prices due to their location on the river. Also the riverside lacks infrastructure in Charlton and West Thamesmead that CIL could help to fund.	authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
079	Disagree	The zoning does not capture the real value of land on the river and undercharges in zone 2. These properties once built sell for prices that are far above average house prices due to their location on the river. Also the riverside lacks infrastructure in Charlton and West Thamesmead that CIL could help to fund.	*This representation is a duplicate of the representation above (Ref. 068).*
080	Agree	-	The representation is noted. No technical response required.
081	Agree	-	The representation is noted. No technical response required.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
082	Disagree	These rates are far too low to make up for the years of undercharging you as a council are responsible for. No matter how many of you seem to move into roles with developers you cannot get away from the extreme lack of basic services from safe crossings to suitable pedestrian routes and community projects that should have been supported by this money over decades. This in negligence in the extreme.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
083	Agree	Makes sense to me that as Greenwich property values continue to rise, developers should be charged more in order to continue to reap that benefit, and those funds paid should benefit the community.	The representation is noted. No technical response required.
084	Disagree	Many charges are too low, and the area could be split into 3 CIL zones, not two.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		For example, both student accommodation and hotel rates are far below those of neighbouring boroughs.	Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. Also, whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation. "
085	Disagree	I believe the CIL charges should be higher across the board, and in particular those on hotels and student accommodation, and in particular in the areas within Greenwich with excellent access to public transport (Greenwich, North Greenwich, Lewisham, Woolwich etc). As a minimum our CIL charges should match those of newham and tower hamlets (very equivalent). Additional CIL funding (currently the lowest of equivalent councils) should	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		then be ringfenced for real capital infrastructure investment in transport and local area bettering and with ongoing support to that infrastructure in terms of repairing etc. it should not be used to support local job creation schemes and other activities ongoing revenue spending as has patently happened previously.	The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
086	Disagree	I believe the CIL charges should be higher across the board, and in particular those on hotels and student accommodation, and in particular in the areas within Greenwich with excellent access to public transport (Greenwich, North Greenwich, Lewisham, Woolwich etc). As a minimum our CIL charges should match those of newham and tower hamlets (very equivalent). Additional CIL funding (currently the lowest of equivalent councils) should then be ringfenced for real capital	*This representation is a duplicate of the representation above (Ref. 085).*

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		infrastructure investment in transport and local area bettering and with ongoing support to that infrastructure in terms of repairing etc. it should not be used to support local job creation schemes and other activities ongoing revenue spending as has patently happened previously.	
087	Disagree	I am writing to express my deep concern and disappointment regarding the recent proposal for the modest and unambitious uplift of the Community Infrastructure Levy (CiL) in the Royal Borough of Greenwich. As a resident in this community, I strongly urge the council to reconsider these proposed rates and set more ambitious levels that truly reflect the value of this borough. It is evident that Greenwich Council has fallen significantly behind other London authorities in terms of CiL income over the past decade. The failure to review rates since the adoption of CiL in 2015 and the subsequent shortfall in predicted income have had a considerable impact on the funding available for essential services and projects within our borough.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		This is particularly acute with the high residential growth rate within the borough over the past decade. This missed opportunity has not only affected the council's ability to invest in vital infrastructure but has also hindered the development of our community. While I appreciate that a recent report by BNP Paribas suggested changes to the rates, I find the proposed alterations to be inadequate, particularly but not limited to hotels and student accommodation. Comparisons with nearby boroughs, such as Newham and Tower Hamlets, clearly indicate that Greenwich is considering rates well below the average for similar developments. This approach does not align with the the current value our borough and its proximity to prime locations in London. I strongly urge the council to adopt varying rates for different zones, taking into account the prime areas within Greenwich that warrant higher contributions from developers. By doing	

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		so, we can ensure that our local services receive the necessary funding to thrive, similar to successful examples in other boroughs like Lambeth. Furthermore, it is vital to note that the lack of rate revisions for many years not only affects Greenwich but also puts us at a disadvantage compared to other comparable boroughs, such as Lewisham. Maximising the potential revenue from CiL is essential for funding essential services and projects that benefit the entire community. The potential benefits of a more ambitious CiL rate cannot be overstated. It can significantly contribute to funding of big and progressive plans that the council has outlined, which the borough rightly need and deserves. From various essential services, including tree planting, community centres, to infrastructure like transportation improvements, parks, healthcare, and education. As a resident who values the growth and development of our community, I believe we must seize this opportunity to invest in our borough's	

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		future. I understand that the proposed rates for residential levels are currently under consultation. I implore the council to seriously reconsider the proposed rates for hotels and student housing as well. Our borough's excellent transport links and strategic location present prime opportunities for development, and we should capitalise on these attributes to secure a more prosperous future for our community. In conclusion, I respectfully request the Royal Borough of Greenwich to set more ambitious CiL rates that genuinely reflect the value and potential of our borough. Let us learn from the mistakes of the past decade and ensure a brighter future for our community by investing in essential services and projects that will benefit us all for years to come.	
088	Agree	-	The representation is noted. No technical response required.
089	Disagree	The proposed increases in CIL charges are welcome but too modest. The proposed Zone 1 is too small and should be expanded to include other well	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended).

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		connected areas of the borough. Housing developers are making vast profits while communities in poorer areas have to bid (beg) for paltry improvements.	The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
090	Agree	-	The representation is noted. No technical response required.
091	Disagree	You are soon them too low so help me god	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
092	isagree	This seems to make provision of new housing less attractive while long terms assets that provide a significant return to developers such as student accommodation are treated more favourably.	As part of the evidence required for the proposed amendments to the charging schedule, the council is required to show why the proposed rates set a balance between the need to fund infrastructure and the potential implications for the viability of development across the Borough. The viability evidence used is based on an area-based approach, and involves a broad

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			test of viability across different land uses across different parts of the Borough. The proposed amendments to the charging schedule are informed by and consistent with the evidence on economic viability across the Borough, this is to ensure that the rates set do not threaten the delivery of the Local Plan as a whole. Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
093	Agree	Providing the col is going to be going to be spent toward community infrastructure the. I have no objection to a raise	The representation is noted. No technical response required.
094		-	*No representation provided.*
095	Disagree	Far too low compared to similar London boroughs. The cosy relationship between senior council staff , past and present , and developers may be completely innocent but gives opponents and cynics a stick to beat them with. Nick Raynsford , Chris Roberts , Danny Thorpe , Steven Brain off the top of my head as well as current leader Mr Okereke and his ex employers.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
096	Disagree	Far too low for the borough, amazing transport links new and old, areas such as abbey wood and Thamesmead seeing mass housing with no improvement to the local area because of these rates.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
097	Agree	I agree with the proposal to increase CIL charges, but do believe this is not going far enough. They should be greatly increased to match the level of equivalent boroughs in London such as Lambeth or Haringey.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
098	Agree	For gods sake raise them! You've been giving away development permissions for pennies. The poorer parts of the borough are crying out for development money, which you have spectacularly failed to collect at a suitable rate!	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council is under no obligation to review its Charging Schedule and the timing of the review has been made in considering a number of factors, including the evidence which must be considered when setting rates, such as the viability of development and the need to raise funds for infrastructure. Whilst the CIL rates were originally set in 2015, the rates are index-linked to inflation and an annual adjustment is made accordingly. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
099	Agree	These charges seem to be aimed at contributing to community projects.	The representation is noted. No technical response required.
100	Agree	These charges seem to be aimed at contributing to community projects.	The representation is noted. No technical response required.
101	Disagree	Proposed rate appear too low given vast recent transport changes and high	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		demand for housing, services and development. This is particularly true for retail, hotels and student accommodation in areas of the borough near the Elizabeth line in Woolwich plus the DLR/tube in North Greenwich and Greenwich. Why are they not being increased?	Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation. "
102	Agree	-	The representation is noted. No technical response required.
103	Agree	The borough needs to step up its infrastructure investment in light of all the new housing/commercial property projects	The representation is noted. No technical response required. The Council prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future.
104	Agree	Hopefully better services	The representation is noted. No technical response required.
105	Agree	-	The representation is noted. No technical response required.
106	Agree	I think it is imperative that we continue to invest in our local community infrastructure, especially if we are adding additional housing / strain on exisiting.	The representation is noted. No technical response required.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
107	Agree	-	The representation is noted. No technical response required.
108	Agree	-	The representation is noted. No technical response required.
109	Agree	-	The representation is noted. No technical response required.
110	Agree	-	The representation is noted. No technical response required.
111	Agree	-	The representation is noted. No technical response required.
112	Agree	Increasing the charges is long overdue. Building has had a massive impact on quality of life in East Greenwich and there appear to be few tangible benefits for the community.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
113	Disagree	More money is needed	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
114	Disagree	The rates are too low and the money is Not invested in any infrastructure	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation."
115	Agree	-	The representation is noted. No technical response required.
116	Agree	About fucking time. Well done missing the building cycle, muppets.	The representation is noted. No technical response required.
117	Agree	An uptick in CIL rates in Greenwich is long overdue, it's hard to calculate the amount of revenue from developers that we've already missed out on that could have been put towards public services. Glad to see Woolwich town centre is in Zone 1, although I feel Charlton Riverside will be due for development soon and therefore could be included in Zone 1 to maximise revenue for the borough.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. The Council is under no obligation to review its Charging Schedule and the timing of the review has been made in considering a number of factors, including the evidence which must be considered when setting rates, such as the viability of development and the need to raise funds for infrastructure. Whilst the CIL rates were originally set in 2015, the rates are index-linked to inflation and an annual adjustment is made accordingly.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
118	Agree	-	The representation is noted. No technical response required.
119	Agree	-	The representation is noted. No technical response required.
120		-	*No representation provided.*
121		-	*No representation provided.*
122		I agree in principle but do wonder if the money collected is used in the best way. Recently my GP surgery asked all registered patients if we would agree to them including 3 new areas within their 'catchment' so they could retain THE SAME NUMBER OF GP DOCTORS they already have. If we didn't agree they would lose 1 or 2 doctors!!! If your infrastructure levy works how can this happen??	As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The purpose of CIL is not to cover the total cost of all infrastructure. It is a top-up fund and it will be spread across multiple projects, which are set out in the Infrastructure Delivery Plan / Infrastructure Funding Statement. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation."
123	Agree	The levy was historically far too low, preventing RBG from investing in necessary infrastructure. With the large amount of Riverside development planned, one area that the increased levy should support is improving the Thames River path and	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		preserving what little nature there is there.	development, these must be justified by reference to the viability of development. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation."
124	Agree	-	The representation is noted. No technical response required.
125	Disagree	-	The representation is noted. No technical response required.
126	Disagree	They are still not high enough. More money is needed to provide infrastructure to support large residential developments.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
127	Disagree	They are still not high enough. More money is needed to provide infrastructure to support large residential developments.	*This representation is a duplicate of the representation above (Ref. 126).*
128	Disagree	-	The representation is noted. No technical response required.
129		-	*No representation provided.*
130	Agree	-	The representation is noted. No technical response required.
131	Disagree	I prefer a charge that increases as density of housing increases. High density/high rise housing is encouraged using a square meter calculation and puts more pressure on local facilities.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones; not to

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
			other aspects of planning policy such as guidance around density. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
132	Disagree	Greenwich has an unique location, is a world heritage site, has historical attractions, green spaces , transport and leisure infrastructure and a University, which opportunities which means that values of CIL should be much higher than proposed. Certainly much higher than all neighboring boroughs eg Lewisham, Newham, Bexley, Barking.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Therefore the CIL rates cannot be set by consideration of or comparisons with the CIL rates of other areas, each of which are set according to the evidence in their particular location and respond to market conditions at the time the review is undertaken. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
133	Disagree	-	The representation is noted. No technical response required.
134	Agree	The increase for residential/supermarkets/hotel is not large enough. We need to increase the charges to fund public transport and connections between transport hubs. I live in Greenwich and none of the buses go where I need to go: Canary Wharf and	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		the City. Unfortunately it's much cheaper and, depending on route, faster to drive than to take the train. Greenwich to London Bridge return £6!!! Two people £12!	economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). Whilst differential rates can be set across geographical zones or types of development, these must be justified by reference to the viability of development. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
135	Agree	-	The representation is noted. No technical response required.
136	Agree	-	The representation is noted. No technical response required.
137	Agree	-	The representation is noted. No technical response required.
138	Disagree	If you use it you should pay and if not the don't... Ie why when a family of 4 are struggling and don't use public transportation, bikes pay for them and the same for a Pensioner who doesn't use , public t, museum, schools, cycles, pay Parkes have to put up with bad roads because 90% of there tax goes else where... If you use it pay, if	The Community Infrastructure Levy is not a charge made to residents for the use of infrastructure. CIL is a charge made on new development in the area, with the monies raised from this being used by the Council to deliver the infrastructure needed to support new development in Greenwich, this includes public transport, open spaces, leisure facilities and other types of infrastructure. The funding for the delivery of infrastructure is a separate issue than the cost of infrastructure at the point of use (eg. bus fares or charges to use leisure facilities), and is not an issue being consulted on as part of the process to revise the CIL Charging Schedule.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		you have a child and cycle and use the park and the bus and train and the pool and the museum and car then you pay for them because you use them and not subsidized by everyone else	The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
139	Agree	I very strongly agree because when the developers build flats, they need to build communities, not just the properties. They should be responsible for making sure that the people that they sell the properties to have all the necessary services around them.	The representation is noted. No technical response required.
140	Agree	The entire Greenwich borough is becoming an utter shithole and it's getting worse by the day. The council seems to be completely unable to collect money for infrastructure needs. Roads, pavements, street cleaning and traffic management is now on par with a developing third world country, so it's just about time someone starts paying for this, since the council is simply incapable of raising council tax for political reasons.	The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
141	Agree	We need to get the deal for residents of the Royal Borough of Greenwuch. So the	The recent consultation on the proposed amendments to the CIL Charging Schedule, and subsequent Examination prior to adoption; specifically relates to the setting of the CIL

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
		Borough can see improvements to public realm, public transport including bus services, GP Surgeries, Health Centres and amenities for the Borough. Including leisure facilities etc..	rates, the uses they apply to, and any amendments to the CIL charging zones. As part of the evidence for the proposed amendments to the charging schedule infrastructure planning evidence has been submitted, which sets out the projects or types of projects that the Council intends to fund wholly or in part by CIL receipts. The Council also prepares an Infrastructure Funding Statement on an annual basis within which provides details of how CIL and other forms of developer contributions have been spent on infrastructure, alongside a list of priority types of infrastructure on which it intends to use CIL for in the future. The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
142	Disagree	I feel the proposed charges are still too low to ensure that vital community infrastructure is delivered.	The setting of the Borough's CIL rates has to be made in compliance with the relevant legal and regulatory framework, specifically as set out in the 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended). The proposed rates are informed by and consistent with evidence on economic viability across the charging authority's area, and the setting of rates 'must strike an appropriate balance between' 'the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area, and the need to raise funds for infrastructure (CIL Regulation 14). The Council therefore considers that no modifications to the Draft Charging Schedule are required as a result of the issues raised in this representation.
143	Agree	-	The representation is noted. No technical response required.
144	Agree	-	The representation is noted. No technical response required.
145	Agree	-	The representation is noted. No technical response required.

Ref	Agrees/ Disagrees	Explanation (as received*)	RBG response
146		-	*No representation provided.*
147	Agree	-	The representation is noted. No technical response required.
148	Disagree	-	The representation is noted. No technical response required.
149	Disagree	-	The representation is noted. No technical response required.

* With the exception of representation Ref 032, the text in the Explanation column textually reflects the comments received through Commonplace.

Appendix A – Updated BtR Appraisal Results

Appendix B – Existing use value comparable evidence

Appendix C – Example Typology Appraisals

Appendix D – Table of Permitted Developments

Date of consent	Planning Reference	Site	No. Units	Affordable Housing Provision (by Unit)	Adopted indexed CIL as % of Costs	Proposed CIL as % of Costs	Royal Borough of Greenwich Comment
17-Mar-23	22/3782/MA & 19/4398/O	Lombard Square - Parent Consent	Now 1,913 was previously 1,750	40%	-	-	Additional scheme not included in Colectiveplanning's representation.
22-Dec-22	22/1017/F	Land bound by Vincent Road, Wilmount Street and Woolwich New Road, Woolwich, SE18	482	30% net units but 35% AH overall	1.84%	1.72%	The agreed level of AH agreed was 35%, however, accounting for a loss of 24 affordable units brings the AH position to 30% in the application. Joint application with Hill and RBG - Town centre site with new leisure centre. 482 units with 168 affordable
24-Feb-22	21/2040/F	Dock 28 (Gallions View Nursing Home), 20 Pier Way, SE28 0FH	333	3%	-	-	Additional scheme not included in Colectiveplanning's representation.
17-Nov-23	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%	0.87%	-1.45	Mixed use scheme

Date of consent	Planning Reference	Site	No. Units	Affordable Housing Provision (by Unit)	Adopted indexed CIL as % of Costs	Proposed CIL as % of Costs	Royal Borough of Greenwich Comment
28-Apr-22	21/0585/F	Plumstead Centre, 95 Plumstead Road, SE18 7DQ	294	50%	-	-	Additional scheme not included in Colectiveplanning's representation.
16.05/22	20/3444/MA	Morris Walk Estate (South), Pett Street, Woolwich, London, SE18 5PA	462	27%	-	-	Estate regeneration
20/05/2022	20/3445/R	Morris Walk Estate (North) - Trinity Park North - North of Pett Street Maryon Road	304	42%	-	-	Additional scheme not included in Colectiveplanning's representation. Estate regeneration
	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%	1.45%	1.45%	
23.12.21	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~~ 777	20%	1.22%	1.23%	There are 777 new units and 24 existing units, so the number of units should be changed to 777.

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	~~19/2498/F~~	~~Land bound by Beresford Street and Macbean Street, Woolwich, SE18 6BG~~	~~595~~	~~20%~~	-	-	This application was refused so should not be included in this assessment.
09-Nov-20	19/1081/F	90 Abbey Wood Road SE2 9NN	30	20%	1.23%	2.17%	Additional scheme not included in Colectiveplanning's representation. Former Post Office
21-May-20	17/4080/F	1A + 1C Eynsham Drive, Abbey Wood, SE2 9RD	272	35%	-	-	Additional scheme not included in Colectiveplanning's representation. Close to Lyndean Industrial Estate
27-Sep-18	16/2878/F	Land at Felixstowe Road, Felixstowe Road, Abbey Wood, SE2 9SG (also known as Cross Quarter - Plot 3 - Abbey Place)	245	10% consented but delivered as 61% affordable housing	1.58%	2.58%	We understand that this scheme has been delivered as follows: • 72 open market rented units (which let within a month and a half from the point where the first units were launched); and • 149 units completed in March 2023 and have been switched to affordable housing units delivered as

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							shared ownership reflecting circa 61% AH. Site Adjacent to Lyndean Industrial Estate
09-May-17	16/2163/F	The Reach, Battery Road, SE28 0JS	66	100%	-	-	Additional scheme not included in Colectiveplanning's representation.
31-Mar-23	22/1116/F	Brookhill Close, Greenwich, SE18 6TX	254	49%	1.15%	1.06%	Additional scheme not included in Colectiveplanning's representation. Hyde Housing Group
28-Feb-23	21/3944/F 23/1227/I106	141-143 Woowich Road, SE10 0RJ	58	21%	2.28%	TBC2.83%	Additional scheme not included in Colectiveplanning's representation.
24-Aug-23	21/4511/F	Former Eltham Vicarage, SE9 6HB	49	100%	-	-	Additional scheme not included in Colectiveplanning's representation.
06-May-22	20/2186/F	Evelyn House 5-31 Eastmoor Street, SE7 8LX	67	100%	-	-	Additional scheme not included in Colectiveplanning's representation.

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22-Jun-22	20/3843/F	20 Orangery Lane, SE9 1HN	40	100%	-	-	Additional scheme not included in Colectiveplanning's representation.
25-Oct-23	22/4235/MA	Former Thomas Tallis School, Kidbrooke Park Road, SE3 9PX	330	100%	-	-	Additional scheme not included in Colectiveplanning's representation.
15-Aug-19	17/0897/R	Trinity Walk, Connaught Estate Phases 2/3, Woolwich New Road, SE18 6UU	352	30%	-	-	Additional scheme not included in Colectiveplanning's representation. Estate regeneration
23-Dec-20	18/4530/F	Ravensbourne Wharf, Norman Road, SE10 9QF	129	20%	2.72%	3.96%	Additional scheme not included in Colectiveplanning's representation.
19-Dec-19	19/0512/F	87 Blackwall Lane, SE10 0AP	27	37%	-	-	Additional scheme not included in Colectiveplanning's representation.
16-Dec-22	19/3456/F	Charlton Riverside - Herringham Quarter, Herringham Road and New Lyndenberg Street, SE7 8NJ	1,212	40%	2.15%	2.01%	Additional scheme not included in Colectiveplanning's representation.

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15-Jul-21	20/2067/F	71-79 Sandy Hill Road, Rear of 3 Burrage Place, SE18 7BQ	34	9%	0.87%	0.82%	Additional scheme not included in Colectiveplanning's representation.
03-Sep-21	19/2405/F	Junction of Burrage Road & Vincent Road, SE18 6RF	46	100%	-	-	Additional scheme not included in Colectiveplanning's representation.
16-Dec-21	20/1967/F	Land at the Heights, SE7 8JJ	48	100%	-	-	Additional scheme not included in Colectiveplanning's representation.
04-May-18	17/3338/F	Teulon House, 64-68 Blackheath Road, SE10 8DA	24	17%	-	-	Additional scheme not included in Colectiveplanning's representation.
27-Mar-18	17/1795/F	Synergy, 40 Victoria Way, Greenwich, SE7 7QS	330	35%	-	-	Additional scheme not included in Colectiveplanning's representation.
29-Jul-20	19/1409/F	London Square, 31 Royal Hill, Greenwich	59	22%	-	-	Additional scheme not included in Colectiveplanning's representation.
19-Sep-16	16/0132/F	Valley House, 445 Woolwich Road, Greenwich, SE7 7AP	73	15%	-	-	Additional scheme not included in Colectiveplanning's representation.

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11-Mar-19	16/2783/F	Valegro Apartments (Norman House), 110-114 Norman Road, SE10 9EH	63	21%	2.01%	2.92%	Additional scheme not included in Colectiveplanning’s representation.
31-Mar-16	15/3555/F	1 Sunbury Street, Greenwich, SE18 5NA	48	35%	-	-	Additional scheme not included in Colectiveplanning’s representation.
27-Apr-17	15/3295/F	Wellington Quarter (James House)	116	30%	-	-	Additional scheme not included in Colectiveplanning’s representation.
26-May-16	14/3551/F	Waterford Place 134 Averley Hill Road, SE9 2UG	135	32%	-	-	Additional scheme not included in Colectiveplanning’s representation.
26-Oct-20	18/1594/F	Saxon Wharf 46-48 Norman Road, SE10 9QX	145	48%	-	-	Additional scheme not included in Colectiveplanning’s representation.
27-Jun-22	20/1730/0	Morden Wharf Road, Tunnel Avenue, SE10 0NU	1,500	31%	2.46%	3.65%	Additional scheme not included in Colectiveplanning’s representation.
07-Mar-07	16/1792/F	Maritime (Booker Cash & Carry) 33-39 Greenwich High Road, SE10 8LR	125	35%	-	-	Additional scheme not included in Colectiveplanning’s representation.

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06-Nov-19	19/1110/MA	Battalion Court 36-38 Artillery Place, SE18 4AB	65	38%	-	-	Additional scheme not included in Colectiveplanning's representation.