London Borough Barnet Community Infrastructure Levy (CIL) –Draft Charging Schedule

Representations submitted by St William Homes
March 2021

St William Homes LLP ('St William') is pleased to provide representations in response to the London Borough Barnet (LBB) draft Community Infrastructure Levy (CIL) Charging Schedule 2021.

Established in 2014, St William is a joint venture between the Berkeley Group and National Grid and was formed to transform redundant gasworks sites in to new places for people to live, work and spend time. The partnership combines National Grid's extensive portfolio of surplus brownfield sites across London and the South East with the Berkeley Group's expertise and proven track record of homes delivery to create high-quality residential and mixed use developments. The JV has the potential to deliver over 20,000 new homes.

St William have an interest in the former gas works located to the north of Albert Road, New Barnet. The site is occupied by a decommissioned gasholder, Pressure Reduction Station (PRS) and a number of redundant buildings associated with the former use. The Site forms part of a key opportunity site identified as the Former East Barnet Gas Works and surrounding land in the New Barnet Town Centre Framework (2010).

St William is very keen to work positively with the Council so that this site can be bought forward within the short to mid-term and contribute to Barnet's 5 year housing supply whilst providing needed regeneration of a former gas works site. With this in mind, we would like to work in partnership with the council throughout the charge setting processes, to ensure that development in the Borough is viable, deliverable and contributes to the growth envisaged by the Council.

Former Gasworks sites are unique in both use and character; they are challenging and abnormally expensive to regenerate compared to delivery of development on other brownfield sites; they can also have ongoing operational requirements requiring physical infrastructure and easements which can considerably reduce the developable site area. The further challenge for any developer on these typically complex sites is the quantum of upfront costs required to make the sites adequate for residential delivery. The specific viability challenges to bring former utility sites forward needs to be carefully balanced to ensure these redundant brownfield sites fulfil their potential and contribute to an areas housing need.

In addition to the challenges faced and abnormal costs associated with the development and regeneration of former gasworks sites, they can also have ongoing operational requirements requiring physical infrastructure and easements which can considerably reduce the developable site area. The further challenge for any developer on these typically complex sites is the quantum of upfront costs and amount of developer risk required to make the sites adequate for residential delivery.

Given the sites unique characteristics of being a former gasworks, it will be crucial for the proposed CIL charges to strike the appropriate balance for such sites, between the need for infrastructure and the viability of development as required by the CIL Guidance which states that:

"Charging authorities should set a rate which does not threaten the ability to develop viably the sites and scale of development identified in the relevant Plan (the Local Plan in England, Local Development Plan in Wales, and the London Plan in London)."



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In considering the viability of these sites Councils need to ensure that all development costs are taken into account in accordance with CIL Guidance:

"A charging authority should take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or brownfield land. A realistic understanding of costs is essential to the proper assessment of viability in an area.

The Guidance also requires Councils to consider those sites (such as brownfield sites) where the impact of the levy is likely to be most significant when setting CIL rates. St William note that current assessments made, omit any allowance for exceptional or abnormal costs which raises a concern.

We would like to highlight to the Council that given this, former utility sites, including gasholder sites will need to be considered further as the CIL is taken forward; separate discussion on this would be beneficial.

St William trust that their comments will be duly considered and would like to work in partnership with the Council as the draft schedule is taken forward to adoption. With this in mind, we would like to be notified of further updates to the revised CIL draft charging schedule and reserve the right to be heard and attend at the Examination in Public.

