



GERALDEVE

Lambeth CIL team
PO Box 734
Winchester
SO23 5DG

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldeve.com

Via Email only - cil@lambeth.gov.uk

13 March 2020

Our ref: STH/CHMC/U0008043

Dear Sir / Madam

Lambeth's Community Infrastructure Levy (CIL) Draft Charging Schedule

We write on behalf of Stanhope PLC to make representations to the draft CIL Charging Schedule published on 31 January 2020.

In terms of the proposed CIL charging schedule there is a sum set out for all office class B1 uses.

There is no exemption however for affordable workspace in the way that affordable housing provision benefits.

We would like to highlight a potential issue in terms of existing offices that are to be demolished and replaced with a new office building. For example, where an existing office is demolished and rebuilt, a developer is required to provide affordable workspace on gross floorspace and not uplift, pay CIL on all the office floorspace and be zero carbon.

These elements have significant costs, and when weighed against retaining and refurbishing the office building, the costs versus value gained may not weigh in favour of the new build route.

There will then be a situation where there will be lots of older office buildings being retained that are not as sustainable, efficient, not as high quality and where site density has not necessarily been optimised. Furthermore, the benefits derived from CIL and delivery of affordable workspace will be lost.

Given that there are significant benefits associated with the provision of affordable workspace in terms of supporting start-up businesses within London and also upskilling, it is considered that affordable workspace should have a NIL CIL rate and this should be clarified in the draft CIL charging schedule or alternatively, affordable workspace should be sought on uplift only and this point is made in Stanhope's representations to the Draft Local Plan also.

Conclusion

We would be grateful if these comments can be taken into account as part of the consultation process and look forward to being kept informed of the next steps in terms of the emerging Local Plan.

We look forward to acknowledgement of receipt of these representations. Should you wish to discuss these representations further please contact Stephenie Thourgood or Charlotte McManus of this office.

Yours faithfully

Gerald Eve LLP

Gerald Eve LLP