

St William Homes LLP ('St William') is pleased to provide representations in response to the Worthing Borough Council draft Community Infrastructure Levy (CIL) Charging Schedule in accordance with the Community Infrastructure Levy Regulations (2010) (as amended).

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 design expertise and proven track record of delivery to create high-quality residential and mixed use developments. The JV has the potential to deliver over 20,000 new homes.

Former gasworks sites are technically complex and require significant investment and time to prepare them to be released for redevelopment when compared to other brownfield sites. A key benefit of the JV is that it enables housing to be delivered earlier as St William is able to progress planning while National Grid undertake infrastructure rationalisation, remediation and pre-development works.

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.

St William has an interest in the former National Grid site located at Lyndhurst Road, Worthing. The site is 2.8 acres in size and is very accessible, located within the Town Centre boundary of the Worthing Core Strategy (2011) and is circa 950m to Mainline train station. The Site is allocated for residential development within the adopted Worthing Core Strategy (2011) and this allocation was taken forward in Worthing's draft Local Plan 'Preferred Options' document (2018) where the site is allocated for a residential led scheme.

Generally when considering CIL rates, site viability, policy requirements and other planning benefits, the costs and risks associated with the redevelopment of a former Gasworks need to be considered carefully and weighed into the 'planning balance'.

Where such viability challenges are faced, it is essential that developers and Local Authorities work together to ensure that these sites, often located in central locations are regenerated and used in the most efficient manner to deliver needed housing.

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 Worthing Borough Council's 5 year housing supply whilst providing needed regeneration of a centrally located 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.

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

Representations submitted by St William Homes
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“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).” (25-008-20140612)

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. (25-020-20140612)”

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.

With this in mind, whilst St William generally supports the proposed CIL fee of £25 per sqm for flatted residential development as it is a decrease from the current adopted CIL rate; however, there are remaining concerns with the sites overall viability challenges and we wish to highlight that a balance will need to be struck at the application stage between CIL, planning benefits and other policy requirements to help minimise the impact upon development viability so that the site can be bought forward. On this basis, St William welcome further discussion with the Council.

St William trust that their comments will be duly considered as the Charging Schedule is progressed 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.