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25<sup>th</sup> September 2023

Our Ref – 22/208

BY EMAIL: [bankssolutionsuk@gmail.com](mailto:bankssolutionsuk@gmail.com)

Dear Sir / Madam,

**OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION | COMMUNITY  
INFRASTRUCTURE LEVY CONSULTATION | SEPTEMBER 2023**

**REPRESENTATIONS ON BEHALF OF GLP**

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On behalf of our client, GLP, we are writing in response to your recent invitation for comments on OPDC's Draft Community Infrastructure Levy (CIL) Charging Schedule ahead of independent Examination.

GLP acknowledge that the Draft CIL Schedule sets out how a Community Infrastructure Levy charge would be applied to forthcoming developments in the OPDC area. It is also understood that any Planning Obligations guidance would need to be revised following the adoption of a CIL Charging Schedule to remove any planning contributions that would be superseded by CIL payments. Following the submission of representations to OPDC's consultation on the Draft CIL Charging Schedule in January 2023, GLP welcome the opportunity to comment on the Examination documents and Examiner's Queries.

Overall, GLP's initial representations concluded that the proposed CIL charge for industrial and warehouse developments would ultimately prejudice landowners and developers from bringing forward industrial intensification schemes and as such, would contradict the strategic and local level ambitions for industrial intensification in Park Royal SIL. Specifically, Urbā's review of BNP's viability evidence base document, which was included within GLP's representations, found that BNP's assessment for an industrial and warehousing CIL charge of £35/ sqm was not supported by their evidence and a zero rate would be more appropriate. Ultimately, it concluded that BNP's assessment was flawed on the grounds that they overstated their assumptions, and more significantly did not follow their evidence when setting the CIL charge, which is against the PPG on CIL.

GLP acknowledge that BNP have since provided updated evidence with regards to the review of the CIL Viability Study which would result in the CIL charge forming a slightly higher proportion of total build cost, from the previous 0.9% to 1%. However, they note that in spite of this, the £35/sqm charge for Industrial schemes remains unchanged.

Furthermore, GLP note that only the following additional text has been included to provide background as to why a CIL charge for industrial/warehouse uses is proposed to be introduced:

*Given the area is one of the most important premier industrial locations in London, with continued strong demand for industrial and logistics provision, which in turn will require infrastructure to support this.*

As this appears to be the only update with regards to reasoning provided, it is clear that this in itself is not strong enough to serve as sound, evidenced justification.

As such, following a review of the Documents submitted for Independent Examination, GLP maintain their previous position regarding the Draft CIL Charging Schedule, and would welcome amendments to the CIL Charging Schedule to remove the £35 per sqm rate for industrial and introduce a zero rate.

We trust that the above representations will be considered as part of the drafting of the CIL Charging Schedule. Should you have any questions concerning the above, then please do not hesitate to contact Ashleigh Cook ([acook@iceniprojects.com](mailto:acook@iceniprojects.com) / 07741 656 453), or Molly Purcell ([mpurcell@iceniprojects.com](mailto:mpurcell@iceniprojects.com) / 07741 590 323) of this office in the first instance.

Yours Faithfully,

A handwritten signature in black ink that reads "Iceniprojects Ltd." in a cursive, slightly stylized font.

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