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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #52 –

INCOMPLETE

Started:	Monday, March 27, 2023 4:35:37 PM
Last Modified:	Monday, March 27, 2023 4:35:48 PM
Time Spent:	00:00:11
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Ziyad Thomas

[redacted]

Contact details:

Organisation (optional)	Planning Issues Ltd. on behalf of Churchill Retirement Living Ltd.
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Respondent skipped this question

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Respondent skipped this question

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

[redacted]

From: [redacted]
Sent: 27 March 2023 16:38
To: localplan@york.gov.uk
Cc: [redacted]
Subject: Representation to the York City Council Draft CIL Consultation
Attachments: Appendix 1.pdf; Appendix 2.pdf; Appendix 3.pdf; York CIL Viability Review - Mar23.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Planning Policy Team
Please find attached a representation on behalf of Churchill Retirement Living to the above-mentioned consultation. In the event the recommendations in this report are not implemented, the respondent would like to present their argument at the forthcoming Hearings for the Examination in Public.
Thank you for the opportunity for comment.
Kind regards
[redacted]

[redacted]

planning issues TOWN PLANNING AND ARCHITECTURE

Churchill House, Parkside, Ringwood, Hampshire, BH24 3SG. Tel: 01425 462100 Fax: 01425 462101

House Sales - Sales Progress Report (Active/Forthcoming)

Churchill Retirement Living Ltd

Movement Calculated From: 04/03/23 To: 10/03/23

Churchill Retirement Living

Region: Northern
Active

Development			Plots					Budget v Actual							Forward Sales in Hand				
Site Name	First Occ	Total Saleable Units	Opening Stock	UnRes 1 Bed	UnRes 2 Bed	Total UnRes TP	Year End Stock F'cast	Budget	Sales F'cast This Year	Res to Achieve F'cast	Comp TP	Comp YTD	Budget Comp YTD	Comp Var YTD	Exch	Current Res SSTC	Current Res OPOM	Total F'ward Sales	Temp Hold
Penrith	28/02/20	54	26	8	4	12	14	12	12	-2		7	9	-2	0	3	4	7	0
Kendal		64	64	37	19	56	54	10	10	2		0	0	0	0	2	6	8	3
Region: Northern		118	90	45	23	68	68	22	22	0		7	9	-2	0	5	10	15	3

	Movement This Period			Movement Year to Date				Visitors									Enquiries				
Site Name	Res (Gross) TP	Cancel'd TP	Res (Net) TP	Res (Gross) YTD	Cancel'd YTD	Res (Net) YTD	WD Rate	First Time Visits TP	First Time Visits YTD	Conv Rate 1st Visit to Res	Re-Visits TP	Sub Visits TP	Re-Visits YTD	Sub Visits YTD	Conv Rate 2nd Visit to Res	Revisits % of 1st Visits	Enq TP	Enq YTD	Conv Rate Enq to 1st Visit	Rate of Sale To Date	Rate of Sale This Year
Penrith	1		1	14	2	12	14,3%		49	28,6%	1		22	12	41,2%	69,4%	1	116	42,2%	0,82	0,78
Kendal			0	8	0	8	0,0%	6	69	11,6%	3		15		53,3%	21,7%	7	179	38,5%	0,00	0,00
Region: Northern	1		1	22	2	20		6	118		4		37	12			8	295			

Sales Status Active

	WD Rate	Conv Rate 1st Visit to Res	Conv Rate 2nd Visit to Res	Revisits % of 1st Visits	Conv Rate Enq to 1st Visit	Rate of Sale To Date	Rate of Sale This Year
Conversion Rate Year to Date	9,09%	15,64%	44,90%	41,53%	40,00%	0,92	0,78
Conversion Rate This Period	0,00%	16,67%	25,00%	66,67%	75,00%		

Forthcoming

Name	First Occ	Total Saleable Units	Opening Stock	UnRes 1 Bed	UnRes 2 Bed	Total UnRes TP	Year End Stock F'cast	Budget	Sales F'cast This Year	Res to Achieve F'cast	Comp TP	Comp YTD	Budget Comp YTD	Comp Variance YTD	Exch	Current Res SSTC	Current Res OPOM	Total F'ward Sales	Temp Hold
Total		0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	0
Region: Northern		118	90	45	23	68	68	22	22		0	7	9	-2	0	5	10	15	3

Name	Res (Gross) TP	Cancelled TP	Res (Net) TP	Res (Gross) YTD	Cancel'd YTD	Res (Net) YTD	WD Rate	First Time Visits TP	First Time Visits YTD	Conv Rate 1st Visit to Res	Re-Visits TP	Sub Visits TP	Re-Visits YTD	Sub Visits YTD	Conv Rate 2nd Visit to Res	Revisits % of 1st Visits	Enq TP	Enq YTD	Conv Rate Enq to 1st Visit	Rate of Sale To Date	Rate of Sale This Year
Total			0	0	0	0			0				0					0			
Region: Northern	1	0	1	22	2	20		6	118		4	0	37	12			8	295			

Active + Forthcoming

	WD Rate	Conv Rate 1st Visit to Res	Conv Rate 2nd Visit to Res	Revisits % of 1st Visits	Conv Rate Enq to 1st Visit	Rate of Sale To Date	Rate of Sale This Year
Conversion Rate Year to Date	9,09%	15,64%	44,90%	41,53%	40,00%	0,92	0,78
Conversion Rate This Period	0,00%	16,67%	25,00%	66,67%	75,00%		

House Sales - Sales Progress Report (Active/Forthcoming)
Churchill Retirement Living Ltd

Churchill Retirement Living

Movement Calculated From: 04/03/23 To: 10/03/23

Region: Northern
Active

Development			Plots					Budget v Actual							Forward Sales in Hand				
Site Name	First Occ	Total Saleable Units	Opening Stock	UnRes 1 Bed	UnRes 2 Bed	Total UnRes TP	Year End Stock F'cast	Budget	Sales F'cast This Year	Res to Achieve F'cast	Comp TP	Comp YTD	Budget Comp YTD	Comp Var YTD	Exch	Current Res SSTC	Current Res OPOM	Total F'ward Sales	Temp Hold
Group Active Total		3,111	1,495	751	336	1,087	795	700	700	292	5	213	411	-198	7	94	94	195	25
Conversion Rate Year to Date																			
Conversion Rate This Period																			
Group Forthcoming		94	94	63	31	94	94	0	0		0	0	0	0	0	0	0	0	
Group Total		3,205	1,589	814	387	1,181	889	700	700	292	5	213	411	-198	7	94	94	195	25
Active + Forthcoming Conversion Rate Year to Date																			
Conversion Rate This Period																			
Ideal Conversion Rates																			

	Movement This Period			Movement Year to Date				Visitors									Enquiries				
Site Name	Res (Gross) TP	Cancel'd TP	Res (Net) TP	Res (Gross) YTD	Cancel'd YTD	Res (Net) YTD	WD Rate	First Time Visits TP	First Time Visits YTD	Conv Rate 1st Visit to Res	Re-Visits TP	Sub Visits TP	Re-Visits YTD	Sub Visits YTD	Conv Rate 2nd Visit to Res	Revisits % of 1st Visits	Enq TP	Enq YTD	Conv Rate Enq to 1st Visit	Rate of Sale To Date	Rate of Sale This Year
Group Active Total	19	4	15	429	90	339		98	3,620		30	16	938	806			285	10,311			
Conversion Rate Year to Date							20.38%			11.85%					34.60%	48.18%			35.11%	0.67	0.42
Conversion Rate This Period							21.05%			15.39%					41.30%	46.84%			34.39%		
Group Forthcoming		0	0	0	0	0		0	1		0	0	0	0			12	449			
Group Total	19	4	15	429	90	339		98	3,621		30	16	938	806			297	10,751			
Active + Forthcoming Conversion Rate Year to Date							20.38%			11.85%					34.60%	48.16%			33.68%	0.67	0.42
Conversion Rate This Period							21.05%			15.39%					41.30%	46.84%			33.20%		
Ideal Conversion Rates							*15%*			*8%*					*25.00*	*35.00*			*55%*		

100% Open Market Retirement Living
York Draft CIL Charging Schedule

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Development Pro Forma
CRL
March 27, 2023

PROJECT PRO FORMA CRL

100% Open Market Retirement Living
York Draft CIL Charging Schedule

Project Pro Forma for Phase 1 Retirement Housing

Currency in £

REVENUE

Sales Valuation	**Units**	**m²**	**Sales Rate m²**	**Unit Price**	**Gross Sales**
1 Bed Flats	36	1,980.00	4,454.00	244,970	8,818,920
2 Bed Flats	24	1,800.00	4,600.00	345,000	8,280,000
Totals	**60**	**3,780.00**			**17,098,920**

TOTAL PROJECT REVENUE				**17,098,920**
DEVELOPMENT COSTS				
ACQUISITION COSTS				
Residualized Price			122,926	
				122,926
Agent Fee		1.00%	1,229	
Legal Fee		0.75%	922	
				2,151

CONSTRUCTION COSTS

Construction	**m²**	**Build Rate m²**	**Cost**
1 Bed Flats	2,640.00	1,690.00	4,461,600
2 Bed Flats	2,400.00	1,690.00	4,056,000
Totals	**5,040.00 m²**		**8,517,600**
Developers Contingency		5.00%	468,468
Site Works			200,000
s106	60.00 un	4,200.00 /un	252,000
Interim Future Homes Standard	60.00 un	2,260.00 /un	135,600
Biodiversity	60.00 un	231.00 /un	13,860

100% Open Market Retirement Living
York Draft CIL Charging Schedule

EV Charging			5,422	
SAC Mitigation	60.00 un	500.00 /un	30,000	
				9,622,950
Other Construction Costs				
External Costs		10.00%	851,760	
				851,760
PROFESSIONAL FEES				
Architect		10.00%	956,936	
				956,936
MARKETING & LEASING				
Marketing		3.00%	512,968	
				512,968
DISPOSAL FEES				
Sales Agent Fee		2.00%	341,978	
Sales Legal Fee	60.00 un	600.00 /un	36,000	
				377,978
Unsold Unit Fees				
1 Bed Flats			194,895	
2 Bed Flats			125,745	
				320,640
TOTAL COSTS BEFORE FINANCE				**12,768,309**
FINANCE				
Debit Rate 7.50%, Credit Rate 0.50% (Nominal)				
Land			17,380	
Construction			495,673	
Other			397,774	
Total Finance Cost				910,827
TOTAL COSTS				**13,679,136**

100% Open Market Retirement Living
York Draft CIL Charging Schedule

PROFIT

		3,419,784

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
IRR% (without Interest)	22.62%

100% Open Market Retirement Living
York Draft CIL Charging Schedule

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Development Pro Forma
CRL
March 27, 2023

100% Open Market Retirement Living
York Draft CIL Charging Schedule

Table of Land Cost and Land Cost

	Sales: Rate /m²						
Construction: Rate /m²	-10.000%	-7.500%	-5.000%	-2.500%	0.000%	+2.500%	+5.000%
-10.000%	(£20,141)	(£288,867)	(£557,593)	(£826,319)	(£1,095,045)	(£1,363,770)	(£1,632,496)
1,521.00 /m²	(£20,141)	(£288,867)	(£557,593)	(£826,319)	(£1,095,045)	(£1,363,770)	(£1,632,496)
-7.500%	£236,147	(£45,837)	(£314,563)	(£583,289)	(£852,015)	(£1,120,741)	(£1,389,467)
1,563.25 /m²	£236,147	(£45,837)	(£314,563)	(£583,289)	(£852,015)	(£1,120,741)	(£1,389,467)
-5.000%	£493,634	£208,923	(£71,533)	(£340,259)	(£608,985)	(£877,711)	(£1,146,437)
1,605.50 /m²	£493,634	£208,923	(£71,533)	(£340,259)	(£608,985)	(£877,711)	(£1,146,437)
-2.500%	£751,120	£466,409	£181,698	(£97,230)	(£365,955)	(£634,681)	(£903,407)
1,647.75 /m²	£751,120	£466,409	£181,698	(£97,230)	(£365,955)	(£634,681)	(£903,407)
0.000%	£1,009,624	£723,895	£439,184	£154,473	(£122,926)	(£391,652)	(£660,377)
1,690.00 /m²	£1,009,624	£723,895	£439,184	£154,473	(£122,926)	(£391,652)	(£660,377)
+2.500%	£1,268,603	£982,215	£696,671	£411,960	£127,248	(£148,622)	(£417,348)
1,732.25 /m²	£1,268,603	£982,215	£696,671	£411,960	£127,248	(£148,622)	(£417,348)
+5.000%	£1,528,970	£1,241,175	£954,805	£669,446	£384,735	£100,024	(£174,318)
1,774.50 /m²	£1,528,970	£1,241,175	£954,805	£669,446	£384,735	£100,024	(£174,318)
+7.500%	£1,789,336	£1,501,317	£1,213,766	£927,396	£642,221	£357,510	£72,799
1,816.75 /m²	£1,789,336	£1,501,317	£1,213,766	£927,396	£642,221	£357,510	£72,799
+10.000%	£2,050,038	£1,761,683	£1,473,664	£1,186,357	£899,987	£614,997	£330,286
1,859.00 /m²	£2,050,038	£1,761,683	£1,473,664	£1,186,357	£899,987	£614,997	£330,286
+12.500%	£2,311,742	£2,022,052	£1,734,030	£1,446,011	£1,158,947	£872,577	£587,772
1,901.25 /m²	£2,311,742	£2,022,052	£1,734,030	£1,446,011	£1,158,947	£872,577	£587,772

Sensitivity Analysis : Assumptions for Calculation

Sales: Rate /m²
Original Values are varied by Steps of 2.500%.

Heading	Phase	Rate	No. of Steps

SENSITIVITY ANALYSIS REPORT CRL

100% Open Market Retirement Living
York Draft CIL Charging Schedule

1 Bed Flats	1	£4,454.00	4.50 Up & Down
2 Bed Flats	1	£4,600.00	4.50 Up & Down

Construction: Rate /m²
Original Values are varied by Steps of 2.500%.

Heading	Phase	Rate	No. of Steps
1 Bed Flats	1	£1,690.00	4.50 Up & Down
2 Bed Flats	1	£1,690.00	4.50 Up & Down

SENSITIVITY ANALYSIS REPORT CRL

100% Open Market Retirement Living
York Draft CIL Charging Schedule

+7.500%	+10.000%	+12.500%
(£1,901,222) (£1,901,222)	(£2,169,948) (£2,169,948)	(£2,438,674) (£2,438,674)
(£1,658,192) (£1,658,192)	(£1,926,918) (£1,926,918)	(£2,195,644) (£2,195,644)
(£1,415,163) (£1,415,163)	(£1,683,889) (£1,683,889)	(£1,952,614) (£1,952,614)
(£1,172,133) (£1,172,133)	(£1,440,859) (£1,440,859)	(£1,709,585) (£1,709,585)
(£929,103) (£929,103)	(£1,197,829) (£1,197,829)	(£1,466,555) (£1,466,555)
(£686,074) (£686,074)	(£954,799) (£954,799)	(£1,223,525) (£1,223,525)
(£443,044) (£443,044)	(£711,770) (£711,770)	(£980,496) (£980,496)
(£200,014) (£200,014)	(£468,740) (£468,740)	(£737,466) (£737,466)
£45,574 £45,574	(£225,710) (£225,710)	(£494,436) (£494,436)
£303,061 £303,061	£18,350 £18,350	(£251,406) (£251,406)

REVIEW OF CIL VIABILITY ASSESSMENT

FOR RETIREMENT LIVING HOUSING

YORK CITY COUNCIL

MARCH 2023

Contents

[redacted]

1. Introduction

1.1.1 This supporting statement has been prepared on behalf of Churchill Retirement Living, an independent housebuilder specialising in housing for older people.

1.1.2 In this statement we critically appraise the evidence underpinning the proposed Community Infrastructure Levy (CIL) rates in the York City Council Draft Charging Schedule consultation.

1.1.3 This Statement is a focused document which, in the interest of brevity, does not comprehensively detail Government policy on CIL or viability more generally, nor does it detail the residual land appraisal methodology at length. These matters are comprehensively covered in the Council's *CIL Viability Study*.

2. Review of Proposed CIL rates

2.1.1 The proposed Community Infrastructure Levy (CIL) rates in the York City Council Draft Charging Schedule consultation are as follows:

Development type	CIL rate per sqm
Residential dwellings within the City of York	£200
Residential dwellings within the City of York Local Plan strategic sites ST7, ST8, ST9, ST14 and ST15	£0
Residential dwellings within the remaining City of York Local Plan strategic sites	£100
Sheltered / Retirement accommodation	£100
Extra care accommodation on Brownfield sites	£100
Extra care accommodation on Greenfield sites	£0
Purpose Built Student Housing without an affordable housing contribution	£150
Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution	£50
Convenience[1] retail with up to 450 sqm gross internal area	£100
Comparison[2] retail built outside the City Centre boundary	£100
Comparison retail built inside of the City Centre boundary	£0
All other development	£0

2.1.2 There is a Borough-wide bespoke CIL rates for Sheltered / Retirement Housing of £100 per m².

2.2 Older Persons' Housing Typologies

2.2.1 The proposed Community Infrastructure Levy (CIL) rates in the York City Council Draft Charging Schedule consultation are informed by the *CIL Viability Assessment* (CVA) by Porter Planning Economics (December 2022).

2.2.2 We note that the CVA has assessed the viability of older persons' housing typologies, which is welcomed.

2.2.3 In reviewing the methodology for assessing specialist older persons' housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although a number do not. Our concerns are that the CIL Viability Assessment has overplayed the viability of older persons' housing.

2.2.4 Mindful of the guidance in the PPG that is the responsibility of site owners and developers to engage in the Plan making process. Churchill Retirement Living have provided commentary and supplemental evidence on the viability assumptions used in the viability appraisals for retirement living housing typologies in the VA.

3. Viability Appraisal Inputs

3.1 Introduction

3.1.1 Churchill Retirement Living have considered the inputs and assumptions used in the financial viability appraisals for older persons' housing in the *CIL Viability Assessment* (CVA) by Porter Planning Economics (December 2022). A summary table has been provided in the table entitled: *Comparison of Appraisal Inputs* on page 6 of this report.

3.1.2 Many of the inputs used in our appraisal of Retirement Living housing typologies align with the methodology detailed in the *Briefing Note on Viability Prepared for the Retirement Housing Group* (hereafter referred to as the RHG Briefing Note) by Three Dragons. Where they differ is clearly stated in this report.

3.2 Unit Sizes

3.2.1 Apartments for specialist older persons' housing tend to be larger than 'general needs' open market housing. The 1-bed unit sizes used in the CVA (50m²) do however differ from those recommended in the RHG Briefing Note and no justification has been given for this deviation.

RHG Briefing Note Recommended Unit Sizes

	1 bed	2 bed
Sheltered	55 m²	75 m²

3.3 Sales Values

3.3.1 The CVA concludes that sales values for retirement living housing is £4,788 per m², which is determined using the RHG methodology.

3.3.2 Churchill Retirement Living recently had an application at No.11, The Village, Wigginton in which a Financial Viability Appraisal was submitted and reviewed by an independent surveyor acting on behalf of the Council. Sales Values were agreed as:

- £245k for a 1 bed (£4,454 per m²)
- £345k for a 2 bed (£4,600 per m²)

3.3.3 These sales values have been applied to the appraisal. It must however be noted that Wigginton is one of the highest value areas in the Authority, with the *Figure 3.7* of the CVA concluding as such. It should not therefore be presumed that the aforementioned sales values can be achieved across the Authority.

3.4 Unit Mix

3.4.1 The RHG briefing note recommends a 60:40 split for 1bed:2 beds. We have used the recommended mix.

3.5 Base Build Cost

3.5.1 Build costs are covered in Chapter 4 of the CVA which advocates the use of the appropriate BCIS 'Median Generally' costs as a base rate.

BCIS

£/m2 study

Description: Rate per m2 gross internal floor area for the building Cost including prelims.
Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: 10 years

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
843. Supported housing							
Generally (10)	1,813	928	1,465	1,690	2,112	3,527	76
Single storey (10)	1,987	1,624	1,744	2,072	2,164	2,400	7
2-storey (10)	1,831	1,121	1,477	1,623	2,207	3,190	27
3-storey (10)	1,637	928	1,372	1,609	1,868	2,508	25
4-storey or above (10)	1,969	1,139	1,490	1,821	2,322	3,527	17
843.1 Supported housing with shops, restaurants or the like (10)	1,737	1,087	1,440	1,636	1,832	2,907	21

3.5.2 The respondents have based their appraisal on the March 2023 Median 'generally' BCIS rates for supported housing, re-based to York which are £1,690 per m².

3.6 Sales Rate

3.6.1 The sales rate utilised in the CVA for retirement living housing are unknown.

3.6.2 A rate of sale of one unit per month, as per the RHG's best practice methodology, is considered by Churchill Retirement Living to be, broadly speaking, an appropriate reflection of their sales rate nationally, albeit the rate of sale nationally is lower presently.

3.6.3 York is located in the respondent's Northern region, where the rate for all selling sites is 0.92 sales per month, which reflects the current uncertainty in the market. Evidence of this sales rate is provided in **Appendix 1.**

3.7 Gross to Net

3.7.1 The RHG note stipulates a range of communal floor space between 20-30% of GIA for Sheltered and 35-40% of GIA for Extra Care.

3.7.2 Our experience is that this percentage should be at least 25% of the proposed total area for retirement living housing in order to to cater for communal lounges, lodge manager office and guest rooms. Para. 4.13 advises that communal floorspace provision tested was 25%.

3.8 Benchmark Land Value

3.8.1 A 60-unit retirement living development built at 125dph is presumed to have a Gross site area of 0.5ha in the CVA. Benchmark Land Values.

Table 4.15 Tested Benchmark Land Values for Greenfield and Brownfield sites, £ per hectare

Existing land use	EUV per gross site area		Additional premium on the net area	EUV+ per net ha
City centre/extension	£1,700,000	Plus	0%	£1,700,000
Urban & suburban	£930,000		24%	£1,120,000
Village /rural	£750,000		24%	£900,000
Agricultural/ Greenfield	£20,000		2150%	£450,000

3.8.2 The respondents do not ordinarily develop greenfield land, with a typical site being within 0.5 miles of a town or local centre, to best facilitate the independence of the intended residents. We have no comments on the value of greenfield sites accordingly.

3.8.3 It is also more likely that in the edge-of-centre locations typically developed by the respondents, development opportunities are likely to be commercial / office units, former health care facilities such as care homes or site assemblies comprising one or more residential properties. The PDL City Centre / Extension and Urban & Suburban Residential Benchmark Land Values have been tested accordingly.

3.9 Profit

3.9.1 The *CIL Viability Study* allows for a 20% profit margin, which conform with the recommendations of the RHG Briefing note. The Planning Inspectorate has also consistently concluded that an acceptable return for risk in respect of retirement living proposals is not less than 20% of gross development value. Examples include:

- McCarthy and Stone proposal at Redditch (Appeal Ref: 3166677)
- Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137)
- Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412)

3.10 Empty Property Costs

3.10.1 Empty property costs are a function of council tax payable on finished unsold and empty property as well as the service charge which must be paid owing to longer than average sales periods for this type of proposal.

3.10.2 York Council applies the Council Tax Empty Property Premium. Council Tax rises to 100% if the property has been empty for longer than two years, 200% for over five years, and 300% if it remains empty for longer than ten years

3.10.3 A typical 50-unit scheme will take over 4 years to sell out and as such substantial monies will be paid in Council Tax over this period.

3.10.4 Residents of specialist older persons' housing are also required to pay a service charge to pay for the upkeep of communal facilities and for staff costs. Service charges are higher for Extra Care accommodation because of the enhanced level of communal facilities and the increased staffing associated with on-site care. Staff and facilities need to be on-site and functional from when the first resident arrives and accordingly the companies subsidise the service charges of empty apartments while they are being sold. McCarthy Stone list their typical services charges on their website as follow:

McCarthy Stone – Typical Service Charge

	1 bed per week	2 bed per week
Sheltered	£48.93	£138.27
Extra Care	£73,36	£184.31

3.10.5 Empty property costs as a result of Council Tax and Service Charge payments are therefore a substantial cost for older persons' housing. We have applied Empty Property Costs of £3k per unit retirement living unit.

3.11 Sales & Marketing Costs

3.11.1 Sales and marketing allowances for specialist housing proposals for older people are widely acknowledged to differ substantially from mainstream housing. This is due to the restricted occupancy and longer than average sales periods often extending over several years.

3.11.2 Sales and marketing activities in respect of this type of proposal are considerably more intensive and long running than mainstream housing and necessitate a sustained campaign with permanent sales staff on site over the course of typically years rather than months for mainstream housing.

3.11.3 The RHG Briefing Note advises that "*Marketing costs are typically 6% of revenue compared with 3% of revenue for general needs houses and flats."* This has been supported by a recent appeal decision in Redditch Appeal Ref: 3166677.

3.12 Interest Rates

3.12.1 We note that the appraisals assume 7.75% per annum for total debit balances (to include interest and associated fees).

3.12.2 Without accurately cash flowing all aspects of the development timeframe (i.e. pre-construction / construction / sales) It is impossible to accurately assess the finance costs of a retirement living or extra care project.

Comparison of Viability Inputs

	Retirement Living	
	PE	CRL
Sales Values	£4,788 per m²	£245 for a 1 bed (£4,454 per m²) £345k for a 2 bed (£4,600 per m²)
Unit Size	1bed- 50m²	1bed – 55 m²
	2 bed -75m²	2 bed – 75 m²
Benchmark Land Value	£850K City Centre / Extension £560K Urban & Suburban	£850K City Centre / Extension £560K Urban & Suburban
Dwellings per hectare	120dph	125dph
Dwelling Mix	Unknown	60% 1-bed 40% 2-beds
No. of units	60	60
Site size	0.5 Hectares (Gross)	0.5 Hectares (Gross)
Build Period	24 months	18 months
Sales Period	Unknown	50 Months
Base Build Costs	£1,600 per m².	£ 1,690 per m².
Site Costs	£400kper ha	£400kper ha
% Communal floorspace	25%	25%
Biodiversity Net Gain	£231 per unit	£231 per unit
Contingencies	4% of build costs	5% of build costs
Professional Fees	8% of build costs	10% of build costs
Interim Future Homes Standards	£2,260 per units	£2,260 per units
Future Homes Standard	£9k per flat	£9k per flat
EV Charging	£976 per unit	£5,422 based on 1:3 parking provision
S106 Costs	£4,200k per unit	£4,200k per unit
M4(3)	£7,750 per flat	£7,750 per flat
SAC Contributions	£500 per dwelling	£500 per dwelling
Finance Costs	7.75% per annum	7.5%
Profit	20%	20%
Agents Fee % of site value	1.5%	1.5%
Sales & Marketing	3%	6%
Legal Fees (% of site value)	0.75%	0.75%
Empty Property Costs	Unknown	£3,000 per unit

4. Commentary on LPVS Results

4.1.1 Churchill Retirement Living find the basis on which the proposed Community Infrastructure Levy rates for retirement living to be unjustified.

4.1.2 The results of the viability modelling for sheltered housing are provided in Table 6.3. which is detailed below:

Table 6.3 Viability of sites in CYC and their psm CIL liable floorspace headroom

ID	Typology		Headroom per CIL liable sqm
OP 3	60 unit Retirement home - Greenfield	Urban	£85
OP 4	60 unit Retirement home - Brownfield	Urban	£266
OP 7	60 unit Retirement home - Greenfield	Village/Rural	£116
OP 8	60 unit Retirement home - Brownfield	Village/Rural	£293
OP 11	50 unit Extracare home - Greenfield	Urban	-£39
OP 12	50 unit Extracare home - Brownfield	Urban	£139
OP 15	50 unit Extracare home - Greenfield	Village/Rural	-£10
OP 16	50 unit Extracare home - Brownfield	Village/Rural	£164

4.1.3 It concludes that retirement living housing can deliver policy compliant levels of affordable housing and CIL contributions well in excess of those proposed in the Draft Charging Schedule.

4.1.4 The respondents' have significant reservations over both the methodology and assumptions used in the CIL Viability Assessment which appears to substantially overstates the viability of these forms of accommodation.

4.1.5 Our review of the CIL Viability Assessment notes that the proposed Build Costs are too low, with the proposed sales values being too high. Of particular concern is the omission of any information on cashflow, notably sales rates and empty property costs.

4.1.6 It is the respondents view that the cumulative impact of differences in viability assumptions used in the LPVA presents an assessment of the viability of retirement living housing that is not credible.

5. Results

5.1 Older Persons' Housing Typologies

5.1.1 The outputs of the viability appraisals for older persons' housing typologies are summarised below for ease of reference. This FVA does not include any affordable housing or CIL as part of the appraisal and is therefore undertaken based on a 100% private proposal. A summary is provided in **Appendix B.**

5.1.2 The residual land value is £122,926 which results in a negative residual land value against the Benchmark Land Value for City Centre / Extension sites (£850K) and Urban & Suburban sites (£560k).

5.1.3 Retirement Living housing is therefore unable to contribute towards either affordable housing or CIL.

5.1.4 Specialist older persons' housing providers are already heavily reliant on factors that reduce the cost of development in order to bring specialist older persons' housing coming forward such as achieving efficiencies in the build cost or achieving a lower level of profit.

5.1.5 The respondents' however have significant reservations over aspects of the *CIL Viability Assessment* (CVA which overstates the viability of this forms of accommodation. For example, it is presumed that sales rate used in the CVA was higher than the 1 unit per month which, generally, reflects the respondent's experience.

5.1.6 It is the respondent's view that the cumulative impact of other differences in viability assumptions used in the VA presents an overly optimistic assessment of the viability of older persons' housing.

5.2 Sensitivity Testing

5.2.1 The Argus Developer sensitivity function has been applied to test the impact of variations within proposed sales values and build costs for the appraisal assuming 0% affordable housing and nil CIL. The output in **Appendix 3.**

5.2.2 Looking across the next 5 years, BCIS tender prices are forecast to increase at a rate of circa 9% over 2021/22 and from thereon 5%, 4% and 3% or in excess of 25% over the next 6 years.

Table 7: BCIS forecast of tender prices

Period	Forecast
2Q2021 to 2Q2022	+9.1%
2Q2022 to 2Q2023	+5.5%
2Q2023 to 2Q2024	+4.7%
2Q2024 to 2Q2025	+3.8%
2Q2025 to 2Q2026	+2.7%
2Q2026 to 2Q2027	+2.4%

Source: BCIS

5.2.3 In terms of sales value growth over the same period, there is much uncertainty regarding the property market at present given the Bank of England changes to base lending rates in September 2022 and forecast further increases in 2023 to curb rates of inflation. It is forecast that the knock-on impact on mortgage affordability and wider cost of living issues at present will put an end to the inflation seen in house price growth seen over the last few years. In general, market commentators are forecasting house price reductions across the market during 2023[1].

5.2.4 The RICS Market Survey (Oct 22)[2] concludes:

1.1.1

[1] UK housebuilders' shares tumble on gloomy house price predictions | Financial Times (ft.com)

[2] 10. web -october 2022 rics uk residential market survey final.pdf

Looking ahead, the net balance for the twelve-month price expectations series sank to -42% in the latest findings, falling from a reading of -18% last time. When viewed at the regional/country level, respondents across all parts of the UK are now (on balance) of the opinion that prices will see some degree of decline over the year ahead.

5.2.5 Savills at November 2022[3] forecast the following 5 year mainstream housing performance.

UK mainstream house price forecasts

	2023	2024	2025	2026	2027	5-year
UK mainstream house prices	-10.0%	1.0%	3.5%	7.0%	5.5%	6.2%

Source: *Savills Research*

5.2.6 The immediate outlook therefore is for costs to continue to inflate with some uncertainty in relation to open market sales values beyond 2022.

6. Conclusion

6.1.1 Churchill Retirement Living are strongly of the view that it would be more appropriate to set a nil CIL rate for retirement living housing, at the very least on brownfield sites.

6.1.2 This approach accords with the guidance of the PPG which states that:

The regulations allow charging authorities to apply differential rates in a flexible way, to help ensure the viability of development is not put at risk. Charging authorities should consider how they could use differential rates to optimise the funding they can receive through the levy. Differences in rates need to be justified by reference to the viability of development. Differential rates should not be used as a means to deliver policy objectives.

Differential rates may be appropriate in relation to

- *geographical zones within the charging authority's boundary;*
- *types of development; and/or*
- *scales of development.*

(PPG Paragraph: 022 Reference ID: 25-022-20230104)

6.1.3 In the event the abovementioned amendment is not implemented prior to submission for Examination in Public, Churchill Retirement living request the opportunity to present their case at Examination in Public.

1.1.1

[3] Savills UK | Mainstream residential market forecast 2023-27

[redacted]

From: [redacted]
Sent: 21 March 2023 13:35
To: [redacted]
Cc:
Subject: NYCC Formal Response_City of York Community Infrastructure Levy (CIL) Draft Charging Schedule Consultation February 2023
Attachments: NYCC response _York CIL.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

Thank you for consulting with NYCC on the above documents. Please find attached our comments.

With kind regards

[redacted]

Growth, Planning & Trading Standards | Business & Environmental Services |
North Yorkshire County Council |County Hall | Racecourse Lane |
Northallerton| North Yorkshire | DL7 8AD

[redacted]

Although we have endeavoured to ensure that this e-mail and any attachments are free from any virus we would advise you to take any necessary steps to ensure that they are actually virus free.

If you receive an automatic response stating that the recipient is away from the office and you wish to request information under either the Freedom of Information Act, the Data Protection Act or the Environmental Information Regulations please forward your request by e-mail to the Information Governance Team (infogov@northyorks.gov.uk) who will process your request.

North Yorkshire County Council.

North Yorkshire County Council

Send by Email:

Via Email

Growth, Planning & Trading Standards
County Hall
Racecourse Lane
NORTHALLERTON
DL7 8AD

[redacted]

Date: 21 March 2023

Closing Date: 27 March 2023

Send by Email: [redacted]

[redacted]

City of York Community Infrastructure Levy (CIL) Draft Charging Schedule Consultation (Feb 2023)

Thank you for consulting North Yorkshire County Council (NYCC) on the above document. North Yorkshire County Council welcomes the opportunity to provide comments.

Officers from across our service areas have reviewed the consultation documentation and at this stage have no comments to make in relation to the CIL Draft Charging Schedule and evidence base.

Should you wish to discuss any element of this response or require further information please do not hesitate to contact me.

Yours sincerely,

[redacted]

[redacted]

From: [redacted]
Sent: 28 March 2023 18:06
To: [redacted]
Subject: RE: Community Infrastructure Levy Consultation
Attachments: MS response to Main Modifications_24032023_letter.pdf; York CIL Charging Schedule Consulation 28.03.23.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [redacted]

Thank you, that is most kind. Please find attached the representations on the Charging Schedule and the Main Modifications to the local plan on behalf of my client, McCarthy Stone.

Kind regards,

[redacted]

The Planning Bureau Limited

Bournemouth • Coventry • Hatfield • Manchester • Ringwood • Woking • York

Address: 4th Floor 100 Holdenhurst Road Bournemouth Dorset BH8 8AQ

[redacted]

[redacted]
Sent: 28 March 2023 15:33
[redacted]
Subject: RE: Community Infrastructure Levy Consultation

[redacted]

Although the closing date has now passed, I understand you have been ill so we will accept your submission to the CIL consultation. Please send as soon as possible.

Thanks

[redacted]

Fr[redacted]
Sent: 28 March 2023 12:20
[redacted]
Subject: Community Infrastructure Levy Consultation

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

I had intended to submit a representation yesterday on behalf of my client McCarthy Stone but I was unable to issue it due to being unwell. Would you accept a late representation if I was able to get this to you tomorrow, please?

Kind regards,

[redacted]

Group Planning Manager

The Planning Bureau Limited

Bournemouth • Coventry • Hatfield • Manchester • Ringwood • Woking • York

Address: 4th Floor 100 Holdenhurst Road Bournemouth Dorset BH8 8AQ

[redacted]

Strategic Planning Policy Team
West Offices
Station Rise
York
YO1 6GA

Via email: [redacted]

24th March 2023

Dear Sirs,

RESPONSE ON BEHALF OF MCCARTHY STONE TO THE CITY OF YORK COMMUNITY INFRASTRUCTURE LEVY (CIL) CONSULTATION FEBRUARY 2023

Thank you for the opportunity to comment on the City of York CIL Consultation. McCarthy Stone is the leading provider of specialist housing for older people including retirement housing and extra care housing. Please find below our comments on the consultation.

We have reviewed the inputs and assumptions used in the financial viability appraisals for older persons' housing in the CIL Viability Assessment (VA) by Porter Planning Economics (December 2022). We are particularly concerned about the methodology and assumptions used in the CIL Viability Assessment which appears to substantially overstates the viability of these forms of accommodation. While we note that the VA has reviewed older persons' housing typologies, we note that some of the inputs do not align with the Briefing Note on Viability Prepared for the Retirement Housing Group (RHG Briefing Note) and for this reason we are concerned that the delivery of retirement and extra care accommodation (on greenfield sites) will be rendered unviable by the imposition of the proposed CIL rates.

We therefore commend the Council on their decision to test the viability of a number of forms of specialist accommodation for the elderly, within both the C3 and C2 land uses classes and for providing a separate levy rate for Retirement/ Extra Care housing on greenfield sites based on this testing. However, the proposal for a levy for Sheltered / retirement accommodation of £100psm and a levy of £100psm for Extra Care accommodation on brownfield sites but no levy for Extra Care accommodation on greenfield sites requires further consideration.

We would ask that if the Charging Schedule is reviewed in future that specialist housing for the elderly is similarly included in any viability reappraisal. It follows too, that if assumptions and the viability assessment are revisited during the Examination process, following submissions from the wider development industry that Retirement/Extra Care Housing must also be revisited.

The emerging local plan states that where development falls within Use Class C3, affordable housing provision will be required. For this reason, Extra Care housing, falling within Use Class C2 is not required to provide affordable housing and the scenarios tested in the VA demonstrate that Extra Care accommodation on Greenfield sites are unviable, however given the land values associated with brownfield sites, without seeing the full appraisals run by Porter Planning we cannot understand how Extra Care accommodation can be expected to remain viable with a CIL charge of £100psqm.

Our chief concerns are as follows:

Unit sizes

Apartments for specialist older persons' housing tend to be larger than 'general needs' open market housing.

The 1-bed unit sizes used in the CVA ($50m^2$) differ from those recommended in the RHG Briefing Note, which recommends $55m^2$ for a 1 bed and $75m^2$ for a 2 bed. No justification has been given for this deviation.

Sales Values

The CVA concludes that sales values for retirement living housing is £4,788 per m^2, which is determined using the RHG methodology. Based on the lack of comparable sales values found by the VA the assumed sales values are considered to be too high.

No detail is provided in respect of sales rates. At present sales rates are on average less than 1 per month and these testing should be factored in.

Sales and Marketing Costs

In the case of retirement housing for example there is also a much longer sales period which reflects the niche market and sales pattern of a typical retirement housing development. This has a significant knock on effect upon the final return on investment. This is particularly important with empty property costs, borrowing and finance costs and sales and marketing which extend typically for a longer time period. As a result of this typical sales and marketing fees for specialist accommodation for the elderly are often closer to 6% of GDV, as stipulated in the RHG Briefing note.

Build Costs

The justification for the enhanced levy on older person accommodation are a **fall** in BCIS build costs for these units between Q2 2021 and Q3 2022. This has not been the experience of McCarthy Stone. While the BCIS Build Costs are reporting this fall it is widely accepted that build costs throughout the UK have increased over this period and therefore care needs to be taken to ensure this rise is reflected within the VA.

BLV

A 60-unit retirement living development built at 125dph is presumed to have a Gross site area of 0.5ha in the VA. We accept that the assumed BLVs is an acceptable level for Extra Care and Retirement Housing typologies

Profit

The VA allows for a 20% profit margin, which is in line with the recommendations of the RHG Briefing note, and which we accept is an acceptable level for Extra Care and Retirement Housing typologies.

Gross to Net

The RHG note stipulates a range of communal floor space between 20-30% of GIA for Sheltered and 35-40% of GIA for Extra Care. The VA has included 25% for Sheltered and 37.5% for Extra Care which is considered to be low but within the guidance provided by the RHG Briefing note.

Empty Property Costs

Properties can only be sold upon completion of the development and the establishment of all the communal facilities and on-site house manager. These communal areas cost additional monies to construct and are effectively subsidised by the developer until a development has been completely sold out. In a McCarthy Stone development the staff costs and extensive communal facilities are paid for by residents via a management / service charge. However, due to the nature of these developments the communal facilities have to be fully built and operational from the arrival of the first occupant. Therefore, to keep the service charge at an affordable level for residents, service charge monies that would be provided from empty properties are subsidised by the Company (these are typically known as Empty Property Costs).

This is a considerable financial responsibility as, as previously mentioned, it usually takes a number of years to fully sell a development. Empty property costs as a result of Council Tax and Service Charge payments are therefore a substantial cost for older persons' housing. For a typical 50 unit McCarthy and Stone Later Living development the Empty Property Costs are on average £3k a unit. For an Extra Care scheme this can be higher as a typical service charge is typically 33% more than retirement apartments.

Concluding remarks

In light of the above, we would suggest that the Council ensure that there is sufficient headroom in the viability of developments and that its policy requirements are robustly tested and the inputs for empty property costs and sales rates in particular are re-evaluated.

Our review of the CIL Viability Assessment notes that the proposed Build Costs are too low, with the proposed sales values being too high.

Of particular concern is the omission of any information on cashflow, notably sales rates and empty property costs.

McCarthy Stone are strongly of the view that it would be more appropriate to set a nil CIL rate for retirement living housing, at the very least on brownfield sites and that Extra Care Housing on Greenfield sites should also attract a nil rate.

This approach accords with the guidance of the PPG which states that:

'The regulations allow charging authorities to apply differential rates in a flexible way, to help ensure the viability of development is not put at risk. Charging authorities should consider how they could use differential rates to optimise the funding they can receive through the levy. Differences in rates need to be justified by reference to the viability of development. Differential rates should not be used as a means to deliver policy objectives.

Differential rates may be appropriate in relation to:

- *geographical zones within the charging authority's boundary;*
- *types of development; and/or*
- *scales of development.*

(PPG Paragraph: 022 Reference ID: 25-022-20230104)'

McCarthy and Stone wish to be invited to represent their case at Public Examination if the above amendments are not included following this representation.

Yours sincerely,

[redacted]

Nimbuscare Limited, Acomb Garth Community Care Centre, 2 Oak Rise, York, YO24 4LJ

[redacted]

[redacted] Partnership

21.3.23

[redacted]

Re; Community Infrastructure Levy Consultation (closing 27.3.23)

Many thanks to you and [redacted] for sharing the consultation document and for inviting your colleagues to present the emerging York City Local Plan to colleagues at the recent Health and Care Partnership Board.

I wanted to write to express some concerns around the amount being earmarked for the development of health premises in the consultation document. We are faced with a situation where infrastructure in General Practice in the city is becoming a significant concern. There has been very little development over the last decade and we now face a significant increase in population due to the increase in housing proposed by the plan. We are anticipating 10,000 additional dwellings and potential increase in population of 40,000 citizens according to the data presented by colleagues at the partnership meeting.

We find ourselves facing not only an increasing population but also an ageing population and with that comes both increasing medical complexity and increasing health and social care need. This comes in the context of the recent Health and Social Care Act which is encouraging a shift of care into the community and out of Hospital and that in turn will add more pressure onto the community infrastructure. We will, as recent Nimbuscare activity has demonstrated, see increased collaboration between sectors delivered in the community but as you know we are currently delivery some of that from temporary facilities from a council owned car park, which has been earmarked for housing development.

There is no doubt that General Practice in the city of York required significant infrastructure investment if it is to keep up with the demand of the population. This may involve modernising or extending existing buildings but will also require the development of additional new builds. These may take the form of GP practices but will also include community hubs allowing collaborative working along the lines of the Acomb Garth Facility that has recently been developed with NHS Property Services.

I would like to express concern that my GP colleagues have not been engaged in this process and therefore the projected funding shortfall for healthcare seems woefully inadequate and this could pose a risk for future citizens of York especially given our health and social care ambitions are so high. This seems to be brought further into focus when the funding requirements for leisure activities and green infrastructure are 12 times higher than that suggested for healthcare (and this doesn't mean to say I don't recognise the important of these). Furthermore the healthcare funding is across the board including secondary care requirements.

I am not aware that a full primary care estate needs assessment has been carried out recently in light of the proposed local plan and therefore I would like to express concerns that the process by which these figures have been arrived at is flawed. If we had been more involved earlier in the process we could have supported a primary care needs assessment and the offer to do that moving forward is firmly on the table. We recognise this will take time but we feel this is vitally important for the health of the citizens of York – failure to address this could have significant consequences.

Many thanks for taking the time to considering this response and including it in the formal response to the consultation. On behalf of General Practice I pledge commitment to being part of this process moving forward if that is possible.

Yours Sincerely,

[redacted]

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #40 –

COMPLETE

Started:	Wednesday, March 22, 2023 2:37:45 PM
Last Modified:	Wednesday, March 22, 2023 2:40:08 PM
Time Spent:	00:02:23
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Fiona Hill

[redacted]

Contact details:

Organisation (optional)	Heslington Parish Council
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL)

Draft Charging Schedule

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

Q22

9a. Do you have any other comments on the CIL evidence base?

The Parish Council would give general support to the implementation of Community Infrastructure Levy (CIL) Draft Charging Schedule

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #5 –

COMPLETE

Started:	Monday, February 13, 2023 6:21:32 PM
Last Modified:	Monday, February 13, 2023 6:30:35 PM
Time Spent:	00:09:02
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

James Flinders

[redacted]

Contact details:

Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

This study makes no reference to the part of the levy which goes to town / parish councils under section 58A of the Community Infrastructure Levy (Amendment) Regulations 2013.

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

This study makes no reference to the part of the levy which goes to town / parish councils under section 58A of the Community Infrastructure Levy (Amendment) Regulations 2013.

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

No comments

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

No comments

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

No comments

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

No comments

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

No comments

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

No comments

Q22

9a. Do you have any other comments on the CIL evidence base?

The evidence base makes no reference to the part of the levy which goes to town / parish councils under section 58A of the Community Infrastructure Levy (Amendment) Regulations 2013. It also doesn't take steps to support the establishment of town / parish councils in unparished areas of the city to allow them to benefit from the levy.

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #56 –

COMPLETE

Started:	Monday, March 27, 2023 6:21:50 PM
Last Modified:	Monday, March 27, 2023 6:30:35 PM
Time Spent:	00:08:45
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Helen Apsey

[redacted]

Contact details:

Organisation (optional)	Make It York
Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Respondent skipped this question

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Respondent skipped this question

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of

development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

The Community Infrastructure Levy (CIL) Infrastructure Funding Gap Assessment (December 2022) references Paragraph 20 of the National Planning Policy Framework (2021) - 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: (a) housing (including affordable housing), employment, retail, leisure and other commercial development; (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); (c) community facilities (such as health, education and cultural infrastructure); and (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation'. Yet in section 3 of 'Infrastructure Funding Requirements' there is no reference to any funding requirements for cultural infrastructure. The statement accompanying table 1 'indicates the full level of funding required for infrastructure within the authority, other funding streams may also contribute. The table simply shows items to which CIL could contribute and where there is as yet no other confirmed funding to fully cover their costs.' This would suggest that the Local Authority believes that there is no funding gap for cultural infrastructure within the City of York or that the City of York Council does not believe that CIL payments should be used for such a purpose which is at odds with NPPF guidance as quoted by the council themselves. Clearly the former is not correct as although York has a very vibrant and thriving independent cultural sector on which the city's visitor economy is predominantly based, the city's Culture Strategy (2020-2025) 'York's Creative Future' approved by the Council Executive has a key outcome to 'secure new funding to support culture'. The Community Infrastructure Levy could be a key component in enhancing the cultural infrastructure in the city creating opportunities for the Council to deliver its ambitions set out in the Draft Local Plan with regards to Cultural Provision and Cultural Wellbeing as set out in Policy D3 and other areas. We would strongly encourage the Council to include within the CIL Evidence Base and Infrastructure Funding Gap an assessment of the needs of the city's Cultural Infrastructure alongside the other forms of infrastructure that is covered. This would allow the Council to effectively consider how it can utilise the Community Infrastructure Levy to support Culture as one of the key infrastructure elements of the future of York.

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #47 –

COMPLETE

Started:	Friday, March 24, 2023 10:53:55 AM
Last Modified:	Monday, March 27, 2023 1:52:08 PM
Time Spent:	Over a day
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Christopher Jones

[redacted]

Contact details:

Organisation (optional)	Avison Young (on behalf of Homes England)
Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

See attached letter

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

See attached letter

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

See attached letter

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

See attached letter

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

See attached letter

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

N/A

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of

development, and if so, why?

N/A

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

N/A

Q22

9a. Do you have any other comments on the CIL evidence base?

N/A

[redacted]

From: [redacted]
Sent: 27 March 2023 11:57
To: [redacted]
Cc:
Subject: CIL consultation - Rapleys Representations on behalf of British Sugar
Attachments: Letter to [redacted] 27.03.2023 - signed.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

[redacted]

Further to our recent correspondence, please find enclosed our representations on behalf of British Sugar.
I will be grateful if you can confirm receipt.
Kind regards

[redacted]

BA (Hons) DipTP MRTPI AssocRICS
Consultant - Town Planning
Planning

[redacted]

***IMPORTANT**: From 1ST April 2023 Energy Performance Certificate (EPC) legislation changes significantly for non-domestic properties. Follow this link for more information*

Rapleys LLP
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RAPLEYS

[redacted]
Principal Strategic Planning Policy Officer
Strategic Planning Policy Team
City of York Council
West Offices
Station Rise
York
YO1 6GA

By email only to localplan@york.gov.uk

Our ref: NJ/1119/114/3
Date: 27 March 2023

Dear [redacted]

Re: City of York Council – Community Infrastructure Levy (CIL) Consultation 2023 – Representations on Behalf of British Sugar

We write on behalf of our client, British Sugar Plc, to submit representations to the above CIL consultation. Please therefore find enclosed with this letter our formal representations.

By way of background, British Sugar is the owner of the Former British Sugar site (the Site), Boroughbridge Road, York. The British Sugar site forms the substantial part of site ST1 (British Sugar / Manor School) in the draft Local Plan. The British Sugar site and Manor School Site, together, are identified within draft Policy SS6 to deliver approximately 1,200 dwellings as part of a residential led mixed use development, incorporating significant community and neighbourhood facilities.

British Sugar has worked with City of York Council (CYC) since the closure of the former British Sugar site in 2007 to progress its sustainable redevelopment for residential led mixed uses. British Sugar has secured outline and full planning permissions (see below) to enable the residential led mixed use development of the site and has recently commenced ground works on site.

- Outline planning permission (ref 15/00524/OUTM, Appeal Ref 3177821) for up to 1,100 residential units and associated community uses

- Full planning permission (ref 20/00774/FULM) for engineering works, remediation and reclamation of the Site

- Full planning permission (ref 17/01072/FUL) for the construction of access roads at Boroughbridge Road and Millfield Lane and across the Former Manor School site

British Sugar remains committed to the delivery of the redevelopment of the Site and continues to work closely with Officers at City of York Council accordingly.

We trust that these representations will be taken into account in the further preparation of the draft CIL charging schedule. We wish to be notified of future updates to CIL by the Council and wish to participate in the CIL examination. We also reserve the right to provide further information, including supporting viability evidence, at or in advance of the CIL Examination.

Yours sincerely,

[redacted]

[redacted]
BA (Hons)DipTP MRTPI AssocRICS
Consultant - Town Planning
[redacted]

City of York Community Infrastructure Levy Consultation Feb / Mar 2023

Representations on Behalf of British Sugar March 2023

The following representations are submitted by Rapleys on behalf of British Sugar and are provided as responses to the specific questions set out in the Council's CIL Consultation Response Form.

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule.

Do you have any comments on the content of the CIL Viability Study?

Response 1a:

1. Para 1.2 of the CIL Viability Study refers to the previous Local Plan and CIL viability testing undertaken by Peter Brett Associates 2017 and Porter PE in April 2018, and subsequent updates prepared for the local plan examination hearings. As acknowledged in para 1.2 of the Viability Study, these assessments focussed on viability testing the impacts of the draft Local Plan (rather than being prepared specifically for the purpose of informing a CIL tariff). Therefore, these assessments cannot be taken as robust evidence for the purpose of demonstrating the viability or otherwise of the proposed CIL tariffs.

2. It is important to note that Rapleys, on behalf of British Sugar, has previously made representations to the Peter Brett Associates 2017 assessment (in Rapleys Local Plan Reg 18 representations dated October 2017) which made it clear that British Sugar had signficant concerns in relation to the assessment evidence base, and that British Sugar was therefore unable to confirm any of the inputs or assumptions that may have been used in the cited site specific assessment. British Sugar did not therefore accept that the document provided a correct approach to valuation of the site, but rather, based on our detailed knowledge of the site, the conclusions and viability results shown in respect of the British Sugar site were not considered to be correct.

3. These concerns on the viability evidence base for the draft Local Plan in respect of the British Sugar site were reiterated within Rapleys Hearing Statements for the draft Local Plan examination process. In particular, Rapleys Phase 2 Hearing Statement for Matter 6 – Infrastructure Requirements, Delivery and Development Viability (Ref HS/P2/M6/IR/6) set out that *'with specific reference to the viability and delivery of the British Sugar site, there are extant planning permissions informed by a bespoke site-specific viability assessment which demonstrate that the assumptions adopted by the Council in the Plan viability testing for this particular site are not accurate, particularly in respect of site preparation costs'.*

4. Therefore, it is clear that prior evidence on viability was prepared not for the purposes of CIL assessment, but rather, to inform Local Plan viability. Moreover, Rapleys on behalf of British Sugar has documented in previous representations its concerns as to the accuracy of these Local Plan viability assessments with regard to the findings for the British Sugar site.

5. This is important, as it is understood that the British Sugar site, unlike other strategic sites, has not been specifically assessed, in terms of viability assessment, within the CIL Viability Study. Rather, as explained at Para 4.5 of the Viability Study, strategic sites are tested, *'except for where they have an agreed planning application.'* It is our understanding, based on discussions with Officers undertaken as part of the preparation of these representations, that the British Sugar site was not therefore specifically tested within the Viability Study on

the basis that it benefits from an existing planning permission for residential led development (and therefore officers have assumed that as a pre-CIL permission, this development will not be subject to the proposed CIL tariff).

6. However, Section 6 of the Viability Study (Residential Viability Testing Results) then provides the viability results of the 'typologies' and the tested Strategic Sites, to identify the financial ability, or otherwise, of particular types of development, or Strategic Sites, to pay a CIL charge. However, the British Sugar site is not specifically tested in any of these strategic site assessments. Nor does it fit within any of the listed typologies assessed (the largest brownfield site typology being '140 dwellings'). In this respect there is no typology or site-specific assessment of the British Sugar site undertaken for the purposes of the CIL Viability Study.

7. Notwithstanding the above, para 6.22 of the Viability Study concludes that *'there is scope of setting a residential CIL charge on all strategic sites in the emerging Local Plan. After allowing a healthy financial buffer in the headroom, CIL could be comfortably set at around £100 psm on a number of strategic sites, without threatening delivery of these tested sites'.* However, as demonstrated in the preceding paragraphs, there is no site specific assessment of the British Sugar site in the CIL Viability Assessment that would support this conclusion for the British Sugar site, and as also identified above, previous viability assessments prepared for the draft Local Plan cannot be relied on as evidence for the CIL tariff, in particular given the serious concerns raised in respect of these previous viability assessment by Rapleys in the course of the draft Local Plan consultation process

8. At Section 4 of the CIL Viability Study, Porter Economics set out the Tested Viability Assumptions adopted to carry out their typology testing. It is acknowledged in the report that *'It is not always possible to get a perfect fit between a site, the site profile and cost/revenue categories for every site likely to come forward within the CYC area. So, in line with national guidance, a best-fit approach is used by testing typologies that reflect allocated sites within the emerging Local Plan and typical windfall sites, based on generic development assumptions relevant to the local area'.*

9. In fact, for the British Sugar site, it is possible to consider the specific viability constraints affecting the site as they were considered in detail during the Public Inquiry for the outline permission and are set out in the Viability Review Mechanism within the s.106 Agreement that accompanies that permission. One of the primary viability considerations relevant to the British Sugar Site is the cost of remediation and site preparation costs. These are identified as the Master Developer Works in the s.106 at £54,999,132. These costs date back to 2017 and would need to be subject to build cost inflation to current date. Based on a site area of 39.83 hectares, the Master Developer Works equate to £1,308,846 per gross hectare or £2,134,230 based on the net developable area of 25.77 hectares (these are unindexed costs).

10. However, at para 4.46 of the CIL Viability Study, Porter Economics have adopted a generic site costs rate of £400,000 per net developable hectare for their typology testing. It is understood that on the basis that there is no site-specific assessment of the British Sugar Strategic Site in the CIL Viability Study, it is this generic site cost rate that has been applied. It is evident therefore that adopting the actual Master Developer Costs would erode any 'Headroom per CIL Liable SQM' that may have been assumed for the British Sugar site within the Council's evidence.

11. Para 6.22 of the Viability Study acknowledges that *'there should be exceptions for several major sites since the CIL rate could potentially place these large strategic sites at risk of*

non-delivery, and potentially undermine the emerging Local Plan. Also, these sites are already expected to support infrastructure investments that benefit the City through site specific s106 contributions.' These same justifications for exception apply wholeheartedly to the British Sugar site (ST1). The viability position for the British Sugar site is reflected in the bespoke viability review mechanism included within the s106 agreement associated with the approved outline planning permission for the development. This viability position reflects the commitment at the site to deliver significant social infrastructure that benefits the City through s106 contributions. In particular, the s106 agreement confirms that commitment, and contributions, for the delivery of the following social infrastructure, will be provided by the development:

- 2 x on site pre-schools
- 1 x on site primary school
- On site community / sports hall
- Community management organisation
- Secondary education contributions
- Offsite sport pitch improvements
- Local and strategic highways and infrastructure improvements

12. In summary therefore it is considered that the approach in the CIL viability study in respect of the British Sugar site is not a logical one, nor is it evidenced based, for the following reasons:

- The British Sugar site has not been specifically assessed within the CIL viability study, unlike other strategic sites.
- The site-specific viability assessments of the British Sugar site that have been undertaken for the Council previously (by Peter Brett and Porter Economics) were done primarily for the purposes of informing the draft Local Plan, rather than the proposed CIL charging schedule. Rapleys has documented the serious concerns with the robustness and accuracy of these assessments in their previous representations to the draft Local Plan.
- The justification given for not undertaking any site-specific viability assessment of the British Sugar site within the CIL Viability Study is that the site benefits from existing planning permissions (and therefore we understand that Officers have assumed that given these pre-CIL permissions, this scheme will not be CIL liable).
- Whilst it is accepted that there are arrangements in place for pre-CIL permissions, there remains the potential that amendments to the exiting permissions, or indeed fresh permissions, become necessary to ensure the further implementation and completion of the development at the British Sugar site. These permissions could become CIL liable.
- Despite not including any site specific assessment of the British Sugar site, the CIL Viability Study then fails to include it within the list of sites that where an exception is made. Rather, it is by default included with the strategic sites which would attract a CIL liability of £100 psm. However, there is no evidence contained within the CIL viability study to support this approach. Indeed as demonstrated in these representations, the

evidence on site preparation costs at the British Sugar site identifies that there would be no headroom to provide for CIL.

- Moreover, the justification for the identified 'exception' strategic sites in the charging schedule applies directly to the British Sugar site. Specifically, it is a large strategic site where the CIL rate could have an adverse impact on delivery and is a site that is supporting significant social infrastructure to the benefit of the City via a package of s106 obligations and contributions. These reasons for exception are therefore clearly applicable to the British Sugar site.

13. In this respect, it is considered that there is clear justification for the inclusion of the British Sugar Strategic Site (ST1) within the list of 'exception sites' that includes other strategic sites which are identified as having a £0 per sqm recommended charge in Table 8.1 of the Viability Study. The British Sugar site ST1 should therefore be included within this list of 'exception sites'.

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

1. No. As set out in our response to Q1 above, there is no site-specific CIL viability evidence prepared in respect of the British Sugar strategic site ST1. The Council's reasoning for this is that the site benefits from an existing planning permission.

2. However as currently drafted, the Draft Charging Schedule does not include site ST1 in the list of 'excluded' strategic sites, and therefore, should it become necessary to secure a new outline or full permission for the development of the ST1 site in future, it would be included with other strategic sites deemed capable of funding a £100psm rate for new residential floorspace within the Draft Charging Schedule, despite there being no relevant CIL viability assessment evidence to support or justify this position.

3. The British Sugar site will provide significant social infrastructure, and the specific viability arrangements associated with the delivery of the site (including this extensive social infrastructure) is reflected in the bespoke viability mechanisms included within the s106 obligations for the approved planning permission (Ref 15/00524/OUTM).

4. In this respect, it is considered that there is clear justification for the inclusion of the British Sugar Strategic Site (ST1) within the list of 'exception sites' that includes other strategic sites identified as having a £0 per square m. charge in the Draft Charging Schedule.

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

1. No. See response to Question 1a and 2a above.

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

1. Yes – see responses to Questions 1a, 2a above.

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

1. Yes – see responses to Questions 1a and 2 above.

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

1. We support the proposed agreement of project specific payment schedules for sites with overall CIL liabilities of £500,000 or more.

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations.

Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

1. N/A

8a. Do you have any other comments on the draft CIL Charging Schedule?

1. No

9a. Do you have any other comments on the CIL evidence base?

1. The Viability Study 2022 refers at para 1.2 to previous viability assessment work undertaken on behalf of the Council. As set out in our response to Question 1 above, this information was prepared for the purpose of informing the draft Local Plan, and not specifically prepared for the purposes of informing the CIL Charging Schedule. In particular, reference is made to the 'City of York Local Plan Viability Update Addendum' (Ref HS/P2/M6/IR/1b App 2). This document was prepared on behalf of the Council during the Local Plan Examination and included an assessment of the impact of changes to the draft Local Plan that had taken place since the publication of the Porter 2018 sites, assessing the strategic sites (including British Sugar). It is noted that this document was prepared for the purposes of the Local Plan rather than the CIL consultation. In addition, consistent with Rapleys previous representations to the Local Plan viability evidence base (cited in our response to question 1a above) it is not accepted that this document provides a correct approach to valuation of the British Sugar site, but rather, based on our detailed knowledge of the site, the conclusions and viability results shown in respect of the British Sugar site are not considered to be accurate. For this reason, this Local Plan evidence base material cannot be relied upon for the purposes of preparing the draft CIL Charging Schedule.

Letter to [redacted] NJ 27.03.2023

Final Audit Report 2023-03-27

Created:	2023-03-27
By:	[redacted]
Status:	Signed
Transaction ID:	CBJCHBCAABAAVoRJ8rjBZ93ZP-zJTuSmDW7NDXFRDWtz

"Letter to [redacted] NJ 27.03.2023" History

Document created by [redacted]
2023-03-27 - 10:32:52 AM GMT- IP address: 91.240.17.58

Document emailed to [redacted] for signature
2023-03-27 - 10:33:20 AM GMT

Email viewed by [redacted]
2023-03-27 - 10:50:45 AM GMT- IP address: 188.190.121.233

Signer [redacted]
2023-03-27 - 10:51:18 AM GMT- IP address: 136.144.99.35

Document e-signed by [redacted]
Signature Date: 2023-03-27 - 10:51:20 AM GMT - Time Source: server- IP address: 136.144.99.35

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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #48 –

COMPLETE

Started:	Monday, March 27, 2023 1:59:41 PM
Last Modified:	Monday, March 27, 2023 2:57:15 PM
Time Spent:	00:57:33
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Tim Waring

[redacted]

Contact details:

Organisation (optional)	Quod Ltd
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Yes; please refer to attached correspondence (Quod) and report (Bidwells).

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

No; please refer to the attached correspondence (Quod) and report (Bidwells).

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

No; please refer to the attached correspondence (Quod) and report (Bidwells).

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Yes; please refer to the attached correspondence (Quod) and report (Bidwells).

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Yes; please refer to the attached correspondence (Quod) and report (Bidwells).

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

No; please refer to the attached correspondence (Quod) and report (Bidwells).

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

No; please refer to the attached correspondence (Quod) and report (Bidwells).

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Yes; please refer to the attached correspondence (Quod) and report (Bidwells).

Q22

9a. Do you have any other comments on the CIL evidence base?

Yes; please refer to the attached correspondence (Quod) and report (Bidwells).

Our ref: Q70385/tw/gl
Your ref:
Email: [redacted]
Date: 27 March 2023

CIL Consultation
City of York Council
West Offices
Station Rise
York
YO1 6GA

For the attention of Strategy Planning Policy Team

By Email

Dear Strategy Planning Policy Team

Draft Community Infrastructure Levy – City of York Council (February 2023) Representations on behalf of Oakgate Group Ltd ("Oakgate")

Quod, acting on behalf of Oakgate, make the following representations to City of York Council's ("CYC") Community Infrastructure Levy ("CIL") Draft Charging Schedule ("DCS").

Oakgate are an investor and developer in York, and have concerns of the implications of CIL on the delivery of new housing in the City, and most specifically, the various schemes they are currently promoting, including those at Mount Royale Hotel, Tramway Working Men's Club and the York Motor Sports Village.

Oakgate's Case - Summary

Notably, Oakgate's concerns relate to the ability of residential development in the City to sustain the CIL charge proposed in the DCS.

The DCS proposes a charge of £200 per sqm levied on all residential developments across York, regardless of their location. It is demonstrated below that it is not appropriate to impose a blanket CIL charge across the City for new homes, but that differential CIL rates should be applied in different parts of the City given the differing market circumstances across York.

These representations are supported by a Report by Bidwells on the viability evidence base underpinning the CIL DCS.

Oakgate wish to work with CYC (and their advisors PPE) to determine a more appropriate DCS for residential across the City.

Guidance of Setting CIL Rates

Government guidance on setting CIL rates is contained in the Community Infrastructure Levy Guidance (updated January 2023) ("CIL Guidance") which notes that when deciding the Levy rates, a Local Planning Authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments[1]. It goes on to note that they should show how "*their proposed levy rate will contribute towards the implementation of their relevant plan and supporting development across their area*". In this case, the relevant Local Plan will be in the York Local Plan, which is currently at Regulation 19 stage, and has been the subject of examination and is presently subject to draft Proposed Main Modifications (consultation of these rungs until today). It is anticipated that the Local Plan will be adopted later this year.

The CIL Guidance refers to the Regulations, and specifically notes that differential rates can be applied in a flexible way, to ensure that viability of development is not put at risk[2].

The National Planning Policy Guidance ("PPG") (which supports the NPPF) states that:

"Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the Plan"[3].

Chiming with the advice of the CIL Guidance, the PPG notes that there is a necessary balance at the centre of the charge setting process, and it is an obligation of the charging authority that:

"…in meeting the regulatory requirements, charging authorities should be able to show and explain how their proposed levy rate (or rates) will contribute toward the implementation of their relevant plan and support development across their area (see Regulation 14(i) as amended by the 2014 Regulations)"[4].

Both sets of Guidance clearly recognise that differential rates should be applied in certain circumstances in order that the viability of development is not put at risk, and that the Local Plan can be implemented.

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[1] Paragraph: 010 reference ID: 25-010-2019-09-01.
[2] Paragraph: 022 reference ID: 25-022-2019-09-01.
[3] Paragraph: 002 reference ID: 10-002-2019-05-09.
[4] Paragraph: 010 reference ID: 25-010-2019-09-01.

The Local Plan Strategy

The City of York Local Plan (Regulation 19) sets out its key vision, for the City which "*…aspires to be a City who's special qualities and distinctiveness are recognised worldwide…*" and that in order to do so, the Local Plan aims to "*deliver sustainable patterns and forms of development to support this ambition and the delivery of the City's economic, environmental and social objectives…*".

In order to meet these objectives, it is recognised[5] that there needs to be a "*continuous supply of housing opportunities through the Plan period, and that sustainable sites should be brought forward in order to deliver of the vision of providing good quality homes and opportunities".* It is recognised in the same paragraph of the Local Plan that it is essential that sites shall be identified for housing development, which are both "*viable and deliverable*".

In summary, the Local Plan's vision will require careful consideration of viability, to ensure that housing development is deliverable through the City, and that the City can achieve their overall aim of providing good quality homes and opportunities in order to meet their aspiration of being a City that is recognised worldwide.

Underpinning the CIL DCS is the City of York CIL Viability Study (December 2022) (Porter Planning Economics – PPE). The attached report by Bidwells notes that the Viability Study adopts a relatively conventional approach to viability testing, whereby a series of development appraisals or scheme typologies are tested in order to determine whether they are capable of sustaining CIL payment.

Whilst Bidwells do not challenge the general methodology that PPE have adopted, they demonstrate that the evidence base on which the viability is assessed is unsound, and not appropriate for testing the viability of residential across the whole City.

The Viability Case

Notably, Bidwells demonstrate that there is a wide variation in sales values across the City, which in turn demonstrates that there are strong grounds for adopting a differential rate to CIL charging for residential in different parts of the City.

Notably, the evidence suggests that differential rates should be applied in a flexible way, across the City, rather than a blanket rate for all new residential regardless of location.

The Bidwells report demonstrates that there is clear evidence of geographical differences in sales values in York, and that the evidence presented by PPE, involves a narrow set of samples, relating only to new build property.

[5] Paragraph 2.5 of the Local Plan.

Bidwells demonstrate that there are distinctly different value areas within York, and that applying a blanket rate would render schemes unviable. As CIL rates are mandatory payments, the consequence is that other Section 106 requirements (such as affordable housing) will be the subject of reduced levels of contribution (ie, below policy target levels).

Therefore, even if it is proven to be viable to deliver new homes subject to CIL, but without Section 106 contributions, the Plan's objectives of providing a broad range of homes for all, and especially the need to provide affordable homes for which there is an acute need, will render the Plan in capable of delivering on one of its key aims.

Conclusion

In view of the above, Oakgate would wish to work with CYC and their advisors, to determine a more appropriate approach to CIL charging for residential uses across the City. We would hope to work positively with CYC to ensure that the policy requirements can be implemented, and development is both incentivised and accelerated within the City.

Oakgate are keen to work with CYC, to address these issues before the charging schedule is submitted for Examination.

In the meantime, Oakgate however, reserve the right to be represented at the Examination Hearing into the CIL DCS.

Yours sincerely

[redacted]

Enc

City of York CIL Consultation
March 2023

BIDWELLS

REPRESENTATIONS ON THE VIABILITY EVIDENCE BASE ON BEHALF OF OAKGATE GROUP LIMITED

Table of Contents

1.0 Introduction

1.1 Bidwells is instructed Oakgate Group Limited ("Oakgate") to review the viability evidence base that has recently been published by City of York Council ("CYC" or "the Council") to support the current consultation that is being carried out regarding the potential implementation of a Community Infrastructure Levy ("CIL").

1.2 Bidwells has advised Oakgate and their parent company Caddick Group on viability issues on several sites over a number of years. Bidwells has been asked by Oakgate to consider the implications of the proposed introduction of CIL on development schemes in York, specifically sites at Mount Royale Hotel, Tramway Working Men's Club, and the York Motorsports Village.

1.3 These representations comment on the general approach to viability testing taken by PPE, and the analysis of the ability of residential development in the City to sustain the level of CIL charge that is recommended, and finally our conclusions as to whether the level of CIL that is proposed is justified and supported by evidence.

2.0 General Approach to Viability Testing

2.1 The report prepared by PPE as the evidence base for the CIL consultation follows a relatively conventional approach. It carries out a series of development appraisals of scheme typologies which test whether these typologies would be capable of sustaining a CIL payment, and if so, at what level. The document concludes by advising levels of CIL which could viably be levied on different use types on different schemes within the CYC area.

2.2 The bulk of PPE's analysis focuses on a series of residential development typologies which although not specific to any particular scheme, reflect the type and character of schemes that might be delivered within the CYC area.

2.3 These typologies include greenfield and brownfield schemes in rural, city centre, urban and suburban locations, as well as large, medium and small size schemes. The use of typologies is generally supported, and we agree that the typologies analysed reflect the form of development that is likely to come forward in York over the plan period.

2.4 In addition to the generic residential typologies described above, PPE has carried out an analysis of the major strategic sites in York which are set out in the emerging Local Plan.

2.5 In addition to the conventional residential typologies and site-specific analysis above, PPE also considers the impact of CIL on older persons accommodation including retirement dwellings and extra care accommodation.

2.6 Finally, PPE looks at non-residential development including town centre offices, business parks, industrial/warehousing, convenience and comparison retail, supermarkets, hotels, student accommodation and care homes.

2.7 We agree that the approach taken by PPE is in line with that advocated generally by the NPPG.

3.0 Requirement to Strike an Appropriate Balance

3.1 At paragraph 2.15 of the CIL Viability Study, PPE recites the Regulation 14 of the 2014 CIL Regulations which requires a charging authority (CYC in this case) to:

"…strike…an appropriate balance between:

The desirability of funding from CIL (in whole or part) the…cost of infrastructure required to support the development of its area…; and

The potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area."

3.2 At paragraph 2.20 of the CIL Viability Study, PPE quotes the PPG regarding the high-level (i.e. non-site specific) nature of the assessment:

"A charging authority should use an area-based approach, involving a broad test of viability across their area, as the evidence base to underpin their charge. The authority will need to be able to show why they consider that the proposed levy rate or rates set an appropriate balance between the need to fund infrastructure and the potential implications for the viability of development across their area."

3.3 At paragraph 2.21 of the Study, PPE quotes the PPG stating that when a CIL schedule is subjected to public examination, the Inspector much ensure that:

"…evidence has been provided that shows the proposed rate or rates would not undermine the deliverability of the plan."

3.4 PPE's report considers whether and to what extent CIL could viably be levied on each use and development typology.

4.0 Approach to Testing the Viability of Residential Development

4.1 Each residential development, strategic site, and non-residential development typology analysis is in the form of a development appraisal. A development appraisal considers the revenues that a development scheme could generate, and then deducts the costs of delivering that development, including developers profit. The resultant figure is the residual land value ("RLV")and indicates how much a rational purchaser would be willing to pay for a site to deliver the scheme that is tested.

4.2 This residual land value is then compared to a Benchmark Land Value ("BLV") and if the RLV exceeds (i.e., is greater than) the BLV then it can be considered viable and there is scope (referred to as "headroom" by PPE) for CIL to be charged.

4.3 We agree with the general methodology that PPE has taken to analysing the ability of residential development to support a CIL levy, although disagree with the evidence base on which their analysis of sales values has been based.

5.0 Approach to Assessing Sales Values for Residential Development

5.1 In seeking to determine an appropriate sales value for residential units in their analysis, PPE has reviewed transactional evidence from HM Land Registry, and identified 10,670 relevant residential sales between January 2019 and May 2022. Of these, PPE has identified that 449 were for new build properties, of which 280 are houses and 159 are flats.

5.2 As the transactions occur at various points over the period, PPE has then correctly indexed these transactions to August 2022 to give average sales values of £4,200 psm (£390 psf) for houses and £5,335 psm (£496 psf) for flats. This is set out at paragraphs 3.17 to 3.22 of their report.

5.3 At paragraph 3.22, PPE states:

"Across the CYC area, the achieved sales values show little in the way of clearly defined locations, where there are significantly different sales values that could necessitate a requirement for different CIL rates. The conclusion from this analysis is that there is not sufficient evidence to support an approach where multiple value areas are considered."

5.4 In table 4.8 PPE sets out the rates that they have tested being the averages of £4,200 psm for houses and £5,335 psm for flats, as discussed above.

5.5 The evidence of new build residential transactions is set out in Appendix B of PPE's report. We note that the 448 new build transactions upon which PPE has based its sales values for testing represent only 4.2% of the total 10,670 transactions that they identified.

5.6 It is accepted that only actual evidence can be considered, but in our opinion, it is wrong to apply zero weight to the evidence of more than 95% of residential transactions that happened over the sample period.

5.7 Looking more closely at the evidence of new build flat transactions, aside from being a small proportion of the total transactions, is contained on only four main postcode areas. Whilst this is clearly as a result of new build developments being located only in these areas, it also fails to reflect values in other parts of the City where development has not happened, but to which CIL would apply.

5.8 Of the 55 new build flat transactions listed in Appendix B, 27 (49%) are located in the YO1 postcode and 23 (42%) are located in the YO31 postcode. This data distribution skews the average flat value and therefore PPE's conclusion that there is no discernible difference in sales values across the City that would justify multiple value areas.

6.0 Analysis of Values in Areas Surrounding the Oakgate Sites

6.1 In order to illustrate the difference in values across the City, including areas where no newbuilds have occurred we have reviewed HM Land Registry data for all property transactions within a radius of the sites as per the table below:

SITE	RADIUS OF SEARCH	NUMBER OF TRANSACTIONS	AVERAGE VALUE (REBASED TO AUGUST 2022)	DIFFERENCE TO PPE ADOPTED VALUE FOR FLATS OF £5,335 PSM,
Mount Royale Hotel, YO24 1GU	0.25 miles	66 (Flats only)	£5,100psm (£474psf)	-£235psm
Tramways WMC, YO1 9PY	0.25 miles	128 (flats only)	£4,591psm (£427psf)	-£745psm
York Motor Sports Village, YO32 9JS	0.5 miles	187 (houses and flats)	£3,889psm (£361psf) – (houses and flats)	-£1,446psm
		8 (Flats only)	£2,999psm (£279psf)	-£2,336psm

6.2 A search radius of 0.25 miles has been adopted for both the Mount Royale Hotel and Tramways WMC, as this gives a significant amount of comparable evidence of flat sales.

6.3 Due to the lack of comparable sales around the York Motor Sports Village a wider search radius of 0.5 miles has been adopted, and houses have been included in the same data set due to the limited number of flat sales.

6.4 A copy of the data is included as Annex 1 to these representations.

6.5 The sales value adopted for flat sales in the PPE CIL analysis is £5,335psm. As can be seen from the table above, in each area analysed, the average sales value falls below this. Furthermore, in each case the difference is greater than the CIL Levy for residential development within the City of York that is recommended by PPE in their report.

6.6 We consider therefore that PPE's statement at paragraph 3.22 of their report is incorrect as there is clear evidence (albeit from resale rather than solely newbuild sales) that there are distinctly different value areas within York and that consideration should be given to applying differential rates of CIL on a geographical basis within the City.

7.0 Conclusions

7.1 Whilst we support the approach that PPE have taken to analysing residential development schemes in the City of York, we disagree with the sales data sample that has been adopted.

7.2 PPE's sample includes sales from a narrow set of new build property which form less than 5% of the sales transactions in York over the sample period. PPE takes no account of resale sales which form the vast majority of sales.

7.3 Based on the new build sample data, PPE concludes that there are no significantly different sales values across the City, and accordingly there is no merit in recommending varied levels of CIL across the City. We disagree with this conclusion.

7.4 As our own analysis shows, once resale transactions are considered, there are significant differences in value across the City. Accordingly, we disagree with PPE's recommendation that a CIL charge of £200 per sq metre should be levied on all residential development across within York.

7.5 The adoption of a levy at the level suggested by PPE would render many schemes unviable, leading to time-consuming scheme-by-scheme viability negotiations and the inevitable delivery of affordable housing and other planning gain at levels below those sought by the Council in planning policy.

7.6 In order to identify appropriate levels of CIL, we consider that PPE should analyse sales data in more detail, including resale data, and consider applying differential rates of CIL reflecting the clear multiple value areas that exist across the City of York.

7.7 Bidwells and Oakgate appreciate the challenges of the exercise that PPE and CYC are undertaking regarding the introduction of a CIL and would be pleased to work with them to assist them in developing the evidence base to allow a robust and appropriate levy to be adopted.

APPENDIX 1
RESIDENTIAL TRANSACTIONS

Mount Royale Hotel YO24 1GU
Transactions within 0.25 miles
January 2019 - August 2022

Reference	Address	Date sold	Sold price	Estimated market value	New build?	Subcategory	Floor area ft²	Price per ft²	Market price per ft² (Dec 2022)	Tenure
1	1, Ambassador Court, The Mount, York, York YO24 1DU	08/04/2022	£ 270,000	£ 293,061	No	Flat	1,066	£ 253	£ 275	Leasehold
2	131, The Mount, York, York YO24 1DU	31/03/2022	£ 425,000	£ 468,518	No	Flat	1,152	£ 369	£ 407	Leasehold
3	Flat 4, Grasmead House, 1, Scarcroft Hill, York, York YO24 1DF	25/02/2022	£ 282,500	£ 307,129	No	Flat	614	£ 460	£ 501	Leasehold
4	Flat 5, St. Catherines Court, Holgate Road, York, York YO24 4BY	14/02/2022	£ 139,000	£ 151,118	No	Flat	269	£ 517	£ 562	Leasehold
5	Flat 19, Langton Court, Scarcroft Road, York, York YO24 1BF	17/12/2021	£ 205,000	£ 221,851	No	Flat	667	£ 307	£ 332	Leasehold
6	4, Cambridge Mews, York, York YO24 4BU	10/12/2021	£ 108,000	£ 116,878	No	Flat	441	£ 245	£ 265	Leasehold
7	Flat 3, 78, Holgate Road, York, York YO24 4AB	14/10/2021	£ 200,000	£ 222,002	No	Flat	840	£ 238	£ 264	Leasehold
8	4, Ambassador Court, The Mount, York, York YO24 1DU	30/09/2021	£ 230,000	£ 259,539	No	Flat	807	£ 285	£ 321	Leasehold
9	6, Holgate Road, York, York YO24 4AB	24/08/2021	£ 177,000	£ 198,351	No	Flat	624	£ 284	£ 318	Leasehold
10	17, Mill Mount Lodge, Mill Mount, York, York YO24 1BG	06/08/2021	£ 210,000	£ 235,332	No	Flat	624	£ 336	£ 377	Leasehold
11	12, Catesby House, Cambridge Street, York, York YO24 4AS	04/08/2021	£ 128,500	£ 144,001	No	Flat	506	£ 254	£ 285	Leasehold
12	Flat 20, St. Catherines Court, Holgate Road, York, York YO24 4BY	09/07/2021	£ 152,500	£ 168,617	No	Flat	392	£ 389	£ 430	Leasehold
13	Flat 18, The Walk, Holgate Road, York, York YO24 4EL	30/06/2021	£ 178,000	£ 195,341	No	Flat	560	£ 318	£ 349	Leasehold
14	Flat 3, 1, Holgate Road, York, York YO24 4AA	30/06/2021	£ 170,000	£ 186,561	No	Flat	753	£ 226	£ 248	Leasehold
15	48, Nunthorpe Avenue, York, York YO23 1PF	30/06/2021	£ 165,000	£ 181,074	No	Flat	495	£ 333	£ 366	Leasehold
16	Apartment 1, Kirk House, Mill Mount, York, York YO24 1AG	23/06/2021	£ 455,000	£ 499,326	Yes	Flat	1,238	£ 368	£ 403	Leasehold
17	Flat 3, Grasmead House, 1, Scarcroft Hill, York, York YO24 1DF	14/06/2021	£ 290,000	£ 318,252	No	Flat	678	£ 428	£ 469	Leasehold
18	65, Holgate Road, York, York YO24 4AA	10/06/2021	£ 3,300,000	£ 3,794,633	No	Flat	538	£ 6,132	£ 7,051	Freehold
19	4, Stone Court, Dalton Terrace, York, York YO24 4EJ	04/06/2021	£ 155,000	£ 170,100	No	Flat	495	£ 313	£ 344	Leasehold
20	Apartment 3, Kirk House, Mill Mount, York, York YO24 1AG	27/05/2021	£ 530,000	£ 581,946	Yes	Flat	1,518	£ 349	£ 383	Leasehold
21	2, The Crescent, York, York YO24 1AW	10/05/2021	£ 750,000	£ 867,552	No	Flat	484	£ 1,548	£ 1,791	Freehold
22	1, The Crescent, York, York YO24 1AW	10/05/2021	£ 850,000	£ 983,225	No	Flat	527	£ 1,612	£ 1,864	Freehold
23	Flat 2, 2, Driffield Terrace, York, York YO24 1EJ	23/04/2021	£ 410,000	£ 457,075	No	Flat	366	£ 1,120	£ 1,249	Leasehold
24	Apartment 8, Kirk House, Mill Mount, York, York YO24 1AG	25/02/2021	£ 375,000	£ 430,728	Yes	Flat	915	£ 410	£ 471	Leasehold
25	Apartment 9, Kirk House, Mill Mount, York, York YO24 1AG	22/02/2021	£ 450,000	£ 516,874	Yes	Flat	1,249	£ 360	£ 414	Leasehold
26	96, Holgate Road, York, York YO24 4BB	04/02/2021	£ 275,000	£ 315,868	No	Flat	1,399	£ 197	£ 226	Leasehold
27	Apartment 4, Kirk House, Mill Mount, York, York YO24 1AG	26/01/2021	£ 310,000	£ 353,659	Yes	Flat	872	£ 356	£ 406	Leasehold
28	Apartment 10, Kirk House, Mill Mount, York, York YO24 1AG	22/12/2020	£ 475,000	£ 545,401	Yes	Flat	1,259	£ 377	£ 433	Leasehold
29	Flat 3, 2, Driffield Terrace, York, York YO24 1EJ	18/12/2020	£ 380,000	£ 436,321	No	Flat	1,066	£ 357	£ 409	Leasehold
30	Car Parking Space 6, The Walk, Holgate Road, York, York YO24 4EL	18/12/2020	£ 185,000	£ 225,484	No	Flat	657	£ 282	£ 343	Leasehold
31	Flat 46, The Walk, Holgate Road, York, York YO24 4EL	18/12/2020	£ 185,000	£ 212,419	No	Flat	614	£ 302	£ 346	Leasehold
32	Apartment 20, Kirk House, Mill Mount, York, York YO24 1AG	11/12/2020	£ 395,000	£ 453,544	Yes	Flat	1,163	£ 340	£ 390	Leasehold
33	Flat 2, 1, Holgate Road, York, York YO24 4AA	11/12/2020	£ 167,500	£ 192,326	No	Flat	689	£ 243	£ 279	Leasehold
34	Apartment 22, Kirk House, Mill Mount, York, York YO24 1AG	04/12/2020	£ 372,500	£ 427,709	Yes	Flat	1,227	£ 304	£ 349	Leasehold
35	Apartment 11, Kirk House, Mill Mount, York, York YO24 1AG	04/12/2020	£ 525,000	£ 602,811	Yes	Flat	1,345	£ 390	£ 448	Leasehold
36	16, Watson Street, York, York YO24 4BH	04/12/2020	£ 140,000	£ 160,750	No	Flat	377	£ 372	£ 427	Leasehold
37	Apartment 16, Kirk House, Mill Mount, York, York YO24 1AG	27/11/2020	£ 540,000	£ 626,449	Yes	Flat	1,367	£ 395	£ 458	Leasehold
38	Apartment 15, Kirk House, Mill Mount, York, York YO24 1AG	03/11/2020	£ 485,000	£ 562,644	Yes	Flat	1,367	£ 355	£ 412	Leasehold
39	5, Stone Court, Dalton Terrace, York, York YO24 4EJ	30/10/2020	£ 277,000	£ 328,969	No	Flat	689	£ 402	£ 478	Leasehold
40	Apartment 17, Kirk House, Mill Mount, York, York YO24 1AG	20/10/2020	£ 375,000	£ 445,355	Yes	Flat	947	£ 396	£ 470	Leasehold
41	Apartment 18, Kirk House, Mill Mount, York, York YO24 1AG	13/10/2020	£ 450,000	£ 534,426	Yes	Flat	1,033	£ 435	£ 517	Leasehold
42	Apartment 12, Kirk House, Mill Mount, York, York YO24 1AG	13/10/2020	£ 405,000	£ 480,983	Yes	Flat	1,055	£ 384	£ 456	Leasehold
43	Apartment 14, Kirk House, Mill Mount, York, York YO24 1AG	13/10/2020	£ 445,000	£ 528,487	Yes	Flat	1,281	£ 347	£ 413	Leasehold
44	Flat 6, Langton Court, Scarcroft Road, York, York YO24 1BF	11/09/2020	£ 215,000	£ 258,106	No	Flat	893	£ 241	£ 289	Leasehold
45	Flat 7, Langton Court, Scarcroft Road, York, York YO24 1BF	24/07/2020	£ 200,000	£ 238,184	No	Flat	710	£ 282	£ 335	Leasehold
46	Flat 4, 69, The Mount, York, York YO24 1AX	22/06/2020	£ 135,000	£ 160,431	No	Flat	422	£ 320	£ 380	Leasehold
47	Flat 15, The Walk, Holgate Road, York, York YO24 4EL	01/05/2020	£ 169,950	£ 200,665	No	Flat	527	£ 322	£ 380	Leasehold
48	125, The Mount, York, York YO24 1DU	04/02/2020	£ 645,000	£ 766,875	No	Flat	3,132	£ 206	£ 245	Leasehold
49	Flat 1, St. Catherines Court, Holgate Road, York, York YO24 4BY	29/01/2020	£ 157,500	£ 187,108	No	Flat	527	£ 299	£ 355	Leasehold
50	8, Mount Court, York, York YO24 4AA	29/01/2020	£ 159,995	£ 190,072	No	Flat	629	£ 255	£ 302	Leasehold
51	Flat 3, St. Catherines Court, Holgate Road, York, York YO24 4BY	20/12/2019	£ 165,000	£ 198,417	No	Flat	538	£ 307	£ 369	Leasehold
52	4, Mount Court, York, York YO24 4AA	28/11/2019	£ 150,000	£ 178,605	No	Flat	603	£ 249	£ 296	Leasehold
53	34, Nunthorpe Avenue, York, York YO23 1PF	28/11/2019	£ 144,000	£ 171,461	No	Flat	506	£ 285	£ 339	Leasehold
54	30, Oliver Mews, York, York YO24 4DA	20/08/2019	£ 186,000	£ 217,790	No	Flat	565	£ 329	£ 385	Leasehold
55	Flat 11, Langton Court, Scarcroft Road, York, York YO24 1BF	08/08/2019	£ 215,000	£ 251,747	No	Flat	764	£ 281	£ 329	Leasehold
56	4, St James Mount, York, York YO23 1EL	19/07/2019	£ 220,000	£ 260,947	No	Flat	797	£ 276	£ 328	Freehold
57	82, Holgate Road, York, York YO24 4AB	24/06/2019	£ 655,000	£ 777,999	No	Flat	2,217	£ 295	£ 351	Freehold
58	Flat 48, The Walk, Holgate Road, York, York YO24 4EL	17/05/2019	£ 215,000	£ 255,758	No	Flat	560	£ 384	£ 457	Leasehold
59	Flat 25, The Walk, Holgate Road, York, York YO24 4EL	18/04/2019	£ 210,000	£ 246,941	No	Flat	527	£ 398	£ 468	Leasehold
60	5, Mill Mount Lodge, Mill Mount, York, York YO24 1BG	19/02/2019	£ 490,000	£ 575,498	No	Flat	1,216	£ 403	£ 473	Leasehold
61	Flat 2, Grasmead House, 1, Scarcroft Hill, York, York YO24 1DF	14/02/2019	£ 255,000	£ 299,494	No	Flat	743	£ 343	£ 403	Leasehold
62	3, Driffield Terrace, York, York YO24 1EJ	07/01/2019	£ 850,000	£ 1,126,243	No	Flat	1,066	£ 798	£ 1,057	Freehold
63	54, Nunthorpe Avenue, York, York YO23 1PF	04/08/2022	£ 285,000	£ 288,177	No	Flat	786	£ 363	£ 367	Leasehold
64	59, Blossom Street, York, York YO24 1AZ	15/07/2022	£ 525,000	£ 528,393	No	Flat	1,453	£ 361	£ 364	Leasehold
65	8, Cambridge Mews, York, York YO24 4BU	19/08/2020	£ 105,000	£ 126,265	No	Flat	291	£ 361	£ 434	Leasehold
66	8, St James Mount, York, York YO23 1EL	23/10/2019	£ 220,000	£ 258,442	No	Flat	861	£ 255	£ 300	Freehold
Total / Average		**66**	**£ 23,564,945**	**£ 27,166,307**			**56,559**	**£ 417**	**£ 480**	

Dec-22	154.23
Aug-22	152.13
Change	**1.36%**

	Total	**£psf**	**£psm**
Average Sale Price (Dec 22)	£ 27,166,307	£ 480	£ 5,170
Average Sale Price (Aug 22)	£ 26,796,410	£ 474	£ 5,100

Tramways WMC YO1 9PY
Transactions within 0.25 miles
January 2019 - August 2022

Reference	Address	Date sold	Sold price	Estimated market value	New build?	Subcategory	Floor area ft²	Price per ft²	Market price per ft² (Dec 2022)	Tenure
1	16, Cocoa Suites, Navigation Road, York, York YO1 9AE	22/11/2019	£ 135,000	£ 160,744	Yes	Flat	280	£ 482	£ 574	Leasehold
2	2, Little Kent Mews, York, York YO10 4EP	13/07/2021	£ 123,000	£ 135,999	No	Flat	291	£ 423	£ 468	Leasehold
3	19, Cocoa Suites, Navigation Road, York, York YO1 9AE	03/12/2019	£ 140,000	£ 168,354	Yes	Flat	291	£ 482	£ 579	Leasehold
4	47, Cocoa Suites, Navigation Road, York, York YO1 9AE	14/01/2022	£ 176,000	£ 192,354	No	Flat	301	£ 584	£ 638	Leasehold
5	15, Cocoa Suites, Navigation Road, York, York YO1 9AE	25/11/2021	£ 185,000	£ 201,600	No	Flat	301	£ 614	£ 669	Leasehold
6	48, Cocoa Suites, Navigation Road, York, York YO1 9AE	30/09/2021	£ 170,000	£ 198,249	No	Flat	301	£ 564	£ 658	Leasehold
7	44, Fishergate, York, York YO10 4AB	15/01/2020	£ 103,000	£ 122,362	No	Flat	301	£ 342	£ 406	Leasehold
8	20, Cocoa Suites, Navigation Road, York, York YO1 9AE	03/12/2019	£ 140,000	£ 168,354	Yes	Flat	301	£ 465	£ 559	Leasehold
9	30, Cocoa Suites, Navigation Road, York, York YO1 9AE	16/05/2022	£ 189,000	£ 200,449	No	Flat	312	£ 605	£ 642	Leasehold
10	25, Cocoa Suites, Navigation Road, York, York YO1 9AE	16/07/2020	£ 157,500	£ 187,570	No	Flat	312	£ 505	£ 601	Leasehold
11	3, Cocoa Suites, Navigation Road, York, York YO1 9AE	03/02/2021	£ 165,000	£ 189,521	No	Flat	334	£ 494	£ 568	Leasehold
12	10, Victoria Apartments, 2, Heslington Road, York, York YO10 5AT	18/02/2022	£ 130,000	£ 141,334	No	Flat	344	£ 377	£ 410	Leasehold
13	58, Cocoa Suites, Navigation Road, York, York YO1 9AE	17/09/2021	£ 180,000	£ 203,117	No	Flat	344	£ 523	£ 590	Leasehold
14	6, Cocoa Suites, Navigation Road, York, York YO1 9AE	12/03/2021	£ 192,500	£ 216,837	No	Flat	344	£ 559	£ 630	Leasehold
15	17, Cocoa Suites, Navigation Road, York, York YO1 9AE	31/01/2020	£ 185,000	£ 219,777	Yes	Flat	344	£ 537	£ 638	Leasehold
16	12a, Cocoa Suites, Navigation Road, York, York YO1 9AE	17/01/2020	£ 145,000	£ 172,258	Yes	Flat	344	£ 421	£ 500	Leasehold
17	12, Cocoa Suites, Navigation Road, York, York YO1 9AE	08/11/2019	£ 155,000	£ 184,558	Yes	Flat	344	£ 450	£ 536	Leasehold
18	55, Cocoa Suites, Navigation Road, York, York YO1 9AE	15/02/2022	£ 175,000	£ 193,347	No	Flat	355	£ 493	£ 544	Leasehold
19	12, Escrick Street, York, York YO10 4AW	21/02/2022	£ 150,000	£ 163,077	No	Flat	398	£ 377	£ 409	Leasehold
20	58, Fishergate, York, York YO10 4AB	16/09/2021	£ 167,000	£ 188,448	No	Flat	398	£ 419	£ 473	Leasehold
21	16, Covent House, George Street, York, York YO1 9QE	14/01/2021	£ 105,000	£ 119,788	No	Flat	441	£ 238	£ 271	Leasehold
22	8, Strand House, Dixon Lane, York, York YO1 9QY	25/11/2020	£ 165,000	£ 191,415	No	Flat	441	£ 374	£ 434	Leasehold
23	15, Covent House, George Street, York, York YO1 9QE	16/08/2021	£ 136,000	£ 152,405	No	Flat	452	£ 301	£ 337	Leasehold
24	Apartment 32, Bellerby Court, Palmer Lane, York, York YO1 7AF	18/02/2020	£ 195,000	£ 231,846	No	Flat	452	£ 431	£ 513	Leasehold
25	14, Cocoa Suites, Navigation Road, York, York YO1 9AE	15/11/2019	£ 177,000	£ 210,754	Yes	Flat	452	£ 392	£ 466	Leasehold
26	2, The Gatehouse, Dixons Yard, York, York YO1 9SE	18/09/2020	£ 83,490	£ 100,229	No	Flat	455	£ 184	£ 220	Leasehold
27	18, Cocoa Suites, Navigation Road, York, York YO1 9AE	04/06/2021	£ 231,000	£ 253,504	No	Flat	463	£ 499	£ 548	Leasehold
28	Apartment 43, Bellerby Court, Palmer Lane, York, York YO1 7AF	20/12/2019	£ 179,550	£ 215,914	No	Flat	463	£ 388	£ 466	Leasehold
29	Apartment 25, Bellerby Court, Palmer Lane, York, York YO1 7AF	12/11/2019	£ 170,050	£ 202,478	No	Flat	463	£ 367	£ 437	Leasehold
30	Apartment 39, Bellerby Court, Palmer Lane, York, York YO1 7AF	23/07/2021	£ 165,000	£ 182,438	No	Flat	474	£ 348	£ 385	Leasehold
31	1, Strand House, Dixon Lane, York, York YO1 9QY	31/12/2019	£ 150,000	£ 180,379	No	Flat	474	£ 317	£ 381	Leasehold
32	1, Gibson House, Dixons Yard, York, York YO1 9SG	02/12/2021	£ 162,500	£ 175,857	No	Flat	484	£ 335	£ 363	Leasehold
33	42, Cocoa Suites, Navigation Road, York, York YO1 9AE	06/05/2021	£ 237,000	£ 260,229	No	Flat	484	£ 489	£ 537	Leasehold
34	9, Thistleton Court, Margaret Street, York, York YO10 4UE	31/01/2020	£ 143,000	£ 169,882	No	Flat	484	£ 295	£ 351	Leasehold
35	3, Peckitt Street, York, York YO1 9SF	19/02/2020	£ 830,000	£ 1,076,555	No	Flat	495	£ 1,676	£ 2,174	Freehold
36	7, Covent House, George Street, York, York YO1 9QE	05/12/2019	£ 120,000	£ 144,303	No	Flat	495	£ 242	£ 291	Leasehold
37	Apartment 9, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	506	£ 439	£ 479	Leasehold
38	23, Mayfair House, Piccadilly, York, York YO1 9QJ	09/11/2021	£ 180,000	£ 196,152	No	Flat	506	£ 356	£ 388	Leasehold
39	7, Escrick Mews, York, York YO10 4AW	09/10/2020	£ 140,000	£ 166,266	No	Flat	506	£ 277	£ 329	Leasehold
40	3, Hothams Court, York, York YO1 9PH	03/02/2020	£ 180,000	£ 214,012	No	Flat	506	£ 356	£ 423	Leasehold
41	Apartment 59, Bellerby Court, Palmer Lane, York, York YO1 7AF	06/01/2020	£ 170,050	£ 202,017	No	Flat	506	£ 336	£ 399	Leasehold
42	19b, Barbican Road, York, York YO10 5AA	31/10/2019	£ 168,000	£ 197,356	No	Flat	506	£ 332	£ 390	Leasehold
43	Apartment 93, Bellerby Court, Palmer Lane, York, York YO1 7AF	18/10/2019	£ 190,000	£ 223,200	No	Flat	506	£ 376	£ 441	Leasehold
44	Flat 3, Oxtoby Court, Fishergate, York, York YO10 4GA	25/01/2022	£ 200,000	£ 218,584	No	Flat	517	£ 387	£ 423	Leasehold
45	4, Dixons Yard, York, York YO1 9TJ	23/12/2019	£ 166,631	£ 200,378	No	Flat	517	£ 323	£ 388	Leasehold
46	Apartment 78, Bellerby Court, Palmer Lane, York, York YO1 7AF	02/02/2022	£ 230,000	£ 250,052	No	Flat	527	£ 436	£ 474	Leasehold
47	Apartment 2, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	527	£ 421	£ 459	Leasehold
48	33, Cocoa Suites, Navigation Road, York, York YO1 9AE	08/06/2021	£ 232,000	£ 254,601	No	Flat	527	£ 440	£ 483	Leasehold
49	9, Escrick Mews, York, York YO10 4AW	26/02/2021	£ 159,995	£ 195,481	No	Flat	527	£ 303	£ 371	Leasehold
50	8, Escrick Mews, York, York YO10 4AW	09/10/2020	£ 140,000	£ 166,266	No	Flat	527	£ 265	£ 315	Leasehold
51	Apartment 8, Bellerby Court, Palmer Lane, York, York YO1 7AF	09/06/2020	£ 210,900	£ 250,629	No	Flat	527	£ 400	£ 475	Leasehold
52	3, Trafalgar House, Piccadilly, York, York YO1 9QP	27/06/2022	£ 178,000	£ 182,596	No	Flat	538	£ 331	£ 339	Leasehold
53	Apartment 6, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	538	£ 413	£ 450	Leasehold
54	16, Barbican Court, Fawcett Street, York, York YO10 4AQ	25/10/2021	£ 188,000	£ 208,682	No	Flat	538	£ 349	£ 388	Leasehold
55	28, Fishergate, York, York YO10 4AB	06/12/2019	£ 150,000	£ 180,379	No	Flat	538	£ 279	£ 335	Leasehold
56	Apartment 35, Bellerby Court, Palmer Lane, York, York YO1 7AF	17/10/2019	£ 207,100	£ 243,288	No	Flat	538	£ 385	£ 452	Leasehold
57	26, Cocoa Suites, Navigation Road, York, York YO1 9AE	06/03/2020	£ 230,000	£ 272,053	No	Flat	549	£ 419	£ 496	Leasehold
58	57, Rowntree Wharf, York, York YO1 9XA	18/11/2019	£ 168,000	£ 200,038	No	Flat	549	£ 306	£ 364	Leasehold
59	1, Barbican Court, Fawcett Street, York, York YO10 4AQ	03/09/2021	£ 180,000	£ 203,117	No	Flat	560	£ 322	£ 363	Leasehold
60	29, Long Close Lane, York, York YO10 4UP	18/03/2022	£ 180,000	£ 198,431	No	Flat	570	£ 316	£ 348	Leasehold
61	5, Barbican Court, Fawcett Street, York, York YO10 4AQ	22/02/2022	£ 187,000	£ 203,303	No	Flat	581	£ 322	£ 350	Leasehold
62	13, Barbican Court, Fawcett Street, York, York YO10 4AQ	20/07/2021	£ 185,000	£ 204,552	No	Flat	581	£ 318	£ 352	Leasehold
63	2, Barbican Court, Fawcett Street, York, York YO10 4AQ	12/03/2021	£ 165,000	£ 185,860	No	Flat	581	£ 284	£ 320	Leasehold
64	Flat 4, Paragon House, Fawcett Street, York, York YO10 4BZ	21/08/2020	£ 181,000	£ 217,657	No	Flat	581	£ 311	£ 374	Leasehold
65	10, Long Close Lane, York, York YO10 4UP	07/07/2021	£ 145,000	£ 160,324	No	Flat	592	£ 245	£ 271	Leasehold
66	Apartment 7, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	603	£ 369	£ 402	Leasehold
67	Flat 7, Paragon House, Fawcett Street, York, York YO10 4BZ	15/10/2021	£ 195,000	£ 216,452	No	Flat	614	£ 318	£ 353	Leasehold
68	Apartment 88, Bellerby Court, Palmer Lane, York, York YO1 7AF	22/09/2021	£ 239,000	£ 269,695	No	Flat	614	£ 390	£ 440	Leasehold
69	62, Fishergate, York, York YO10 4AR	17/12/2019	£ 175,000	£ 210,442	No	Flat	614	£ 285	£ 343	Leasehold
70	Flat 1, 2, Walmgate, York, York YO1 9TJ	01/08/2022	£ 335,000	£ 338,735	No	Flat	635	£ 528	£ 533	Leasehold
71	29, Rosemary Court, York, York YO1 9UQ	16/12/2021	£ 200,000	£ 216,440	No	Flat	646	£ 310	£ 335	Leasehold
72	2, Trent House, Margaret Street, York, York YO10 4TH	14/10/2021	£ 165,000	£ 183,152	No	Flat	646	£ 255	£ 284	Leasehold
73	1, Mayfair House, Piccadilly, York, York YO1 9QJ	25/09/2020	£ 215,000	£ 258,106	No	Flat	657	£ 327	£ 393	Leasehold
74	24, Rowntree Wharf, York, York YO1 9XA	27/05/2022	£ 245,000	£ 259,841	No	Flat	667	£ 367	£ 389	Leasehold
75	8, St. Denys Court, St Denys Road, York, York YO1 9PU	24/09/2021	£ 200,000	£ 225,686	No	Flat	667	£ 300	£ 338	Leasehold
76	Flat 8, City House, Fawcett Street, York, York YO10 4BF	04/02/2020	£ 168,500	£ 200,339	No	Flat	673	£ 251	£ 298	Leasehold
77	29, Cocoa Suites, Navigation Road, York, York YO1 9AE	27/01/2022	£ 301,000	£ 328,968	No	Flat	678	£ 444	£ 485	Leasehold
78	Flat 1, Merchants Place, Merchant Gate, York, York YO1 9TU	20/07/2020	£ 280,000	£ 333,458	No	Flat	678	£ 413	£ 492	Leasehold
79	24, Mayfair House, Piccadilly, York, York YO1 9QJ	17/06/2021	£ 217,500	£ 238,689	No	Flat	689	£ 316	£ 346	Leasehold
80	7, St. Georges House, 23, Castlegate, York, York YO1 9RN	01/09/2021	£ 175,000	£ 197,475	No	Flat	700	£ 250	£ 282	Leasehold
81	18, Mayfair House, Piccadilly, York, York YO1 9QJ	30/10/2020	£ 217,500	£ 258,306	No	Flat	700	£ 311	£ 369	Leasehold
82	34, Cocoa Suites, Navigation Road, York, York YO1 9AE	19/06/2020	£ 282,000	£ 335,123	No	Flat	700	£ 403	£ 479	Leasehold
83	1, Dixons Yard, York, York YO1 9TJ	21/01/2022	£ 162,500	£ 177,599	No	Flat	710	£ 229	£ 250	Leasehold
84	46, Rowntree Wharf, York, York YO1 9XA	21/05/2021	£ 170,000	£ 186,662	No	Flat	710	£ 239	£ 263	Leasehold
85	10, Speculation Street, York, York YO1 9UF	22/09/2020	£ 150,000	£ 180,074	No	Flat	710	£ 211	£ 253	Leasehold
86	28, Trafalgar House, Piccadilly, York, York YO1 9QP	26/03/2021	£ 224,000	£ 252,320	No	Flat	721	£ 311	£ 350	Leasehold
87	Flat 9, Paragon House, Fawcett Street, York, York YO10 4BZ	31/10/2019	£ 235,000	£ 276,063	No	Flat	721	£ 326	£ 383	Leasehold
88	36, Cocoa Suites, Navigation Road, York, York YO1 9AE	26/04/2022	£ 330,000	£ 358,186	No	Flat	732	£ 451	£ 489	Leasehold
89	10, Shannon House, Margaret Street, York, York YO10 4UU	31/05/2022	£ 190,000	£ 201,510	No	Flat	743	£ 256	£ 271	Leasehold
90	89, Walmgate, York, York YO1 9UA	25/02/2022	£ 185,000	£ 201,128	No	Flat	743	£ 249	£ 271	Leasehold
91	16, Castlegate, York, York YO1 9RP	26/05/2021	£ 750,000	£ 867,552	No	Flat	743	£ 1,010	£ 1,168	Freehold
92	Flat 11, Merchants Place, Merchant Gate, York, York YO1 9TU	31/01/2020	£ 297,000	£ 352,832	No	Flat	743	£ 400	£ 475	Leasehold
93	1, Malt Shovel Court, York, York YO1 9TB	17/02/2021	£ 275,000	£ 315,868	No	Flat	753	£ 365	£ 419	Leasehold
94	Apartment 77, Bellerby Court, Palmer Lane, York, York YO1 7AF	14/01/2020	£ 316,883	£ 376,452	No	Flat	753	£ 421	£ 500	Leasehold
95	Apartment 4, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	764	£ 291	£ 317	Leasehold
96	149, Walmgate, York, York YO1 9UB	02/08/2021	£ 160,000	£ 179,301	No	Flat	764	£ 209	£ 235	Leasehold

97	Apartment 95, Bellerby Court, Palmer Lane, York, York YO1 7AF	12/03/2020	£ 330,000	£ 390,337	No	Flat	764	£ 432	£ 511	Leasehold
98	Apartment 5, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	775	£ 287	£ 312	Leasehold
99	Apartment 94, Bellerby Court, Palmer Lane, York, York YO1 7AF	23/12/2019	£ 362,500	£ 435,916	No	Flat	775	£ 468	£ 562	Leasehold
100	5, Ancroft Close, York, York YO1 9QF	01/04/2022	£ 180,000	£ 195,374	No	Flat	797	£ 226	£ 245	Leasehold
101	Apartment 30, Bellerby Court, Palmer Lane, York, York YO1 7AF	27/04/2020	£ 312,950	£ 373,140	No	Flat	807	£ 388	£ 462	Leasehold
102	Apartment 48, Bellerby Court, Palmer Lane, York, York YO1 7AF	24/02/2020	£ 308,000	£ 366,198	No	Flat	807	£ 382	£ 454	Leasehold
103	Apartment 24, Bellerby Court, Palmer Lane, York, York YO1 7AF	21/02/2020	£ 300,000	£ 356,686	No	Flat	807	£ 372	£ 442	Leasehold
104	Flat 4, 29, Walmgate, York, York YO1 9TX	31/01/2020	£ 172,000	£ 204,333	No	Flat	807	£ 213	£ 253	Leasehold
105	54, Navigation Road, York, York YO1 9UG	17/09/2020	£ 170,000	£ 204,084	No	Flat	829	£ 205	£ 246	Leasehold
106	6, Gloucester House, Castlegate, York, York YO1 9RN	07/08/2020	£ 320,000	£ 384,808	No	Flat	840	£ 381	£ 458	Leasehold
107	15, Festival Flats, York, York YO10 4AF	17/12/2019	£ 140,000	£ 168,354	No	Flat	861	£ 163	£ 196	Leasehold
108	6, Festival Flats, Paragon Street, York, York YO10 4AG	17/01/2022	£ 205,000	£ 224,048	No	Flat	872	£ 235	£ 257	Leasehold
109	5, John Walker House, Dixons Yard, York, York YO1 9SX	21/10/2019	£ 300,000	£ 352,421	No	Flat	883	£ 340	£ 399	Leasehold
110	20, Mayfair House, Piccadilly, York, York YO1 9QJ	28/01/2022	£ 290,000	£ 316,946	No	Flat	915	£ 317	£ 346	Leasehold
111	28, Rowntree Wharf, York, York YO1 9XA	23/06/2021	£ 204,000	£ 223,874	No	Flat	915	£ 223	£ 245	Leasehold
112	5, Piccadilly Lofts, Piccadilly, York, York YO1 9NX	19/04/2022	£ 540,000	£ 586,123	No	Flat	926	£ 583	£ 633	Leasehold
113	20, John Walker House, Dixons Yard, York, York YO1 9SX	02/06/2021	£ 290,000	£ 318,252	No	Flat	936	£ 310	£ 340	Leasehold
114	Apartment 3, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	969	£ 229	£ 250	Leasehold
115	65, Rowntree Wharf, York, York YO1 9XA	08/06/2021	£ 288,000	£ 316,057	No	Flat	1,055	£ 273	£ 300	Leasehold
116	Apartment 3, Bellerby Court, Palmer Lane, York, York YO1 7AF	01/12/2020	£ 330,000	£ 378,910	No	Flat	1,098	£ 301	£ 345	Leasehold
117	Apartment B, The Old Fire Station, Clifford Street, York, York YO1 9RD	02/11/2020	£ 575,000	£ 667,053	No	Flat	1,109	£ 519	£ 602	Leasehold
118	Apartment F, The Old Fire Station, Clifford Street, York, York YO1 9RD	30/10/2020	£ 525,000	£ 623,496	No	Flat	1,109	£ 474	£ 562	Leasehold
119	Apartment A, The Old Fire Station, Clifford Street, York, York YO1 9RD	10/09/2020	£ 820,000	£ 984,403	No	Flat	1,109	£ 740	£ 888	Leasehold
120	Apartment G, The Old Fire Station, Clifford Street, York, York YO1 9RD	05/11/2019	£ 1,250,000	£ 1,488,375	No	Flat	1,109	£ 1,127	£ 1,342	Leasehold
121	Apartment 8, 21, Clifford Street, York, York YO1 9RG	30/11/2021	£ 222,222	£ 242,162	No	Flat	1,141	£ 195	£ 212	Leasehold
122	Apartment 13, Bellerby Court, Palmer Lane, York, York YO1 7AF	29/06/2020	£ 420,000	£ 499,120	No	Flat	1,216	£ 345	£ 410	Leasehold
123	Apartment 10, Bellerby Court, Palmer Lane, York, York YO1 7AF	09/12/2019	£ 465,950	£ 560,317	No	Flat	1,216	£ 383	£ 461	Leasehold
124	Apartment 1, Bellerby Court, Palmer Lane, York, York YO1 7AF	18/10/2019	£ 425,000	£ 499,264	No	Flat	1,216	£ 349	£ 410	Leasehold
125	14, John Walker House, Dixons Yard, York, York YO1 9SX	22/09/2021	£ 525,000	£ 592,425	No	Flat	1,292	£ 406	£ 459	Leasehold
126	26, John Walker House, Dixons Yard, York, York YO1 9SX	07/12/2020	£ 530,000	£ 608,553	No	Flat	1,324	£ 400	£ 460	Leasehold
127	62, Rowntree Wharf, York, York YO1 9XA	12/11/2019	£ 370,000	£ 440,559	No	Flat	1,324	£ 279	£ 333	Leasehold
128	69, Rowntree Wharf, York, York YO1 9XA	25/01/2021	£ 372,500	£ 424,962	No	Flat	1,539	£ 242	£ 276	Leasehold
Total / Average		**128**	**£ 31,278,825**	**£ 35,989,697**			**83,223**	**£ 376**	**£ 432**	

House Price Indexation (HMLR HPI (York Dec 22 - Aug 22)

Dec-22	154.23
Aug-22	152.13
Change	1.36%

	Total	£psf	£psm
Average Sale Price	£ 35,989,697	£ 432	£ 4,655
Average Sale Price	£ 35,499,660	£ 427	£ 4,591

York Motor Sports Village YO32 9JS
Transactions within 0.5 miles (Flats only)
January 2019 - August 2022

Reference	Address	Date sold	Sold price	Estimated market value	New build?	Subcategory	Floor area ft²	Price per ft²	Market price per ft² (Dec 2022)	Tenure
1	89, Anthea Drive, York, York YO31 9DQ	19/08/2022	£ 320,000	£ 324,547	No	Semi_Detache	840	381	387	Freehold
2	45, Woodland Way, Huntington, York, York YO32 9NX	12/08/2022	£ 345,000	£ 349,902	No	Semi_Detache	1,216	284	288	Freehold
3	12, Eastway, Huntington, York, York YO31 9ES	05/08/2022	£ 278,450	£ 282,407	No	Semi_Detache	797	350	355	Freehold
4	8, Green Court, New Lane, Huntington, York, York YO32 9TB	05/08/2022	£ 175,000	£ 176,951	No	Flat	657	267	270	Leasehold
5	100, Highthorn Road, York, York YO31 9HB	03/08/2022	£ 330,050	£ 334,740	No	Semi_Detache	1,076	307	311	Freehold
6	9, Whitethorn Close, York, York YO31 9EZ	03/08/2022	£ 320,000	£ 324,547	No	Semi_Detache	883	363	368	Freehold
7	84, New Lane, Huntington, York, York YO32 9NH	25/07/2022	£ 335,000	£ 341,178	No	Detached	1,087	308	314	Freehold
8	26, Priory Wood Way, York, York YO31 9JG	30/06/2022	£ 295,000	£ 304,455	No	Semi_Detache	743	397	410	Freehold
9	80, Highthorn Road, York, York YO31 9HB	29/06/2022	£ 242,000	£ 249,756	No	Semi_Detache	743	326	336	Freehold
10	43, Woodland Way, Huntington, York, York YO32 9NX	29/06/2022	£ 300,000	£ 309,615	No	Semi_Detache	883	340	351	Freehold
11	3, Heather Close, Huntington, York, York YO32 9PB	29/06/2022	£ 250,000	£ 258,013	No	Semi_Detache	635	394	406	Freehold
12	9, Heathside, Huntington, York, York YO32 9AA	24/06/2022	£ 316,000	£ 326,095	No	Terraced	829	381	393	Freehold
13	16, Beech Glade, York, York YO31 9EP	16/06/2022	£ 248,250	£ 256,207	No	Semi_Detache	732	339	350	Freehold
14	32, Willow Glade, Huntington, York, York YO32 9NJ	16/05/2022	£ 290,000	£ 309,089	No	Detached	753	385	410	Freehold
15	103, Anthea Drive, York, York YO31 9DQ	09/05/2022	£ 285,000	£ 304,839	No	Terraced	700	407	436	Freehold
16	11, Whitethorn Close, York, York YO31 9EZ	04/05/2022	£ 220,000	£ 234,746	No	Semi_Detache	657	335	358	Freehold
17	64, Brockfield Park Drive, York, York YO31 9ER	03/05/2022	£ 272,000	£ 290,231	No	Semi_Detache	1,055	258	275	Freehold
18	12, Redthorn Drive, York, York YO31 9DW	31/03/2022	£ 280,000	£ 312,781	No	Semi_Detache	883	317	354	Freehold
19	First Floor Flat, 22, Saddlers Close, Huntington, York, York YO32 9LU	31/03/2022	£ 170,000	£ 187,407	No	Flat	624	272	300	Leasehold
20	20, Firwood Whin, York, York YO31 9JP	18/03/2022	£ 243,000	£ 271,449	No	Semi_Detache	570	426	476	Freehold
21	12, Skewsby Grove, York, York YO31 9DT	11/03/2022	£ 276,000	£ 308,013	No	Detached	721	383	427	Freehold
22	28, Saddlers Close, Huntington, York, York YO32 9LU	09/03/2022	£ 405,000	£ 451,976	No	Detached	1,044	388	433	Freehold
23	37, Saddlers Close, Huntington, York, York YO32 9LU	07/03/2022	£ 390,000	£ 435,236	No	Detached	1,109	352	393	Freehold
24	11, Briar Drive, York, York YO31 9DP	03/03/2022	£ 255,000	£ 284,854	No	Semi_Detache	603	423	473	Freehold
25	109, Anthea Drive, York, York YO31 9DQ	03/03/2022	£ 320,000	£ 359,420	No	Terraced	797	402	451	Freehold
26	13, Hawthorn Spinney, York, York YO31 9JQ	11/02/2022	£ 375,000	£ 414,980	No	Semi_Detache	1,528	245	272	Freehold
27	20, Kestrel Wood Way, York, York YO31 9EJ	24/01/2022	£ 238,000	£ 264,916	No	Semi_Detache	1,012	235	262	Freehold
28	222, New Lane, Huntington, York, York YO32 9LZ	20/01/2022	£ 235,000	£ 261,569	No	Detached	829	284	316	Freehold
29	1, Maythorn Road, York, York YO31 9DN	15/12/2021	£ 337,500	£ 373,290	No	Semi_Detache	1,141	296	327	Freehold
30	262, Malton Road, York, York YO32 9TE	10/12/2021	£ 640,000	£ 704,259	No	Detached	2,540	252	277	Freehold
31	16, Heathside, Huntington, York, York YO32 9ZD	03/12/2021	£ 410,000	£ 451,166	No	Detached	1,206	340	374	Freehold
32	8, Doriam Avenue, York, York YO31 9JF	30/11/2021	£ 240,000	£ 269,262	No	Semi_Detache	581	413	463	Freehold
33	24, Willow Glade, Huntington, York, York YO32 9NJ	26/11/2021	£ 275,000	£ 307,888	No	Detached	1,044	263	295	Freehold
34	32, Whitethorn Close, York, York YO31 9EY	05/11/2021	£ 207,500	£ 232,800	No	Semi_Detache	517	402	451	Freehold
35	12, Merlin Covert, York, York YO31 9JJ	01/11/2021	£ 250,000	£ 280,482	No	Semi_Detache	926	270	303	Freehold
36	108, Brockfield Park Drive, York, York YO31 9ER	22/10/2021	£ 300,000	£ 344,116	No	Terraced	861	348	400	Freehold
37	5, Maythorn Road, York, York YO31 9DN	20/10/2021	£ 240,000	£ 274,177	No	Semi_Detache	495	485	554	Freehold
38	28, Geldof Road, Huntington, York, York YO32 9JT	15/10/2021	£ 336,000	£ 383,923	No	Detached	1,173	286	327	Freehold
39	7, Doriam Drive, York, York YO31 9JE	30/09/2021	£ 390,000	£ 457,305	No	Terraced	1,453	268	315	Freehold
40	65, Heathside, Huntington, York, York YO32 9AA	30/09/2021	£ 285,000	£ 334,185	No	Terraced	829	344	403	Freehold
41	20, Maythorn Road, York, York YO31 9DL	30/09/2021	£ 220,000	£ 257,394	No	Semi_Detache	861	255	299	Freehold
42	16, Whitethorn Close, York, York YO31 9EY	30/09/2021	£ 295,000	£ 345,142	No	Semi_Detache	850	347	406	Freehold
43	8, Eastway, Huntington, York, York YO31 9ES	29/09/2021	£ 240,000	£ 283,560	No	Detached	732	328	387	Freehold
44	66, Highthorn Road, York, York YO31 9HB	29/09/2021	£ 250,000	£ 292,493	No	Semi_Detache	840	298	348	Freehold
45	5, Minster Avenue, York, York YO31 9DJ	24/09/2021	£ 240,000	£ 280,794	No	Semi_Detache	893	269	314	Freehold
46	47, Whenby Grove, York, York YO31 9DS	24/09/2021	£ 307,500	£ 359,767	No	Semi_Detache	926	332	389	Freehold
47	62, Whitethorn Close, York, York YO31 9EY	23/09/2021	£ 237,500	£ 277,869	No	Semi_Detache	807	294	344	Freehold
48	5, Beech Glade, York, York YO31 9EP	07/09/2021	£ 250,000	£ 292,493	No	Semi_Detache	667	375	438	Freehold
49	36, Lea Way, Huntington, York, York YO32 9PE	03/09/2021	£ 310,000	£ 362,692	No	Semi_Detache	1,281	242	283	Freehold
50	19, Forge Close, Huntington, York, York YO32 9LX	24/08/2021	£ 240,000	£ 280,324	No	Semi_Detache	646	372	434	Freehold
51	23, Hambleton Way, Huntington, York, York YO32 9PJ	23/08/2021	£ 330,000	£ 385,445	No	Semi_Detache	926	356	416	Freehold
52	10, Kendrew Close, Huntington, York, York YO32 9NL	17/08/2021	£ 251,000	£ 293,172	No	Semi_Detache	1,023	245	287	Freehold
53	4, Priory Wood Way, York, York YO31 9JG	13/08/2021	£ 245,000	£ 286,164	No	Semi_Detache	527	465	543	Freehold
54	32, Minster Avenue, York, York YO31 9DJ	09/08/2021	£ 206,000	£ 240,611	No	Semi_Detache	635	324	379	Freehold
55	98, New Lane, Huntington, York, York YO32 9NH	06/08/2021	£ 328,000	£ 387,352	No	Detached	936	350	414	Freehold
56	8, Heather Close, Huntington, York, York YO32 9PB	30/07/2021	£ 280,000	£ 326,000	No	Semi_Detache	915	306	356	Freehold
57	87, Highthorn Road, York, York YO31 9HA	26/07/2021	£ 258,000	£ 300,386	No	Semi_Detache	797	324	377	Freehold
58	24, Beech Glade, York, York YO31 9EP	16/07/2021	£ 210,000	£ 244,500	No	Semi_Detache	764	275	320	Freehold
59	3, Brecks Court, New Lane, Huntington, York, York YO32 9AH	30/06/2021	£ 440,000	£ 511,011	Yes	Semi_Detache	1,528	288	334	Freehold
60	78, Brockfield Park Drive, York, York YO31 9ER	29/06/2021	£ 297,000	£ 344,932	No	Semi_Detache	1,302	228	265	Freehold
61	75, Anthea Drive, York, York YO31 9DQ	28/06/2021	£ 350,000	£ 406,486	No	Semi_Detache	1,033	339	393	Freehold
62	24, Firwood Whin, York, York YO31 9JP	18/06/2021	£ 232,500	£ 270,023	No	Semi_Detache	689	338	392	Freehold
63	2, Eastway, Huntington, York, York YO31 9ES	18/06/2021	£ 335,000	£ 389,065	No	Semi_Detache	1,173	286	332	Freehold
64	27, Brockfield Park Drive, York, York YO31 9EF	17/06/2021	£ 250,000	£ 290,347	No	Semi_Detache	527	474	550	Freehold
65	10, Priory Wood Way, York, York YO31 9JG	11/06/2021	£ 195,000	£ 226,471	No	Semi_Detache	549	355	413	Freehold
66	12, Fox Covert, York, York YO31 9EN	08/06/2021	£ 240,000	£ 278,733	No	Semi_Detache	549	437	508	Freehold
67	268, New Lane, Huntington, York, York YO32 9LY	04/06/2021	£ 215,000	£ 249,698	No	Semi_Detache	732	294	341	Freehold
68	34, Woodland Way, Huntington, York, York YO32 9NY	04/06/2021	£ 322,000	£ 373,967	No	Semi_Detache	1,270	254	294	Freehold
69	57, Whenby Grove, York, York YO31 9DS	01/06/2021	£ 250,000	£ 290,347	No	Semi_Detache	829	302	350	Freehold
70	76, New Lane, Huntington, York, York YO32 9NN	24/05/2021	£ 400,000	£ 466,412	No	Semi_Detache	1,345	297	347	Freehold
71	2, Heather Close, Huntington, York, York YO32 9PB	19/05/2021	£ 338,000	£ 398,237	No	Detached	1,335	253	298	Freehold
72	8, Skewsby Grove, York, York YO31 9DT	30/04/2021	£ 309,000	£ 371,779	No	Detached	854	362	436	Freehold
73	5, Andrew Drive, Huntington, York, York YO32 9YF	30/04/2021	£ 355,000	£ 427,125	No	Detached	1,055	337	405	Freehold
74	118, Anthea Drive, York, York YO31 9DE	30/04/2021	£ 227,000	£ 267,755	No	Terraced	710	320	377	Freehold
75	23, Minster Avenue, York, York YO31 9DJ	30/04/2021	£ 273,000	£ 324,802	No	Semi_Detache	883	309	368	Freehold
76	144, New Lane, Huntington, York, York YO32 9NF	30/04/2021	£ 295,000	£ 350,977	No	Semi_Detache	1,119	264	314	Freehold
77	2, Brewery Cottages, New Lane, Huntington, York, York YO32 9NQ	27/04/2021	£ 362,000	£ 430,690	No	Semi_Detache	1,227	295	351	Freehold
78	60, Highthorn Road, York, York YO31 9HB	09/04/2021	£ 330,000	£ 392,618	No	Semi_Detache	1,195	276	329	Freehold
79	38, Heathside, Huntington, York, York YO32 9ZD	08/04/2021	£ 310,000	£ 368,823	No	Semi_Detache	958	324	385	Freehold
80	210, New Lane, Huntington, York, York YO32 9PS	26/03/2021	£ 261,000	£ 314,226	No	Semi_Detache	861	303	365	Freehold
81	12, Priory Wood Way, York, York YO31 9JG	19/03/2021	£ 199,000	£ 239,582	No	Semi_Detache	581	342	412	Freehold
82	7, Fox Covert, York, York YO31 9EN	16/03/2021	£ 250,000	£ 300,983	No	Semi_Detache	570	438	528	Freehold
83	30, Heathside, Huntington, York, York YO32 9ZD	12/03/2021	£ 290,000	£ 346,305	No	Terraced	958	303	361	Freehold
84	31, Geldof Road, Huntington, York, York YO32 9JT	12/03/2021	£ 263,000	£ 320,865	No	Detached	926	284	347	Freehold
85	21, Minster Avenue, York, York YO31 9DJ	11/03/2021	£ 247,000	£ 294,956	No	Terraced	968	255	305	Freehold
86	29, New Lane, Huntington, York, York YO32 9NW	09/03/2021	£ 450,000	£ 549,008	No	Detached	1,206	373	455	Freehold
87	121, Highthorn Road, York, York YO31 9HA	04/03/2021	£ 242,000	£ 291,351	No	Semi_Detache	775	312	376	Freehold
88	6, Brecks Court, New Lane, Huntington, York, York YO32 9AH	26/02/2021	£ 315,000	£ 384,865	Yes	Terraced	1,109	284	347	Freehold
89	60, Woodland Way, Huntington, York, York YO32 9NY	26/02/2021	£ 225,000	£ 277,020	No	Semi_Detache	646	348	429	Freehold
90	First Floor Flat, 4, Saddlers Close, Huntington, York, York YO32 9LU	26/02/2021	£ 165,000	£ 189,521	No	Flat	646	255	293	Leasehold
91	7, Brecks Court, New Lane, Huntington, York, York YO32 9AH	24/02/2021	£ 334,000	£ 408,079	Yes	Terraced	1,109	301	368	Freehold
92	35, Doriam Drive, York, York YO31 9JE	24/02/2021	£ 190,000	£ 233,928	No	Semi_Detache	635	299	368	Freehold
93	22, Minster Avenue, York, York YO31 9DJ	11/02/2021	£ 239,000	£ 294,257	No	Semi_Detache	689	347	427	Freehold
94	31, Heathside, Huntington, York, York YO32 9AA	04/02/2021	£ 260,000	£ 320,112	No	Semi_Detache	829	314	386	Freehold
95	23, Fox Covert, York, York YO31 9EN	29/01/2021	£ 306,000	£ 374,998	No	Semi_Detache	786	389	477	Freehold
96	4, Brecks Court, New Lane, Huntington, York, York YO32 9AH	29/01/2021	£ 450,000	£ 551,468	Yes	Semi_Detache	1,528	294	361	Freehold
97	1, Saddlers Close, Huntington, York, York YO32 9LU	29/01/2021	£ 310,000	£ 384,199	No	Detached	958	324	401	Freehold
98	102, New Lane, Huntington, York, York YO32 9NH	29/01/2021	£ 360,000	£ 446,167	No	Detached	1,152	313	387	Freehold
99	116, Anthea Drive, York, York YO31 9DE	21/01/2021	£ 247,500	£ 303,307	No	Semi_Detache	710	348	427	Freehold
100	28, Minster Avenue, York, York YO31 9DJ	11/01/2021	£ 280,000	£ 343,136	No	Semi_Detache	1,044	268	329	Freehold
101	5, Brecks Court, New Lane, Huntington, York, York YO32 9AH	21/12/2020	£ 330,000	£ 404,160	Yes	Terraced	1,109	298	365	Freehold

102	24, Geldof Road, Huntington, York, York YO32 9JT	21/12/2020	£ 260,000	£ 324,394	No	Detached	926	281	350	Freehold
103	90, Brockfield Park Drive, York, York YO31 9ER	15/12/2020	£ 240,000	£ 296,180	No	Semi_Detache	926	259	320	Freehold
104	12, Beech Glade, York, York YO31 9EP	11/12/2020	£ 249,000	£ 307,287	No	Semi_Detache	570	436	539	Freehold
105	3, Saddlers Close, Huntington, York, York YO32 9LU	11/12/2020	£ 235,000	£ 290,010	No	Semi_Detache	657	358	442	Freehold
106	1, Brecks Court, New Lane, Huntington, York, York YO32 9AH	17/11/2020	£ 570,000	£ 719,500	Yes	Detached	1,776	321	405	Freehold
107	94, Brockfield Park Drive, York, York YO31 9ER	30/10/2020	£ 363,000	£ 463,093	No	Semi_Detache	1,432	254	323	Freehold
108	6, Fern Close, Huntington, York, York YO32 9PA	30/10/2020	£ 220,000	£ 280,663	No	Semi_Detache	635	346	442	Freehold
109	37, Woodland Way, Huntington, York, York YO32 9NX	28/10/2020	£ 178,000	£ 227,082	No	Semi_Detache	624	285	364	Freehold
110	27, Priory Wood Way, York, York YO31 9JH	26/10/2020	£ 4,104	£ 5,179	No	Other	947	4	5	Freehold
111	41, Whenby Grove, York, York YO31 9DS	26/10/2020	£ 240,000	£ 306,177	No	Semi_Detache	893	269	343	Freehold
112	62, Heathside, Huntington, York, York YO32 9ZD	23/10/2020	£ 395,000	£ 511,501	No	Detached	1,216	325	421	Freehold
113	10, Elm Grove, York, York YO31 9HD	23/10/2020	£ 270,000	£ 344,450	No	Semi_Detache	689	392	500	Freehold
114	26, Firwood Whin, York, York YO31 9JP	22/10/2020	£ 197,000	£ 251,321	No	Semi_Detache	549	359	458	Freehold
115	66, Whitestone Drive, York, York YO31 9HZ	08/10/2020	£ 500,000	£ 647,469	No	Detached	1,604	312	404	Freehold
116	44, Willow Glade, Huntington, York, York YO32 9NJ	29/09/2020	£ 280,000	£ 363,233	No	Semi_Detache	764	366	475	Freehold
117	41, Woodland Way, Huntington, York, York YO32 9NX	28/09/2020	£ 295,000	£ 389,929	No	Detached	1,044	283	373	Freehold
118	72, Brockfield Park Drive, York, York YO31 9ER	22/09/2020	£ 210,000	£ 272,425	No	Semi_Detache	915	230	298	Freehold
119	15, Redthorn Drive, York, York YO31 9DW	21/09/2020	£ 266,000	£ 345,071	No	Semi_Detache	829	321	416	Freehold
120	21, Kestrel Wood Way, York, York YO31 9EQ	11/09/2020	£ 230,000	£ 298,370	No	Semi_Detache	958	240	311	Freehold
121	34, Minster Avenue, York, York YO31 9DJ	11/09/2020	£ 225,000	£ 291,883	No	Semi_Detache	646	348	452	Freehold
122	7, Kendrew Close, Huntington, York, York YO32 9NL	04/09/2020	£ 230,000	£ 298,370	No	Semi_Detache	797	289	375	Freehold
123	19, Willow Glade, Huntington, York, York YO32 9NJ	28/08/2020	£ 210,010	£ 273,295	No	Semi_Detache	775	271	353	Freehold
124	124, Anthea Drive, York, York YO31 9DE	14/08/2020	£ 220,000	£ 286,295	No	Semi_Detache	786	280	364	Freehold
125	4, Beech Glade, York, York YO31 9EP	27/07/2020	£ 279,000	£ 361,289	No	Semi_Detache	678	411	533	Freehold
126	37, Whitestone Drive, York, York YO31 9HY	17/07/2020	£ 265,000	£ 343,160	No	Semi_Detache	1,033	256	332	Freehold
127	24, Heathside, Huntington, York, York YO32 9ZD	10/07/2020	£ 375,000	£ 496,511	No	Detached	1,206	311	412	Freehold
128	21, Beech Glade, York, York YO31 9EP	03/07/2020	£ 230,000	£ 297,837	No	Semi_Detache	689	334	432	Freehold
129	142, Anthea Drive, York, York YO31 9DE	26/06/2020	£ 250,000	£ 320,979	No	Semi_Detache	990	252	324	Freehold
130	44, Brockfield Park Drive, York, York YO31 9ER	12/06/2020	£ 240,000	£ 308,139	No	Semi_Detache	915	262	337	Freehold
131	17, Firwood Whin, York, York YO31 9JP	12/06/2020	£ 230,000	£ 295,300	No	Semi_Detache	700	329	422	Freehold
132	15, Firwood Whin, York, York YO31 9JP	29/05/2020	£ 270,000	£ 345,937	No	Semi_Detache	700	386	494	Freehold
133	56, Woodland Way, Huntington, York, York YO32 9NY	24/04/2020	£ 232,000	£ 300,284	No	Semi_Detache	1,066	218	282	Freehold
134	11, Eastway, Huntington, York, York YO31 9ET	20/03/2020	£ 223,000	£ 293,900	No	Detached	840	266	350	Freehold
135	7, Green Court, New Lane, Huntington, York, York YO32 9TB	20/03/2020	£ 158,000	£ 186,889	No	Flat	635	249	294	Leasehold
136	First Floor Flat, 11, Saddlers Close, Huntington, York, York YO32 9LU	12/03/2020	£ 155,000	£ 183,340	No	Flat	592	262	310	Leasehold
137	8, Beech Glade, York, York YO31 9EP	12/03/2020	£ 205,000	£ 265,387	No	Semi_Detache	775	265	342	Freehold
139	20, Heathside, Huntington, York, York YO32 9ZD	27/02/2020	£ 380,000	£ 503,094	No	Detached	1,216	312	414	Freehold
140	51, Brockfield Park Drive, York, York YO31 9EL	21/02/2020	£ 195,000	£ 253,646	No	Semi_Detache	732	266	347	Freehold
141	79, Anthea Drive, York, York YO31 9DQ	17/02/2020	£ 250,000	£ 330,983	No	Detached	721	347	459	Freehold
142	20, Whitethorn Close, York, York YO31 9EY	17/02/2020	£ 220,000	£ 286,164	No	Semi_Detache	753	292	380	Freehold
144	38, Woodland Way, Huntington, York, York YO32 9NY	10/01/2020	£ 230,000	£ 299,412	No	Semi_Detache	743	310	403	Freehold
145	140, New Lane, Huntington, York, York YO32 9NF	18/12/2019	£ 227,000	£ 305,178	No	Detached	624	364	489	Freehold
146	52, Woodland Way, Huntington, York, York YO32 9NY	21/11/2019	£ 195,000	£ 256,574	No	Semi_Detache	1,044	187	246	Freehold
147	8, Minster Avenue, York, York YO31 9DJ	18/11/2019	£ 250,000	£ 328,940	No	Semi_Detache	893	280	368	Freehold
148	43, Doriam Drive, York, York YO31 9JE	15/11/2019	£ 368,000	£ 484,200	No	Semi_Detache	1,464	251	331	Freehold
149	16, Kestrel Wood Way, York, York YO31 9EJ	08/11/2019	£ 257,500	£ 345,131	No	Detached	710	362	486	Freehold
150	60, New Lane, Huntington, York, York YO32 9NN	31/10/2019	£ 200,000	£ 265,416	No	Detached	689	290	385	Freehold
151	8, Kendrew Close, Huntington, York, York YO32 9NL	11/10/2019	£ 315,000	£ 418,030	No	Detached	1,604	196	261	Freehold
152	62, Brockfield Park Drive, York, York YO31 9ER	02/10/2019	£ 16,500	£ 21,145	No	Other	570	29	37	Leasehold
153	59, Lea Way, Huntington, York, York YO32 9PE	27/09/2019	£ 228,000	£ 295,299	No	Semi_Detache	797	286	371	Freehold
154	26, Heathside, Huntington, York, York YO32 9ZD	06/09/2019	£ 340,000	£ 447,872	No	Detached	1,206	282	372	Freehold
155	9, Brewery Cottages, New Lane, Huntington, York, York YO32 9NQ	30/08/2019	£ 232,000	£ 302,239	No	Semi_Detache	915	254	330	Freehold
156	44, Heathside, Huntington, York, York YO32 9ZD	30/08/2019	£ 390,000	£ 517,522	No	Detached	1,216	321	425	Freehold
157	10, Minster Avenue, York, York YO31 9DJ	14/08/2019	£ 174,000	£ 226,679	No	Semi_Detache	491	355	462	Freehold
158	15, Saddlers Close, Huntington, York, York YO32 9LU	13/08/2019	£ 158,000	£ 185,004	No	Flat	829	191	223	Leasehold
159	82, Highthorn Road, York, York YO31 9HB	12/08/2019	£ 220,250	£ 286,932	No	Semi_Detache	721	305	398	Freehold
160	25, Brockfield Park Drive, York, York YO31 9EF	08/08/2019	£ 177,000	£ 230,588	No	Semi_Detache	581	305	397	Freehold
161	14, Beech Glade, York, North Yorkshire YO31 9EP	02/08/2019	£ 205,000	£ 267,065	No	Semi_Detache	570	359	468	Freehold
162	3, Gorse Paddock, York, York YO31 9EW	01/08/2019	£ 224,000	£ 291,817	No	Semi_Detache	646	347	452	Freehold
163	190, New Lane, Huntington, York, York YO32 9PS	31/07/2019	£ 256,000	£ 344,728	No	Detached	926	277	372	Freehold
164	16, Ferguson Way, Huntington, York, York YO32 9YG	26/07/2019	£ 312,000	£ 420,137	No	Detached	1,313	238	320	Freehold
165	19, Doriam Drive, York, York YO31 9JE	26/07/2019	£ 336,000	£ 443,492	No	Semi_Detache	1,356	248	327	Freehold
166	21, Heathside, Huntington, York, York YO32 9AA	24/07/2019	£ 225,000	£ 295,587	No	Terraced	732	307	404	Freehold
167	19, Kestrel Wood Way, York, York YO31 9EQ	22/07/2019	£ 212,000	£ 279,822	No	Semi_Detache	592	358	473	Freehold
168	12, Sherwood Grove, Huntington, York, York YO31 9DH	19/07/2019	£ 195,000	£ 257,384	No	Semi_Detache	657	297	392	Freehold
169	12, Minster Avenue, York, York YO31 9DJ	04/07/2019	£ 165,000	£ 217,786	No	Semi_Detache	495	333	440	Freehold
170	85, Highthorn Road, York, York YO31 9HA	25/06/2019	£ 232,000	£ 306,252	No	Semi_Detache	786	295	390	Freehold
171	108, Anthea Drive, York, York YO31 9DE	21/06/2019	£ 210,000	£ 277,211	No	Semi_Detache	764	275	363	Freehold
172	49, Heathside, Huntington, York, York YO32 9AA	14/06/2019	£ 375,000	£ 505,188	No	Detached	1,206	311	419	Freehold
173	37, Whitethorn Close, York, York YO31 9EZ	03/06/2019	£ 220,000	£ 289,464	No	Terraced	915	240	316	Freehold
174	32, Woodland Way, Huntington, York, York YO32 9NY	23/05/2019	£ 220,000	£ 290,645	No	Semi_Detache	753	292	386	Freehold
175	2, Green Court, New Lane, Huntington, York, York YO32 9TB	22/05/2019	£ 160,000	£ 190,332	No	Flat	657	244	290	Leasehold
176	4, Gorse Paddock, York, York YO31 9EW	17/05/2019	£ 262,000	£ 346,132	No	Semi_Detache	635	413	545	Freehold
177	30, Priory Wood Way, York, York YO31 9JG	29/04/2019	£ 240,000	£ 314,945	No	Semi_Detache	926	259	340	Freehold
178	22, Heathside, Huntington, York, York YO32 9ZD	26/04/2019	£ 388,000	£ 517,370	No	Detached	1,216	319	425	Freehold
179	64, New Lane, Huntington, York, York YO32 9NN	23/04/2019	£ 290,000	£ 379,799	No	Terraced	1,227	236	310	Freehold
180	24, Oak Glade, York, York YO31 9JW	15/04/2019	£ 200,000	£ 262,454	No	Semi_Detache	635	315	413	Freehold
181	4, Skewsby Grove, York, York YO31 9DT	09/04/2019	£ 318,000	£ 424,030	No	Detached	1,163	274	365	Freehold
182	16, Green Court, New Lane, Huntington, York, York YO32 9TB	29/03/2019	£ 157,000	£ 184,474	No	Flat	614	256	301	Leasehold
183	5, Kestrel Wood Way, York, York YO31 9EQ	25/03/2019	£ 191,000	£ 250,998	No	Semi_Detache	667	286	376	Freehold
184	48, Whitethorn Close, York, York YO31 9EY	05/03/2019	£ 147,500	£ 193,834	No	Semi_Detache	527	280	368	Freehold
185	29, Minster Avenue, York, York YO31 9DJ	04/03/2019	£ 245,000	£ 321,961	No	Semi_Detache	743	330	434	Freehold
186	164, New Lane, Huntington, York, York YO32 9ND	22/02/2019	£ 295,000	£ 393,886	No	Detached	743	397	530	Freehold
187	17, Hambleton Way, Huntington, York, York YO32 9PJ	08/02/2019	£ 184,000	£ 242,870	No	Semi_Detache	646	285	376	Freehold
188	4, Sherwood Grove, Huntington, York, York YO31 9DH	01/02/2019	£ 226,000	£ 298,308	No	Semi_Detache	797	284	375	Freehold
191	51, Willow Glade, Huntington, York, York YO32 9NJ	04/01/2019	£ 205,000	£ 271,696	No	Semi_Detache	635	323	428	Freehold
Total / Average		**187**	**£ 50,274,614**	**£ 60,903,565**			**166,290**	**302**	**366**	

House Price Indexation (HMLR HPI (York Dec 22 - Aug 22)

Dec-22	154.23
Aug-22	152.13
Change	1.36%

	Total	£psf	£psm
Average Sale Price	£ 60,903,565	£ 366	£ 3,942
Average Sale Price	£ 60,074,300	£ 361	£ 3,889

York Motor Sports Village YO32 9JS
Transactions within 0.5 miles (Flats only)
January 2019 - August 2022

Reference	Address	Date sold	Sold price	Estimated market value	New build?	Subcategory	Floor area ft²	Price per ft²	Market price per ft² (Dec 2022)	Tenure
1	8, Green Court, New Lane, Huntington, York, York YO32 9TB	05/08/2022	£ 175,000	£ 176,951	No	Flat	657	£ 267	£ 270	Leasehold
2	First Floor Flat, 22, Saddlers Close, Huntington, York, York YO32 9LU	31/03/2022	£ 170,000	£ 187,407	No	Flat	624	£ 272	£ 300	Leasehold
3	First Floor Flat, 4, Saddlers Close, Huntington, York, York YO32 9LU	26/02/2021	£ 165,000	£ 189,521	No	Flat	646	£ 255	£ 293	Leasehold
4	7, Green Court, New Lane, Huntington, York, York YO32 9TB	20/03/2020	£ 158,000	£ 186,889	No	Flat	635	£ 249	£ 294	Leasehold
5	First Floor Flat, 11, Saddlers Close, Huntington, York, York YO32 9LU	12/03/2020	£ 155,000	£ 183,340	No	Flat	592	£ 262	£ 310	Leasehold
6	15, Saddlers Close, Huntington, York, York YO32 9LU	13/08/2019	£ 158,000	£ 185,004	No	Flat	829	£ 191	£ 223	Leasehold
7	2, Green Court, New Lane, Huntington, York, York YO32 9TB	22/05/2019	£ 160,000	£ 190,332	No	Flat	657	£ 244	£ 290	Leasehold
8	16, Green Court, New Lane, Huntington, York, York YO32 9TB	29/03/2019	£ 157,000	£ 184,474	No	Flat	614	£ 256	£ 301	Leasehold
Total / Average		**8**	**£ 1,298,000**	**£ 1,483,918**			**5,253**	**£ 247**	**£ 283**	

House Price Indexation (HMLR HPI (York Dec 22 - Aug 22)

Dec-22	154.23
Aug-22	152.13
Change	**1.36%**

	Total	£psf	£psm
Average Sale Price	£ 1,483,918	£ 283	£ 3,041
Average Sale Price	£ 1,463,713	£ 279	£ 2,999

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #50 –

COMPLETE

Started:	Monday, March 27, 2023 3:05:32 PM
Last Modified:	Monday, March 27, 2023 3:20:12 PM
Time Spent:	00:14:39
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Tim Waring

[redacted]

Contact details:

Organisation (optional)	Quod Ltd
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Yes; please refer to attached correspondence (Quod) and report (Bidwells).

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

No; please refer to attached correspondence (Quod) and report (Bidwells).

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

No; please refer to attached correspondence (Quod) and report (Bidwells).

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Yes; please refer to attached correspondence (Quod) and report (Bidwells).

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Yes; please refer to attached correspondence (Quod) and report (Bidwells).

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

No; please refer to attached correspondence (Quod) and report (Bidwells).

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

No; please refer to attached correspondence (Quod) and report (Bidwells).

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Yes; please refer to attached correspondence (Quod) and report (Bidwells).

Q22

9a. Do you have any other comments on the CIL evidence base?

Yes; please refer to attached correspondence (Quod) and report (Bidwells).

Our ref: Q70385/tw/gl
Your ref:
Email: [redacted]
Date: 27 March 2023

CIL Consultation
City of York Council
West Offices
Station Rise
York
YO1 6GA

For the attention of Strategic Planning Policy Team

By Email

Dear Strategic Planning Policy Team

Draft Community Infrastructure Levy – City of York Council (February 2023) Representations on behalf of Langwith Development Partnership Ltd ("LDP")

I write on behalf of Langwith Development Partnership Ltd ("LDP") in response to City of York Council's ("CYC") Community Infrastructure Levy ("CIL") Draft Charging Schedule ("DCS").

Government guidance clearly states that CIL rates require, amongst other matters, for charging authorities to consider the impacts of proposed rates on delivering the types of sites and uses set out in their Local Plan. Presently, CYC do not have an adopted Local Plan, but their current emerging Local Plan is close to adoption[1]. The CIL is intended to be applied post adoption of the Local Plan.

LDP is promoting one of the largest strategic sites within York (Land to the West of Elvington Lane - site ST15, covered by Policy SS13) ("ST15") of the draft Local Plan which will deliver a significant scale of housing, meeting a large proportion of the City's housing needs. It is, therefore, essential to the delivery of the Local Plan's strategy that the development of ST15 is not undermined on viability grounds.

These representations are concerned with a discreet matter, notably, the proposals to zero rate the residential development on this strategic site, and not to apply same to other land uses[2].

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[1] The Proposed Modifications, following the Examination of the Local Plan by the Inspectors appointed by the Secretary of State were published alongside the DCS and it is anticipated that the Local Plan will be adopted this year.

[2] It is proposed to charge CIL rates on sheltered/retirement accommodation (£100) PBSA (without an affordable housing contribution) (£150), PBSA (with 100 or fewer student bedrooms and an affordable housing contribution) (£50), convenience retail (up to 450 sqm GIA) (£100), comparison retail (outside the City Centre boundary) (£100).

It is LDP's case that the application of a CIL charge to other land uses that may come forward in the development of the new settlement at ST15 have not been proven to be viable. In fact, the attached report (by Bidwells) demonstrates it not to be viable to charge CIL on any land use at ST15 (see below for a summary of reasons).

It is, therefore, not appropriate to charge any CIL rate on any land use within ST15, and that all land uses developed at ST15 in the future should be zero rated.

Guidance on Setting CIL Rates

Government guidance on viability is contained in the National Planning Guidance, and notably states that:

- *Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan*[3]*.*
- *In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies*[4]*.*
- *It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan*[5]*.*
- *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.*
- *This balance is at the centre of the charge-setting process. In meeting the regulatory requirements, charging authorities should be able to show and explain how their proposed levy rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area (see regulation 14(1), as amended by the 2014 Regulations)*[6]*.*

The Government's guidance on setting CIL rates is contained in the Community Infrastructure Levy Guidance (last updated January 2023). This sets out the following, relevant to these representations:

[3] Paragraph 002 Reference ID: 10-002-20190509.
[4] Paragraph 003 Reference ID: 10-003-20180724.
[5] Paragraph 005 Reference ID: 10-005-20180724.
[6] Paragraph 010 Reference ID: 25-010-20190901.

1 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[7], and they should show how "*their proposed levy rate (or rates) will contribute towards the implementation of their relevant Plan and supporting development across their area*".

In this case, the relevant Local Plan will be the York Local Plan, currently in draft.

2 The Regulations note that charging Authorities can apply differential rates in a flexible way, to help ensure the viability of development is not put at risk[8].

3 If the evidence shows that an area includes a zone, such as a strategic site which has low, very low or zero viability, the charging authority should consider setting a low or zero levy rate in that area[9].

In summary, both sets of guidance, and the Regulations, recognise that differential rates should be applied and zero rating, notably, where the viability of development or strategic priorities of a Local Plan are put in jeopardy. This letter goes on to demonstrates that charging any CIL on any land use at ST15 will put the delivery of that strategic project at risk, which would serve to wholesale undermine the Local Plan vision.

The City of York Local Plan and the Importance of ST15 to its Vision

The Vision of the emerging Local Plan is set out in Section 2 of the draft Local Plan, and of note is its objective of delivering "…*sustainable patterns and forms of development to support the ambition and the delivery of the City's economic, environmental and social objectives…*".

The key development principles of the Local Plan are set out in Policy DP1: York Sub Area, and notably, the approach taken in the Local Plan is to ensure that:

"*The housing needs of City of York's current and future population including that arising from economic and institutional growth is met within the York Local Authority area"*.

ST15, amongst a number of other Strategic Sites as well as lessor scale sites, has been allocated to meet the City's housing needs in part during the Plan period[10].

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[7] Paragraph: 010 reference ID: 25-010-2019-09-01.
[8] Paragraph: 022 reference ID: 25-022-2019-09-01.
[9] Paragraph: 022 reference ID: 25-022-2019-09-01.
[10] The garden village promoted under allocation ST15 is intended to bridge the Plan period of the draft Local Plan, and its next review.

Delivering a sustainable community of scale is key to satisfying the objectives of the vision of the Local Plan. It is important that its delivery is, therefore, not compromised with unnecessary burdens, and this is especially important in relation to the viability of delivery, given the significant costs of infrastructure required to deliver a project of this scale.

It is recognised in the allocation of the new garden village such as that at ST15 that in order to establish a new sustainable community, a range of land uses are required beyond residential. These are specifically mentioned in Criterion (ix) of Policy SS13. This is also recognised in national planning policy where it is noted that to "*…support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment)*[11]*.*

The provision of a range of land uses, including those subject to proposed CIL charges in the draft CIL charging schedule outlined beforehand, are integral to creating a sustainable community and are similarly integral to the overall viability of the site.

SS13 recognises that in order to deliver a sustainable community, there are requirements for a broad range of infrastructure which will be secured through planning conditions and obligations, and which will impact the development values, by imposing significant costs. Consequently, CIL rates should be set by reference to these policy objectives and should not be at a level that would put at risk the delivery of a sustainable new community.

Viability Evidence of CYC

CYC commissioned Porter Planning Economics Ltd ("PPE") to undertake an economic viability assessment to identify the potential available headroom for introducing CIL[12]. The purpose of the viability work is to provide a sound basis for judging the impact of CIL (as well as other obligations) on development and ensuring the right "balance" is struck, ensuring that the delivery of sites allocated for development are not put at risk.

PPE's Viability Study follows a relatively conventional approach, involving a series of development appraisals of scheme typologies along with separate analysis of the major strategic sites proposed in the emerging York Local Plan.

It is notable, as picked up by Bidwells, that the analysis of ST15 only addresses the residential element of the scheme, and does not consider the commercial elements of the scheme which are integral to creating a sustainable garden village.

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[11] Paragraph 73, bullet point (b) of the NPPF.
[12] The City of York CIL Viability Study (published December 2022) was an update of previous studies carried out by Peter Brett Associates (PBA) and PPE as part of the Local Plan viability testing.

Bidwells demonstrate that the outputs from the Viability Study in relation to ST15 show there is a headroom financial deficit from the residential component of the development, that means that the required land value for the non-residential development is beyond the total serviced land value that could be achieved from the non-residential uses on ST15.

City of York CIL DCS

The DCS recognises the viability constraints on the delivery of strategy sites, including ST15 and, as such proposes to zero rate the charge for residential on such sites, whereas elsewhere in the City, residential will attract a charge. LDP support this zero rating for the strategic site ST15, and concur with CYC that it is not viable to charge CIL on such land uses.

The draft CIL charging schedule proposes the following rates for land uses that will be provided in ST15, and which are likely to be required in order to deliver a sustainable community.

Table 1: Land Uses Proposed to be Subject to CIL at ST15

Development Type	CIL Rate (per sqm)
Sheltered/retirement accommodation	£100
Extra care accommodation on brownfield sites	£100
Purpose built student housing (without an affordable housing contribution)	£150
Purpose built student housing with 100 or less student bedrooms (with an affordable housing contribution)	£50
Convenience retail with up to 450 sqm gross internal area	£100
Comparison retail built outside the City Centre boundary	£100

Bidwells demonstrates, in the attached report that none of the uses outlined in Table 1 above would be capable of generating a land value sufficient to address the headroom deficit that arises from the residential element of ST15. This appears to be acknowledged by PPE, who recognise that the delivery of ST15 has a significant cost burden given the substantial infrastructure required to open up the site.

It is demonstrated in the attached report that these significant infrastructure costs need to be managed on an "*all uses*" and "*whole site*". It is now a well-established principle of viability assessments (for planning purposes) that the entirety of the red line of the planning application should be considered; it is, therefore, the case that the viability of strategic developments in local plan making should also adopt the same *"all use/whole site"* principle.

Summary and Conclusions

LDP is a key landowner and promoter of development within the City of York and, most notably, the promoter of the largest allocation for a sustainable residential lead community (site ST15). Development of ST15 is central in the delivery of the Local Plan's vision and objectives. LDP wish to work positively with CYC to ensure that the policy requirements, as well as CIL, are appropriate, viable and will incentivise and accelerate development of much needed housing in the City.

It is demonstrated in these representations that:

- Residential development on ST15 should be zero rated, as there is insufficient headroom for a CIL charge.
- The draft CIL charging schedule proposes to apply a levy on other land uses in ST15, which are integral to the development of a sustainable community.
- There is a headroom viability deficit for the residential element of ST15, which is beyond the land value that could be achieved for the non-residential uses.
- It is appropriate to consider viability of ST15 on an "*all uses*" and "*whole site*" basis.
- There is insufficient viability headroom within ST15 when it is considered as a whole, for any land use to be charged CIL.
- In light of the above, ST15 should be zero rated for all CIL purposes, in its entirety, regardless of the land uses that come forward and will make up this sustainable community.

LDP is keen to work with OPDC to address these issues before the DCS is submitted for Examination. LDP reserve the right to be represented at any Examination Hearing, and in the meantime, we look forward to working with you and PPE on the above matters.

If you have any questions at this stage, please let me know.

Yours faithfully

[redacted]

Encs

Langwith Development Partnership
March 2023

BIDWELLS

CITY OF YORK CONSULTATION
COMMUNITY INFRASTRUCTURE LEVY

Table of Contents

1.0 Introduction

1.1 Bidwells is instructed by Langwith Development Partnership ("LDP") to review the viability evidence base that has recently been published by City of York Council ("CYC" or "the Council") to support the current consultation that is being carried out regarding the potential implementation of a Community Infrastructure Levy ("CIL").

1.2 Bidwells has advised LDP over a number of years regarding the viability of site ST15 Land West of Elvington Lane ("ST15") which is being promoted by LDP. Bidwells has specifically advised on viability and in 2022 engaged fully in the Examination in Public of the new York Local Plan, including extensive collaborative work with the Council's consultant Porter Planning Economics ("PPE"). It is noted that PPE has also produced the viability evidence base in support of the current CIL consultation.

1.3 Bidwells is therefore well able to comment on the evidence base prepared for the CIL consultation and particularly its relevance to site ST15.

1.4 These representations comment on the general approach to viability testing taken by PPE, the analysis of the ability of residential development on ST15 to sustain a CIL charge, the analysis of various development typologies and the use of sensitivity analysis and headroom in PPEs analysis.

1.5 Finally, we consider whether ST15 is capable of sustaining CIL on any use within it and set out our conclusions.

2.0 General Approach to Viability Testing

2.1 The report prepared by PPE as the evidence base for the CIL consultation follows a relatively conventional approach. It carries out a series of development appraisals of scheme typologies which test whether these typologies would be capable of sustaining a CIL payment, and if so, at what level. The document concludes by advising levels of CIL which could viably be levied on different use types on different schemes within the CYC area.

2.2 The bulk of PPE's analysis focuses on a series of residential development typologies which although not specific to any particular scheme, reflect the type and character of schemes that might be delivered within the CYC area.

2.3 These typologies include greenfield and brownfield schemes in rural, city centre, urban and suburban locations, as well as large, medium and small size schemes. The use of typologies is supported and we agree that the typologies analysed reflect the form of development that is likely to come forward in York over the plan period.

2.4 In addition to the generic residential typologies described above, PPE has carried out an analysis of the major strategic sites in York which are set out in the emerging Local Plan.

2.5 Of particular relevance to these representations, is the analysis of site ST15 which is being promoted by LDP. It is noted however that the analysis of ST15 only includes the residential element of the scheme and does not consider the circa 7.4 acres of non-residential land which could be used for commercial development. We comment on this in more detail below.

2.6 In addition to the conventional residential typologies and site-specific analysis above, PPE also considers the impact of CIL on specialist residential development, such as retirement housing and extra care accommodation.

2.7 Finally, PPE looks at non-residential development including town centre offices, business parks, industrial/warehousing, convenience and comparison retail, supermarkets, hotels, student accommodation and care homes.

2.8 PPE's report considers whether and to what extent CIL could viably be levied on each use and development typology.

3.0 Sensitivity Analysis

3.1 We agree that it is appropriate to carry out sensitivity analysis to identify the impact of market change to the ability of each use or typology to sustain a CIL payment whilst remaining viable. It is however impossible to understand the detail of the sensitivities as the actual appraisals have not been provided within PPE's report.

3.2 We also note that whilst sensitivities can of course be run on many sets of assumptions, CIL should always be set on the basis of a worst-case scenario. From the sensitivities that have been produced by PPE we cannot see what this worst-case scenario is.

4.0 Analysis of the Ability of Residential Development on ST15 to Sustain the Community Infrastructure Levy

4.1 PPE's analysis of residential development on ST15 follows the same format as for all other residential types. PPE has provided Bidwells with the specific appraisal of ST15 which was not included in the published consultation document.

4.2 We agree that the assumptions behind it are sound and allow an accurate assessment to be produced.

4.3 On the basis of PPE's assumptions, ST15 provides a marginal negative headroom of £2 per sqm of private residential development, indicating that no CIL could be viably charged.

4.4 PPE's recommendation is therefore that residential development on ST15 should be zero rated for the purposes of CIL. We agree with this assumption.

4.5 PPE acknowledges that ST15 (in common with other large strategic sites) is burdened by significant infrastructure in order to open up the site and allow development, and that this contributes to the erosion of any headroom that might otherwise be seen and therefore removes the ability of the scheme to sustain a CIL payment.

4.6 When carrying out analysis of viability for the purposes of determining CIL, it is usual practice to indicate whether there is a viability "headroom," meaning that the scheme has a potential surplus viability which could be captured through CIL.

4.7 We note that in PPE's analysis, the residential development element of site ST15 is marginally unviable showing a negative headroom of £2 per sqm of private residential saleable area. As the total private residential saleable area states in PPE's appraisal of ST15 is 195,809 sqm this implies a total headroom deficit of £391,618.

4.8 The marginal nature of the headroom for ST15 is acknowledged by PPE. Furthermore, at paragraph 6.8 of their report, PPE states that even a headroom of £50 per sqm provides *"little room for any headroom buffers that should be allowed for setting CIL charges".*

4.9 Based on the total area of 195,809 sqm, a headroom of £50psm would equate to a total required surplus of £9,790,450 within the ST15 scheme.

4.10 The headroom deficit of £2 per sq m amounts to a headroom deficit of £391,618. A further £10,182,068 of land value would therefore be required in order for the residential development on ST15 to exceed the position whereby the surplus required to achieve the notional £50 per sq m headroom would be reached.

5.0 Local Centres at ST15

5.1 PPE's analysis of ST15 does not incorporate the non-residential uses that are required on the site, shown in the most recent land use budget as comprising circa 7.4 acres of land for one or more local centres. In our view, the viability of ST15 for CIL-setting purposes should be considered as a whole, including all uses.

5.2 The local centre(s) to be delivered on ST15 could potentially incorporate a larger scale food store, and other small convenience retail of the type to be found on similar new "garden village" developments.

5.3 PPE determines that it would be unviable for large food store developments to support a CIL charge. We agree with this and therefore make no further comment.

5.4 In addition to a larger food store onsite, it is likely that ST15 would have an element of small convenience retail within its local centre(s). We therefore make comments on PPE's analysis of this development typology as follows.

5.5 We agree that testing of a 266 sqm store is sensible, as it reflects the type of local convenience shop that is often delivered on new developments such as ST15.

5.6 PPE's analysis assumes that the land take by the convenience store will be 280 sqm (rounded to 0.03 hectares). Whilst we agree that it is appropriate for the store itself to be of this size, PPE's analysis makes no allowance for other elements which are necessary for the correct functioning of this type of retail including car parking, loading areas and public realm / landscaping.

5.7 In our experience the actual building size for small convenience retail on local centres is only around 30% of the total land take, with the remainder of the land take being given over to car parking, servicing and public realm. PPE's analysis fails to account for this space outside of the building and therefore its conclusion on viability of convenience retail is flawed.

5.8 PPE's analysis also appears to contain an error in respect of the residual land value of the site. PPE's appraisal adopts a residual land value of £105,234 for the 0.03 hectare retail site. Our analysis of PPE's appraisal shows that this is in fact the gross residual land value prior to deductions for purchasers' costs and sales and marketing costs.

5.9 The approach presented within PPE's report for small convenience retail is inconsistent with the remainder of the analysis within their report, which adopts the net residual land value for comparison with the benchmark land value.

5.10 We consider that the true net residual land value generated by PPE's analysis of small convenience retail should be £75,550. This represents the amount that the landowner receives and it is therefore correct for this to be compared to the site benchmark value. This means a net residual land value per hectare of circa £2.5 million, and per net acre of circa £1 million.

5.11 The figures above however, are based on the area of the building itself only. On our assumption that the building would take only 30% of the overall land take for a convenience retail facility the site area increases from 0.03 hectares to 0.1 hectares. This means that the residual land value of the retail and convenience store is actually £755,500 per hectare rather than the £2.5 million set out above.

5.12 On this basis, the residual land value per gross hectare falls significantly below the adopted benchmark land value of £2 million per gross hectare, and therefore in our view no small retail convenience store of the type delivered on a new greenfield development could be expected to be able to sustain CIL.

5.13 More generally, we find the assumptions that PPE have adopted to arrive at the residual land value for small convenience retail to be reasonable, although we do consider that there is insufficient evidence for them to be able to draw a conclusion that a rent of £215 per sqm for a small local convenience store is a reasonable assumption.

5.14 No sensitivity analysis has been done on the impact of changes in the level of rent that is achievable, but in any case, in our view, this should be immaterial as if a rent is lower than £215 per sqm the ability of small local convenience retail to sustain CIL would be damaged even further.

5.15 Finally, we note that although PPE include a rent-free period of nine months in their analysis of small convenience retail, it is likely that on a strategic site such as ST15 further incentives would be required to secure an operator prior to the point where what they would consider a "critical mass" of development for trading purposes would be present.

5.16 These incentives could include a longer rent-free period or a reduced rent until a target number of housing completions is achieved, both of which would impact (negatively) on viability.

6.0 The Ability of Local Centres to Contribute to Reducing the Residential Headroom Deficit at ST15

6.1 As is acknowledged above, PPE has not included an allowance for the positive contribution to land value made by non-residential uses to be delivered as part of ST15.

6.2 As noted above, the illustrative masterplan and land budget for ST15 envisage circa 7.4 acres of land which would be capable of generating positive land value through the delivery of one or more local centres incorporating commercial floor space. Delivery of this amount of local centre space contributes to an overall developable to gross area ratio of circa 60%, in line with garden village principles/

6.3 Given that a further £10,182,068 of land value would be required for ST15 to exceed the £50 per sqm CIL headroom requirement, each of the circa 7.4 acres identified for local centre uses would need to achieve a serviced land value of £1,375,955 per acre.

6.4 LDP's current masterplan proposals identify circa 1.5 acres of land which could be used for a food store, and therefore a balance of 5.9 acres of land which could be used for mixed use commercial development most likely in the form of one or more local centres.

6.5 Our assessment is that land for food stores would generate a serviced land value of £1 million per acre, and that other mixed-use development would generate a serviced land value of £400,000 per acre.

6.6 When considered together, the total serviced land value from non-residential uses on ST15 would be circa £3.86million. This amount is far short of the £10.2m required in order for the CIL headroom of £50 per sqm of private residential development to be achieved.

7.0 Other Uses that could Contribute to the Headroom Gap

7.1 LDP has prepared illustrative masterplans on the assumption of delivery of 3.339 homes and circa 7.4 acres of land for local centres. The above development adopts a gross to developable area ratio of circa 60%, in line with established garden village development principles.

7.2 Working within these parameters of developable and non-developable areas, there is potential for other uses to be delivered on ST15 in lieu of the current envisaged uses within the local centres.

7.3 PPE's report sets out a series of achievable land values as follows:

USE	RESIDUAL LAND VALUE (PER HECTARE)	RESIDUAL LAND VALUE (PER ACRE)
Residential – Medium Greenfield Typology	£2,031,486	£822,144
Retirement Living	£1,718,780	£695,567
Student (100-bed typology)-	£2,815,682	£1,139,468
Small convenience retail (assuming 30% net / gross coverage)	£755,500	£305,740

7.4 As noted above, in order to eradicate the headroom deficit generated by residential uses on ST15, a serviced land value from other uses would need to be £1,375,955 per acre.

7.5 As can be seen from the above table, none of the alternative uses that PPE proposed as being appropriate for a CIL levy of greater than zero would be capable of generating this per acre land value.

8.0 Conclusions

8.1 PPE recommends that residential development on ST15 should be zero rated as there is insufficient headroom to allow for a CIL to be charged. We agree with this conclusion.

8.2 PPE recommends a number of other uses for which CIL should be levied on new development across the City of York. Some of these uses have the potential to be included as part of the ST15 development. These uses are sheltered / retirement accommodation, student housing, and small convenience retail.

8.3 None of these uses would be capable of generating a land value sufficient to eradicate the headroom deficit for the residential element of ST15, given the circa 7.4 acres of land that would be available under the illustrative masterplan.

8.4 PPE acknowledges that delivery of ST15 is challenging due to the significant amount of infrastructure required to open up the site. LDP and PPE have worked together to agree the infrastructure costs and other abnormal costs based on the current indicative proposals, and these costs need to be managed on an ‘all uses’ and ‘whole site’ basis as part of aligning work in progress with the available funding.

8.5 It is an established principle of viability analysis for planning that the entirety of the “red line” of a planning application should be considered. We consider that the same principle should be applied to the analysis of the ability of strategic developments such as ST15 to sustain CIL.

8.6 We consider that there is insufficient headroom within ST15 when it is considered as a whole for any type of CIL to be charged.

8.7 We therefore conclude that in our opinion site ST15 should be zero rated for CIL purposes in its entirety regardless of the land use contained within it.

BIDWELLS

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #57 –

COMPLETE

Started:	Monday, February 27, 2023 11:46:39 AM
Last Modified:	Monday, March 27, 2023 9:01:34 PM
Time Spent:	Over a week
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

[redacted]

Contact details:

Organisation (optional)	O'Neill Associates
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Yes - See attached representation document

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

See attached representation document summitted in response to Question 1a

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

No - See attached representation document summitted in response to Question 1a

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Yes - See attached representation document summitted in response to Question 1a

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Yes - See attached representation document summitted in response to Question 1a

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Yes - See attached representation document summitted in response to Question 1a

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Yes - See attached representation document summitted in response to Question 1a

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Yes - See attached representation document summitted in response to Question 1a

Q22

9a. Do you have any other comments on the CIL evidence base?

Yes - See attached representation document summitted in response to Question 1a

O'Neill ASSOCIATES

Chartered Town Planning Consultants

City of York Community Infrastructure Levy Consultation

27 March 2023

Response on behalf of Galtres Garden Village Development Company

INTRODUCTION

i. These representations are made on behalf of Galtres Garden Village Development Company (GGVDC) in response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023.

ii. The Council's decision to introduce a CIL is welcomed because it provides greater certainty in terms of development costs, however the evidence base and charging schedule is fundamentally flawed and unsound.

iii. There has been no meaningful consultation with the development industry prior to the publication of the consultation documentation, except for a workshop with development industry representatives on 22 September 2016. Paragraph 1.11 of the CIL Viability Study (CVS) states that little further evidence was submitted to inform the assumptions in the CVS. However, the presentation at the workshop stated that there would be a public consultation on the preliminary draft charging schedule before this formal consultation period.

iv. It is hugely disappointing that the consultation on the preliminary draft charging schedule has not happened, as promised, and a significant weakness of the CIL evidence base that it has not been properly informed by specialists who work in the development industry day to day Planning Practice Guidance (PPG) Viability (paragraph 2, Reference ID: 10-002-20190509 states that "*It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers*"

v. The CIL is proposed at a time of considerable uncertainty in terms of both the economy, and central government's changes to the developers contributions regime proposed by the Levelling Up and Regeneration Bill. At the time of writing inflation was expected to be falling but instead has increased to 10.4% (up from 10.1%) and interest rates have risen for 4.0% to 4.25%.

vi. This wider economic picture of rising costs has fed through to rapidly increasing construction costs. Barbour ABI, the market leading provider of construction project information, reported that "Price rises were at record levels over summer 2022, with many goods seeing 25 per cent annual inflation. This has now dropped closer to 15 per cent, but some products still hover well above 20 per cent and insulation products have recently jumped to 50 per cent.

vii. Against this uncertain economic background, the government has decided to delay the full introduction of its proposed new Infrastructure Levy by up to 10 years due to uncertain of impact on the delivery of development. These same uncertainties exist with the current CIL system.

viii. We request to be notified about:
- submission of the CIL Draft Charging Schedule to the Examiner in accordance with Section 212 of the Planning Act 2008;
- the publication of the recommendations of the Examiner and the reasons for those recommendations; and
- the adoption of the charging schedule by the charging authority.

ix. In accordance with Regulation 21 of the CIL Regulations 2010 we wish to exercise our right to be heard by the examiner either as a consortium or as an independent stakeholder organisation.

x. The questions (1-9) posed by the Council as part of this consultation and our responses are set out below.

QUESTIONS AND RESPONSES

1) Do you have any comments of the content of the CIL viability study?

Response

i. There is no Infrastructure Funding Statement as part of the consultation. As such it is unclear what will be delivered through CIL and what will be required to be provided by developers through s106 obligations to make a development acceptable in planning terms. Without this detail, it is not possible to fully understand the viability position of schemes.

ii. The Council's approach to on-site open space provision highlights this issue. Currently, the Council applies Policy GI6 (new open space provision) of the Publication Draft Local Plan states 'all residential development proposals should contribute to the provision of open space for recreation and amenity. This is based The Open Space and Green Infrastructure Update 2017 (referred to in the local policy) which requires 40.5 sq m of amenity space for a 1 bed dwelling and 17.8 sq m towards sports. This is not typically possible to provide for on urban sites proposing even low densities (there is not the space). As such the Council typically requires an off-site contribution.

iii. Clearly, both on site and/or s106 contributions have a significant impact on viability which has not been considered in the CIL viability study. An example of the application of open space policy/ contributions can be found with reference to planning permission 19/00979/OUTM dated 1 July 2020 which relates to a former gas works that had viability issues even without CIL and therefore would have been undeliverable if the draft CIL charging schedule was applied

iv. Similarly, the Council's approach to sustainable travel contributions and travel plan obligations which are also applied and are not considered as part of the CIL evidence base.

v. Although the CVS takes account of S106 obligations the assumption about values and costs are averages. Paragraph 5 of the Consultation Information Booklet published with the CVS is explicit in stating "it is not required, and would be impossible, to look at every type of development individually, hence the use of typologies.

vi. In practical terms what this means is that where a residential scheme liable for CIL has higher development costs that affect viability, and given that CIL is non-negotiable, it is the section 106 requirements such as affordable housing, that will be negotiated down. Delivery of affordable housing is a key objective of the emerging local plan which will be severely threatened by the introduction of the draft CIL Charging Schedule. Similarly, the Council has fallen short of its local plan targets for housing delivery for many years which is likely to worsen rather than address the existing backlog.

vii. The potential impact of the CIL on affordable housing delivery is particularly relevant go the GGVDC. The company's proposal for a new Garden Village includes affordable housing proviso at 40% - higher than the maximum level of 30% set out in Policy H10 of the Draft Plan. The residential CIL rate of £200 would severely impact on the delivery of this level of affordable housing or would impact on the viability of the scheme or both.

viii. Paragraph 4.44 of the CVS states that brownfield sites are assumed to include the necessary strategic infrastructure from their existing or previous use. However, this assumption understates the requirement on many brownfield sites to provide reinforced or completely new infrastructure. For example, the Council's drainage and flood risk policies require a 30% betterment for surface water drainage/ SuDS, and flood risk mitigation. As the Local Plans spatial strategy directs development to brownfield sites and the urban area this requirement will impact on a considerable number of development schemes

ix. Similarly, the majority of the city centre is located within an area of archaeological importance, and historic core conservation area. Both of these designations, and associated local plan policies increase development costs and have significant viability implications which are overlooked by the CVS.

x. Viability evidence base is outdated and doesn't take any account of significant shifts in market conditions in Q3/4 2022.

xi. Viability evidence relies on RICS BCIS build costs. We understand that other respondents have submitted evidence to demonstrate that these costs are too low and backward facing, particularly at a time of persistent high inflation.

xii. The Planning Practice Guidance (PPG) plan making (paragraph: 039 Reference ID: 61-039-20190315) requires local planning authorities to "*prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable*". This has not been undertaken for the emerging local plan in relation to its latest iteration given most policies have been subject to change during the course of the local plan examination.

xiii. Similarly, National Planning Policy Framework paragraph 34, and PPG Paragraph: 002 Reference ID: 10-002-20190509 states that "*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that* *the total cumulative cost of all relevant policies will not undermine deliverability of the plan."*

xiv. The latest modifications to the emerging local plan increase policy requirements for most developments, particularly major developments. These policies have a cumulative cost impact when taken together. The Council does not appear to have fully considered how sites can also bear CIL given this demanding policy context. A full viability review and justifiable evidence of the modified policy requirements will be necessary. Policy requirements include (not exhaustive), the majority of which are not considered in the CVS:

a) 75% carbon reduction aspirations – policy CC2 (modification) (this is considered within CIL Viability study)
b) 10% Bio diversity net gain (this is considered within CIL Viability study)

c) Accessible Housing Standards (this is considered within CIL Viability study)

d) Archaeology – much of the city centre is within an archaeology area of importance which, taken on its own, gives rise to considerable risk and significant additional development costs

e) H10(i) states "higher rates of (affordable housing) provision will be sought where development viability is not compromised". This implies that development may be subject to additional affordable housing if it can be viably provided, and that a viability assessment will be required for all applications over 5 units which will delay the determination period significantly, particularly given to limited capacity of the district valuer. Policy H10 requires all viability assessments to be reviewed by the district valuer.

f) Changes to policy H7 and the requirement for nominations agreements.

g) Air Quality assessments/mitigation for all major applications

h) Flood mitigation measures. Policy requires a 30% betterment for surface water runoff which typically requires attenuation or SuDS, and much of the city centre is within high flood risk area. Again, taken on its own, flood mitigation gives rise to considerable risk and significant additional development costs.

i) Heritage policy. The vast majority of the city centre is within the York Historic Core Conservation Area and contains amongst the highest concentration of listed buildings and scheduled ancient monuments in England. These heritage constraints arising from national and local heritage policies, taken on their own, flood mitigation gives rise to considerable risk and significant additional development costs.

j) Travel Plan obligations e.g. car clubs, free bus travel, cycle equipment contributions, travel plan coordinator.

k) Green infrastructure/ on-site open space provision – the local plan including its evidence base prescribes totally undeliverable targets with regards for open space as part of new development and currently s106 payments are sought for any shortfall. Will this now be provided through CIL and does this mean no on site provision is required? If not, on site provision has significant viability impacts.

2) Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusion of the CIL Viability Study?

Response

No, the conclusions of the CVS is fundamentally flawed, contains a number of errors and does not justify the draft CIL charging schedule, for the reasons set out below:

i. the proposed rate or rates would seriously undermine the deliverability of the emerging local plan, particularly with regards to residential delivery; delivery of affordable housing; new open space delivery; and brownfield first principles, amongst others.

ii. It is essential that the CIL rates are set at a level which ensures that most developments remain robustly viable over time as development costs change – most likely upwards. As such CIL rates should not be set at a marginal viable point. It is vital for the Council to build in a significant degree of flexibility to ensure durability of the CIL charging schedule. The submitted evidence has been overtaken by rapidly changing economic circumstances and an evolving planning policy context and fails to take account of the following, amongst other aspects:

a. National consultations on changes to NPPF and CIL
b. Changes in the housing market and house prices

c. Changes in inflation, interest rates and the cost of borrowing
d. Changes in build costs

iii. The residential rates are too high, unjustified and are amongst the highest, if not the highest across the entirety of Yorkshire and Humber, even when allowing for indexation since adoption in other charging authorities. The Council has not provide comprehensive, robust and up-to-date justification for these charges as required by regulation 14(1) of the CIL Regulations (as amended).

iv. The CVS has not properly understood development costs, particularly for brownfield sites. The notion that allocated sites within the local plan incur greater development costs than other residential sites in unjustified. Significantly, the CVS has not adopted a comprehensive and robust 'policy on' approach with the full cost of the emerging local plan policies (including affordable housing) being accounted for, and taking precedence over, the introduction of CIL rate setting.

v. Planning applications will no longer be submitted for retail uses, instead they will refer to Class E of the use class order. How will the Council apply the charging schedule to planning permissions that simply apply for class E and do not distinguish between retail or office for example?

vi. It is counter-intuitive that development costs of brownfield sites are lower than greenfield sites for Extra Care accommodation. The proposed CIL rates are contrary to Government and local plan objectives of brownfield first.

3) Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Response

No, the proposed CIL rates do not support delivery of the emerging local plan and would have a disastrous effect on local development projects for the reasons set out below:

i. The 'appropriate balance' is the level of CIL which maximises the delivery of development and supporting infrastructure in the area. This has not been justified and there is a lack of clarity in how the CIL will be allocated and spent.

ii. The *CIL Infrastructure Funding Gap Assessment (IFGA)* and *Consultation Information Booklet (CIB)* documents issued with the Draft Charging Schedule set out to identify the cost of infrastructure required to support new development and where it is to be spent. However, there is a lack of clarity between the documents. For example, the IFGA identifies a cost of £47.3 million required for “Education”. However, section 10 of the CIB, states that Infrastructure for the purposes of CIL spend “can” include transport, flood defences, schools, hospitals and other health and social care facilities.

iii. This provides no certainty or clarity, for example, for residential developers as to whether they will be paying CIL and a Section 106 contribution for education; flood alleviation; or health facilities.

iv. The Charging Schedule therefore needs to state clearly what the CIL will be spent on so that developers can make a proper assessment of whether the CIL and S106 costs on a scheme be viable or whether necessary development will be inhibited.

4) Do you have any comments on the proposed CIL rates?

Response

i. We would question the appropriateness of the proposed CIL rates given the current uncertain economic environment facing the property and construction sectors. Viability is becoming more challenging as high levels of inflation in build costs are proving persistent and sales values remain static or at best are increasing at below the rate of build cost inflation.

ii. With regards to the Residential CIL rate, this must be considered in the context of the acknowledged poor delivery of housing in the City over a long run period. Evidence we have presented to the Local Plan Examination, using the Councils own data, demonstrates that in the 10 years 2013/13 to 2021/22, house completion rates fell below the OAH of 790 in 7 of those years. However, the Council’s housing completion data includes student accommodation. If student accommodation is excluded, housing completions fell below the OAHN for 9 of the 10 years.

iii. Furthermore, the Council’s Housing trajectory set out in supporting evidence to the Local Plan Examination, shows that a cumulative undersupply of housing will persist until 2023/24 – i.e. 7 years into the Plan period. Our analysis indicates it will persist until 2024/25, 8 years into the Plan period (See Appendix A).

iv. In this context of long-term undersupply of housing, the imperative is clearly to implement the NPPF requirement to significantly boost the supply of housing. Against this background, the proposed £200 psm rate for housing, the highest rate in the Yorkshire region, seems clearly anomalous and could seriously impede the delivery of housing so desperately required to make good more than a decade of undersupply.

5) Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed

Response

i. The CIL viability report should be updated to account for changed economic circumstances and current build costs and values.

6) Do you have any comments on the draft Instalments Policy?

Response

Yes, as set out below:

ii. The is no certainty with regards to larger schemes over £500,000. For example, what happens if the developer and Council are unable to agree a project specific payment schedule?

7) Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Response

i. Development schemes that provide for a higher level so affordable housing than required by policy should be eligible for discretionary relief.

8) Do you have any other comments on the draft CIL Charging Schedule?

Response

We reserve the right to update our evidence at the Examination taking account to circumstances prevailing at the time.

9) Do you have any other comments on the CIL evidence base?

Response

We reserve the right to update our evidence at the Examination taking account to circumstances prevailing at the time.

APPENDIX A

Table 1 Revision to the "Table 1 CYC Housing Trajectory, August 2022" in Housing Trajectory Note August 2022 CYC/EX/107/1

Table 1 Galtres revision to the "Table 1 CYC Housing Trajectory, August 2022" in Housing Trajectory Note August 2022 CYC_EX_107_1

		TOTAL	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	Total for Plan Period	33/34	34/35	35/36	36/37	37/38	Total 5 yr post plan	Post 2038
1. Net Housing Completions 2017 to 2020			**Actual Completions**																							
	Net Housing Completion		1296	449	560	622	402												3329						0	
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		35	2	67	82	252												438						0	
Total			1331	451	627	704	654												3767							
2. Housing Allocations Below 5 ha (H Sites)																										
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607									215		392						607						0	
H3	Burnholme School	83							63	15	5								83						0	
H5	Lowfield School	165						69	24										93						0	
H7	Bootham Crescent	93						25	35	33									93						0	
H8	Askham Bar Park & Ride	60									35	25							60						0	
H10	The Barbican	187											187						187						0	
H20	Former Oakhaven EPH									36									36						0	
H29	Land at Moor Lane Copmanthorpe	92							2	40	50								92						0	
H31	Eastfield Lane Dunnington	82						6	40	37									83						0	
H38	Land RO Rufforth Primary School Rufforth	21							10	11									21						0	
H39	North of Church Lane Elvington	32									17	15							32						0	
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	117							20	35	40	22							117						0	
H52	Willow House EPH, 34 Long Close Lane	15									15								15						0	
H53	Land at Knapton Village	4									4								4						0	
H55	Land at Layerthorpe	20										20							20						0	
H56	Land at Hull Road	0					0												0						0	
H58	Clifton Without Primary school	15								15									15						0	
Annualised Projected Completions H Sites (Hide)						**0**	**0**	**100**	**194**	**222**	**381**	**82**	**579**	**0**	**0**	**0**	**0**	**0**	1558	**0**	**0**	**0**	**0**	**0**	0	
3. Housing allocations above 5ha (ST Sites)																										
ST1a	British Sugar/Manor School	1100										150	150	150	150	150	150	150	1050	50					50	
ST1b	Manor School	100											35	35	30				100						0	0
ST2	Former Civil Service Sports Ground Millfield Lane	263				0		53	78	52	50	30							263						0	
ST4	Land Adj. Hull Road and Grimston Bar	211									35	40	40	40	40	16			211						0	0
ST5	York Central	2500									45	107	107	107	107	119	119	119	830	119	143	143	143	143	691	979
ST7	Land East of Metcalfe Lane	845										50	90	120	120	120	120	120	740	105					105	0
ST8	Land North of Monks Cross	970								30	70	100	100	100	100	100	100	100	800	100	70				170	0
ST9	Land North of Haxby	735										45	90	90	90	90	90	90	585	90	60				150	0
ST14	Land to West of Wigginton Road	1348										60	60	160	160	160	160	160	920	160	160	108			428	0
ST15	Land to West of Elvington Lane	3339											35	70	105	105	105	140	560	210	210	280	280	280	1260	1519
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22						21											21						0	
ST16	Terrys Extension Site - Terrys Car park (Phase 2)	0																	0						0	0
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	0																	0						0	0
ST17	Nestle South (Phase 1)	279							279										279						0	0
ST17	Nestle South (Phase 2)	425								35	35	35	35	35	35	35	35	22	302						0	123
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158								35	35	35	35	18					158						0	0
ST32	Hungate (Phases 5+) (Blocks D & H)	375									196				179				375						0	0
ST33	Station Yard Wheldarke	150								7	35	35	35	38					150						0	
ST36	Imphal Barracks, Fulford Road	769																100	100	100	100	100	100	100	500	169
Annualised projected Completions for ST Sites						**0**	**0**	**74**	**357**	**159**	**501**	**687**	**812**	**963**	**1116**	**895**	**879**	**1001**	7444	**934**	**743**	**631**	**523**	**523**	3354	2790
4. Projected Housing Completions From Non Allocated Unimplemented Consents																										
Total		**1713**						**483**	**333**	**363**	**250**	**105**	**143**	**36**		**0**	**0**	**0**	1713	**0**	**0**	**0**	**0**	**0**		
5. Projected completions from communal establishments and student accommodation																									0	
Total		**436**						**357**	**26**	**53**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	436	**0**	**0**	**0**	**0**	**0**	0	
																									0	
Supply Trajectory																									0	
Actual Net Completions (2017 to 2022)			1331	451	627	704	654												3767						0	
Projected Completions (all sites)						0	0	1014	910	797	1132	874	1534	999	1116	895	879	1001	11151	934	743	631	523	523	3354	
Windfalls						0	0	0	0	0	199	199	199	199	199	199	199	199	1592	199	199	199	199	199	995	
Actual and Projected Housing Completions (Inc Windfall Allowance)								1014	910	797	1331	1073	1733	1198	1315	1094	1078	1200	12743	1133	942	830	722	722	4349	
Cumulative Completions (Including Windfalls)			1331	1782	2409	3113	3767	4781	5691	6488	7819	8892	10625	11823	13138	14232	15310	16510		17643	18585	19415	20137	20859		
Requirement (790pa plus 32 under supply) 822dpa			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	13152	822	822	822	822	822	4110	
Cumulative Requirement			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152		13974	14796	15618	16440	17262	0	
Over/Under Suppy			**509**	**138**	**-57**	**-175**	**-343**	**-151**	**-63**	**-88**	**421**	**672**	**1583**	**1959**	**2452**	**2724**	**2980**	**3358**		**3669**	**3789**	**3797**	**3697**	**3597**	0	
																									0	
Detailed Trajectory (including 10% Non-Implementation Rate)																									0	
Projected Completions (all sites)			*0*	*0*	*0*	*0*	*0*	*1014*	*910*	*797*	*1132*	*874*	*1534*	*999*	*1116*	*895*	*879*	*1001*	*11151*	*934*	*743*	*631*	*523*	*523*	*3354*	
Projected Completions (all sites) - 10% Non-implementation Rate Applied			0	0	0	0	0	913	819	717	1019	787	1381	899	1004	806	791	901	10035.9	841	669	568	471	471	3018.6	
Windfall Allowance											199	199	199	199	199	199	199	199	1592	199	199	199	199	199	995	
Total Projected Completions (with 10% Non implementation rate applied and windfalls) + Actual completions 2017-2022			1331	451	627	704	654	913	819	717	1218	986	1580	1098	1203	1005	990	1100	15395	1040	868	767	670	670	4013.6	
Cumulative Completions (with 10% non implementation rate applied and windfalls)			1331	1782	2409	3113	3767	4680	5499	6216	7434	8419	9999	11097	12300	13305	14295	15395		16435	17302	18069	18739	19409		
Annual Target (Inclusive of Shortfall)			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	13152	822	822	822	822	822	4110	
Cumulative Annual Requirement (Inclusive of Shortfall)			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152		13974	14796	15618	16440	17262		
Over/Under Supply of Housing (calc = Cumulative completions - cumulative annual target)			**509**	**138**	**-57**	**-175**	**-343**	**-252**	**-255**	**-360**	**36**	**199**	**957**	**1233**	**1614**	**1797**	**1965**	**2243**		**2461**	**2506**	**2451**	**2299**	**2147**		
5 year housng supply																										
5 year requirement (822*5)							4110	4110	4110	4110	4110	4110	4110	4110	4110	4110	4110	4110								
Shortfall to be carried over remainag plan period (Absolute value of H)							343	227	165	0	0	0	0	0	0	0	0	0								
Shortfall within 5 years (5x(G=Remaining Plan Period) (Liverpool)							156	114	92	0	0	0	0	0	0	0	0	0								
20% buffer (0.2*(J+L))							853	845	840	822	822	822	822													
5% buffer (j*.05)														206	206	206	206	206								
Rolling total 5 year requirement (J+L+Buffer)							5119	5068	5042	4932	4932	4932	4932	4316	4316	4316	4316	4316								
Rolling 5 year land supply (Row D)							4652	5319	5598	6085	5871	5876	5396	5338	5002	4764	4444	4014								
Over/Under Supply (with NI applied) against total 5 year requirement (P-0)							-467	251	556	1153	939	944	464	1022	686	449	128	-302								
Land supply in Years (no account for previous oversupply)							4.54	5.25	5.55	6.17	5.95	5.96	5.47	6.18	5.80	5.52	5.15	4.65								
Rolling 5 year requirement (J=(M orN)-H)										*5292*	*4896*	*4733*	*3975*	*3083*	*2701*	*2519*	*2351*	*2073*								
Land Supply in years inclusive of past oversupply										*5.75*	*6.00*	*6.21*	*6.79*	*8.66*	*9.26*	*9.46*	*9.45*	*9.68*								

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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #53 –

INCOMPLETE

Started:	Monday, March 27, 2023 4:48:16 PM
Last Modified:	Monday, March 27, 2023 5:11:50 PM
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IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

[redacted]

Contact details:

Organisation (optional)	O'Neill Associates
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Please see attached documents

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Please see attached documents

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Please see attached documents

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Please see attached documents

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Please see attached documents

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Please see attached documents

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Please see attached documents

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Please see attached documents

Q22

9a. Do you have any other comments on the CIL evidence base?

Please see attached documents

Chartered Town Planning Consultants

City of York Community Infrastructure Levy Consultation

27 March 2023

Response on behalf of Askham Bryan College,

the University of York and York St John University

INTRODUCTION

i. These representations are made on behalf of Askham Bryan College, the University of York and York St John University in response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023.

ii. The representation is supported by and should be read in conjunction with the Technical Representation prepared by CBRE and submitted with this representation.

iii. The Council's decision to introduce a CIL is welcomed because it provides greater certainty in terms of development costs, however the evidence base and charging schedule is fundamentally flawed and unsound.

iv. There has been no meaningful consultation with the development industry prior to the publication of the consultation documentation, except for a workshop with development industry representatives on 22 September 2016. Paragraph 1.11 of the CIL Viability Study (CVS) states that little further evidence was submitted to inform the assumptions in the CVS. However, the presentation at the workshop stated that there would be a public consultation on the preliminary draft charging schedule before this formal consultation period. It is hugely disappointing that the consultation on the preliminary draft charging schedule has not happened, as promised, and a significant weakness of the CIL evidence base that it has not been properly informed by specialists who work in the development industry day to day. Planning Practice Guidance (PPG) Viability (§2, Reference ID: 10-002-20190509) states that:

"*It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers*"

v. The CIL is proposed at a time of considerable uncertainty in terms of both the economy, and Central Government's changes to the developers' contributions regime proposed by the Levelling Up and Regeneration Bill. At the time of writing the Government has published its consultation on The Infrastructure Levy, and inflation was expected to be falling but instead has increased to 10.4% (up from 10.1%) and interest rates have risen from 4.0% to 4.25%. This wider economic picture of rising costs has fed through to rapidly increasing construction costs. Barbour ABI, the market leading provider of construction project information, reported that:

"Price rises were at record levels over summer 2022, with many goods seeing 25 per cent annual inflation. This has now dropped closer to 15 per cent, but some products still hover well above 20 per cent and insulation products have recently jumped to 50 per cent."

vi. Against this uncertain economic background, the Government has suggested a delay the full introduction of its proposed new Infrastructure Levy by up to 10 years due to uncertain of impact on the delivery of development. These same uncertainties exist with the current CIL system.

vii. We request to be notified about:

- submission of the CIL Draft Charging Schedule to the Examiner in accordance with Section 212 of the Planning Act 2008;
- the publication of the recommendations of the Examiner and the reasons for those recommendations; and
- the adoption of the charging schedule by the charging authority.

viii. In accordance with Regulation 21 of the CIL Regulations 2010 we wish to exercise our right to be heard by the examiner either as a consortium or as an independent stakeholder organisation.

ix. The questions (1-9) posed by the Council as part of this consultation and our responses are set out below.

QUESTIONS AND RESPONSES

1) Do you have any comments of the content of the CIL viability study?

Response

Yes, as set out below.

i. There is no Infrastructure Funding Statement as part of the consultation. As such it is unclear what will be delivered through CIL and what will be required to be provided by developers through S106 obligations to make a development acceptable in planning terms. Without this detail, it is not possible to fully understand the viability position of schemes. The Council's approach to on-site open space provision highlights this issue. Currently, the Council applies Policy GI6 (new open space provision) of the Publication Draft Local Plan which states:

"all residential development proposals should contribute to the provision of open space for recreation and amenity."

This is based The Open Space and Green Infrastructure Update 2017 (referred to in the local policy) which requires 40.5 sq m of amenity space for a 1 bed dwelling and 17.8 sq m towards sports. This is not typically possible to provide for on urban sites proposing even low densities, there is not the space. As such the Council typically requires an off-site contribution. Clearly, both on site and/or S106 contributions have a significant impact on viability which has not been considered in the CIL viability study. An example of the application of open space policy/ contributions can be found with reference to planning permission 19/00979/OUTM dated 1 July 2020 which relates to a former gas works that had viability issues even without CIL and therefore would have been undeliverable if the draft CIL charging schedule was applied.

ii. Similarly, the Council's approach to sustainable travel contributions and travel plan obligations which are also applied and are not considered as part of the CIL evidence base.

iii. Although the CVS takes account of S106 obligations the assumption about values and costs are averages. Paragraph 5 of the Consultation Information Booklet published with the CVS is explicit in stating:

"it is not required, and would be impossible, to look at every type of development individually, hence the use of typologies."

In practical terms what this means is that where a residential scheme liable for CIL has higher development costs that affect viability, and given that CIL is non-negotiable, it is the section 106 requirements such as affordable housing, that will be negotiated down. Delivery of affordable housing is a key objective of the emerging local plan which will be severely threatened by the introduction of the draft CIL Charging Schedule. Similarly, the

Council has fallen short of its local plan targets for housing delivery for many years which is likely to worsen rather than address the existing backlog.

iv. Paragraph 4.44 of the CVS states that brownfield sites are assumed to include the necessary strategic infrastructure from their existing or previous use. However, this assumption understates the requirement on many brownfield sites to provide reinforced or completely new infrastructure. For example, the Council's drainage and flood risk policies require a 30% betterment for surface water drainage/ SuDS, and flood risk mitigation. As the Local Plans spatial strategy directs development to brownfield sites and the urban area this requirement will impact on a considerable number of development schemes.

v. Similarly, the majority of the city centre is located within an area of archaeological importance, and historic core conservation area. Both of these designations, and associated local plan policies increase development costs and have significant viability implications which are overlooked by the CVS.

vi. The viability evidence base is outdated and doesn't take any account of significant shifts in market conditions in Q3/4 2022. This matter is considered in detail in the CBRE representation.

vii. Viability evidence relies on RICS BCIS build costs. The supporting CBRE report finds these are too low and backward facing. For example, PBSA cannot be built at the costs being assumed and there are a number of errors which, if corrected, would erode any viability headroom for PBSA.

viii. The Planning Practice Guidance (PPG) plan making (paragraph: 039 Reference ID: 61-039-20190315) requires local planning authorities to:

"*prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable*".

This has not been undertaken for the emerging local plan in relation to its latest iteration given most policies have been subject to change during the course of the local plan examination.

ix. Similarly, National Planning Policy Framework paragraph 34, and PPG Paragraph: 002 Reference ID: 10-002-20190509 states that:

"*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic,* *and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."*

x. The latest modifications to the emerging local plan increase policy requirements for most developments, particularly major developments. These policies have a cumulative cost impact when taken together. The Council does not appear to have fully considered how sites can also bear CIL given this demanding policy context. A full viability review and justifiable evidence of the modified policy requirements will be necessary. Policy requirements include (not exhaustive), the majority of which are not considered in the CVS:

a) 75% carbon reduction aspirations – policy CC2 (modification) (this is considered within CIL Viability study)

b) 10% Biodiversity net gain (this is considered within CIL Viability study)

c) Accessible Housing Standards (this is considered within CIL Viability study)

d) Archaeology – much of the city centre is within an archaeology area of importance which, taken on its own, gives rise to considerable risk and significant additional delay and development costs

e) H10(i) states:

"higher rates of (affordable housing) provision will be sought where development viability is not compromised".

This implies that development may be subject to additional affordable housing if it can be viably provided, and that a viability assessment will be required for all applications over 5 units which will delay the determination period significantly, particularly given to limited capacity of the District Valuer. Policy H10 requires all viability assessments to be reviewed by the District Valuer.

f) Changes to policy H7 and the requirement for nominations agreements.

g) Air Quality assessments/mitigation for all major applications

h) Flood mitigation measures. Policy requires a 30% betterment for surface water runoff which typically requires attenuation or SuDS, and much of the city centre is within high flood risk area. Again, taken on its own, flood mitigation gives rise to considerable risk and significant additional development costs.

i) Heritage policy. The vast majority of the city centre is within the York Historic Core Conservation Area and contains amongst the highest concentration of listed buildings and scheduled ancient monuments in England. These heritage constraints arising from national and local heritage policies, taken on their own, gives rise to considerable risk and significant additional development costs.

j) Travel Plan obligations e.g. car clubs, free bus travel, cycle equipment contributions, travel plan coordinator.

k) Green infrastructure/ on-site open space provision – the local plan including its evidence base prescribes totally undeliverable targets with regards for open space as part of new development and currently S106 payments are sought for any shortfall. Will this now be provided through CIL and does this mean no on site provision is required? If not, on site provision has significant viability impacts.

2) Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusion of the CIL Viability Study?

Response

No, the conclusions of the CVS are fundamentally flawed, contain a number of errors and do not justify the draft CIL charging schedule, for the reasons set out below:

i. The proposed rate or rates would seriously undermine the deliverability of the emerging local plan, particularly with regards to residential completions, PBSA completions, delivery of affordable PBSA and housing, new open space delivery, and brownfield first principles, amongst others.

ii. It is essential that the CIL rates are set at a level which ensures that most developments remain robustly viable over time as development costs change – most likely upwards. As such CIL rates should not be set at a marginal viability point. It is vital for the Council to build in a significant degree of flexibility to ensure durability of the CIL charging schedule. The submitted evidence has been overtaken by rapidly changing economic circumstances and an evolving planning policy context and fails to take account of the following, amongst other aspects:

a. National consultations on changes to NPPF and CIL
b. Changes in the housing market and house prices
c. Changes in inflation, interest rates and the cost of borrowing
d. Changes in build costs

iii. The residential rates are too high, unjustified and are amongst the highest, if not the highest across the entirety of Yorkshire and Humber, even when allowing for indexation since adoption in other charging authorities. The Council has not provided comprehensive, robust and up-to-date justification for these charges as required by regulation 14(1) of the CIL Regulations (as amended). This is not the case, as shown in the detailed evidence prepared by CBRE that accompanies this response.

iv. The CVS has not properly understood development costs, particularly for brownfield sites. The notion that allocated sites within the local plan incur greater development costs than other residential sites in unjustified. Significantly, the CVS has not adopted a comprehensive and robust 'policy on' approach with the full cost of the emerging local plan policies (including affordable housing) being accounted for, and taking precedence over, the introduction of CIL rate setting.

v. The proposed PBSA CIL rates are also too high and unjustified. By increasing the cost of student housing, it will reduce the affordability of student accommodation for which there is an immediate and growing need. The CIL rates in relation to student accommodation seriously risk constraining PBSA development, which is contrary to the Council's stated aims of supporting and encouraging Askham Bryan College and the universities' growth and sustainability, and also its draft economic strategy.

vi. Planning applications will no longer be submitted for retail uses, instead they will refer to Class E of the use class order. How will the Council apply the charging schedule to planning permissions that simply apply for class E and do not distinguish between retail or office for example?

vii. It is counter-intuitive that development costs of brownfield sites are lower than greenfield sites for Extra Care accommodation. The proposed CIL rates are contrary to Government and local plan objectives of brownfield first. It is understood that other parties will submit viability evidence challenging the draft CIL charging rates for retirement living.

3) Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Response

No, the proposed CIL rates do not support delivery of the emerging local plan and would have a disastrous effect on local development projects for the reasons set out below:

i. The ‘appropriate balance’ is the level of CIL which maximises the delivery of development and supporting infrastructure in the area. This has not been justified and there is a lack of clarity in how the CIL will be allocated and spent.

ii. The *CIL Infrastructure Funding Gap Assessment (IFGA)* and *Consultation Information Booklet (CIB)* documents issued with the Draft Charging Schedule set out to identify the cost of infrastructure required to support new development and where it is to be spent. However, there is a lack of clarity between the documents. For example, the IFGA identifies a cost of £47.3 million required for “Education”. However, section 10 of the CIB, states that Infrastructure for the purposes of CIL spend “can” include transport, flood defences, schools, hospitals and other health and social care facilities.

iii. This provides no certainty or clarity, for example, for residential developers as to whether they will be paying CIL and a Section 106 contribution for education; flood alleviation; or health facilities.

iv. The Charging Schedule therefore needs to state clearly what the CIL will be spent on so that developers can make a proper assessment of whether the CIL and S106 costs on a scheme be viable or whether necessary development will be inhibited.

4) Do you have any comments on the proposed CIL rates?

Response

Yes, as set out below:

i. The CBRE report provides a detailed analysis of the proposed CIL rates, particularly the residential and PBSA rates, and questions their appropriateness given the current uncertain economic environment facing the property and construction sectors. Viability is becoming more challenging as high levels of inflation in build costs are proving persistent and sales values remain static or at best are increasing at below the rate of build cost inflation.

ii. With regards to the Residential CIL rate, this must be considered in the context of the acknowledged poor delivery of housing in the city over a long run period. Evidence we have presented to the Local Plan Examination, using the Council's own data, demonstrates that in the 10 years 2013/13 to 2021/22, house completion rates fell below the OAH of 790 in 7 of those years. However, the Council's housing completion data includes student accommodation. If student accommodation is excluded, housing completions fell below the OAHN for 9 of the 10 years.

iii. Furthermore, the Council's Housing trajectory set out in supporting evidence to the Local Plan Examination, shows that a cumulative undersupply of housing will persist until 2023/24 – i.e. 7 years into the Plan period. Our analysis indicates it will persist until 2024/25, 8 years into the Plan period (See Appendix A).

iv. In this context of long-term undersupply of housing, the imperative is clearly to implement the NPPF requirement to significantly boost the supply of housing. Against this background, the proposed £200 psm rate for housing, the highest rate in the Yorkshire region, seems clearly anomalous and could seriously impede the delivery of housing so desperately required to make good more than a decade of undersupply.

5) Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed

Response

i. Please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

6) Do you have any comments on the draft Instalments Policy?

Response

Yes, as set out below:

ii. There is no certainty with regards to larger schemes over £500,000. For example, what happens if the developer and Council are unable to agree a project specific payment schedule?

iii. Please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

7) Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Response

i. Yes, please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

8) Do you have any other comments on the draft CIL Charging Schedule?

Response

Yes, as set out below:

i. Please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

ii. The draft CIL Charging Schedule of rates is not well written, particularly in respect of PBSA development.

iii. The definitions are ambiguous e.g. it is unclear what happens in circumstances where PBSA cannot viably provide affordable housing. Will it be subject to CIL because it falls within PBSA without affordable housing? Clearly, if a PBSA scheme cannot support and affordable housing requirement, it is equally, unlikely to be able to support CIL requirement in which case development of necessary student accommodation would be stifled.

9) Do you have any other comments on the CIL evidence base?

Response

i. Yes, please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

(ref: ulp2303.CIL reps.v6)

The University's Student Housing Affordability Regime in relation to the Emerging York Local Plan Modifications **23 March 2023**

Harvey Dowdy Director of Technology, Estates and Facilities

1.0 Student Housing Provision in York

1.1 A recent report by Unipol commissioned for the University of York (UoY) and York St John University (YSJU) stated that in 2021-22 there were 27,260 full time students studying in York. Of these, 11% are in PBSA and 31.4% in private rented accommodation. A total of 30.8% live in University of York maintained accommodation, with 6811 campus rooms available.

1.2 There are 10,575 student beds in private and university owned PBSA, whilst 50% of University of York returners in term time are in the private rented sector and 7.2% in PBSA.

1.3 In 2021/22 all PBSA provision in York was filled. With student growth forecasts at +2,318 by 2027, and only a further 776 PBSA beds in the pipeline, this will lead to a potential shortfall of between 1,000 and 1,500. With HMO expansion limited due to regulation changes, the supply of student accommodation could fall behind demand. The price sensitive issues related to the need to increase the supply of mid-price options and reduce the number of high-price options exacerbates a growing issue for future students at the University.

2.0 Major education reorganisation of delivery strategy at University of York

2.1 The education delivery strategy and organisation of the University of York will undergo a major reorganisation in that, from 2023/24, the academic year will move from three terms (Autumn, Spring and Summer) to two semesters. There are four reasons for this:

1) To balance out teaching and assessment throughout the year, rather than have assessments in one concentrated period
2) To create a common design so that there are more opportunities for interdisciplinary study
3) To help align the academic year with other institutions to allow for more foreign exchange and placement opportunities
4) An earlier end to the academic year allows more students to take up employment, placements and internships earlier than they would have been able to under the

current arrangements. Given the current cost of living crisis and the fact that the student loan for living costs has not kept pace with inflation, it is more important than ever that students use the summer vacation to earn or gain work experience to improve their chances of obtaining employment post education.

The University will also be able to deliver modules flexibly via short courses and CPD programmes to non-age 18-21 cohorts.

The process of modularisation and semesterisation will bring York into line with the majority of universities in the UK and abroad.

2.2 These changes fundamentally alter the way in which the need for student housing is assessed. The delivery of teaching of some modules partly on line and partly in person will result in some registered students being taught at the University for short periods. Delivery of CPD programmes will also require short term accommodation. It is essential to ensure that students can rent PBSA bed spaces on flexible contracts which match their period of study which may be from a week to 52 weeks depending on the mode of study. It is the University's view that the management of such bed spaces is a matter for the University – not the local authority.

3.0 Socio-Economic background of University of York students

3.1 The University makes an annual return to the Office for Students (POLAR 4) which looks at students' geographical location as an indicator of socio-economic background which in turn tends to be an indicator of how likely young people are to participate in Higher Education. In 2017/28 c.20% of Undergraduate Home students came from the lowest participation areas. This has improved so that in 2022/23 this figure is c.25%. It is of great importance to the University of York, that as a University for Public Good* these figures continue to improve. We have a very real concern that the high cost of housing will deter students from making an application.

* Guiding principle of the University of York Strategy 2020-2030

4.0 University Student Housing Costs

4.1 Table below shows the University's colleges accommodation and cost ranges.

College	Catering type	Bathroom type	Cost per week
Alcuin	Self-catered	Ensuite	£173

Anne Lister	Self-catered	Ensuite	£179 to £194
Constantine	Self-catered	Ensuite or Shared	£175 to £194
David Kato	Self-catered	Ensuite	£148 to £194
Derwent	Catered + Self-catered	Shared	£156 to £207
Goodricke	Self-catered	Ensuite or Shared	£161 to £194
Halifax	Self-catered	Ensuite or Shared	£99 to £188
James	Catered	Ensuite or Shared	£207 to £224
Langwith	Self-catered	Ensuite or Shared	£175 to £194
Vanburgh	Catered	Ensuite or Shared	£143 to £226
Wentworth	Self-catered	Ensuite	£173 to £208

4.2 The costs for University owned accommodation range from £99 to £224 per week, with the higher prices including catered accommodation. This compares with 2022/23 prices for PBSA housing from £104 to £275, excluding catered services. The HMO market, used predominantly by groups of 2nd and 3rd year students, has traditionally been lower priced, but in the context of rising costs and high demand for this accommodation, these prices are now competitive with on-campus accommodation. Average rent across all short-term lease arrangements in HMOs for first year students arranged by YSJU is £176 per week per bedroom, with the highest at £209 per week per bedroom.*

4.3 For students organising their own accommodation and continuing students in second and third years, there is more limited data, but this suggests that students are paying higher average rates of around £190 per week per bedroom.*

* Statistics taken from YSJU data

5.0 Support for students from University

5.1 University of York owned accommodation acts as a real attraction for prospective students, in particular undergraduate first year students, those with a disability, and international students. In the face of PBSA rent averaging a high cost of £177 per week, the University provides housing support for students who need it most. At a cost of £6m-£7m (2021/22 data) for accommodation bursaries and between £400k-500k in housing energy grants for off-campus students there is a very real affordability issue for the student body.

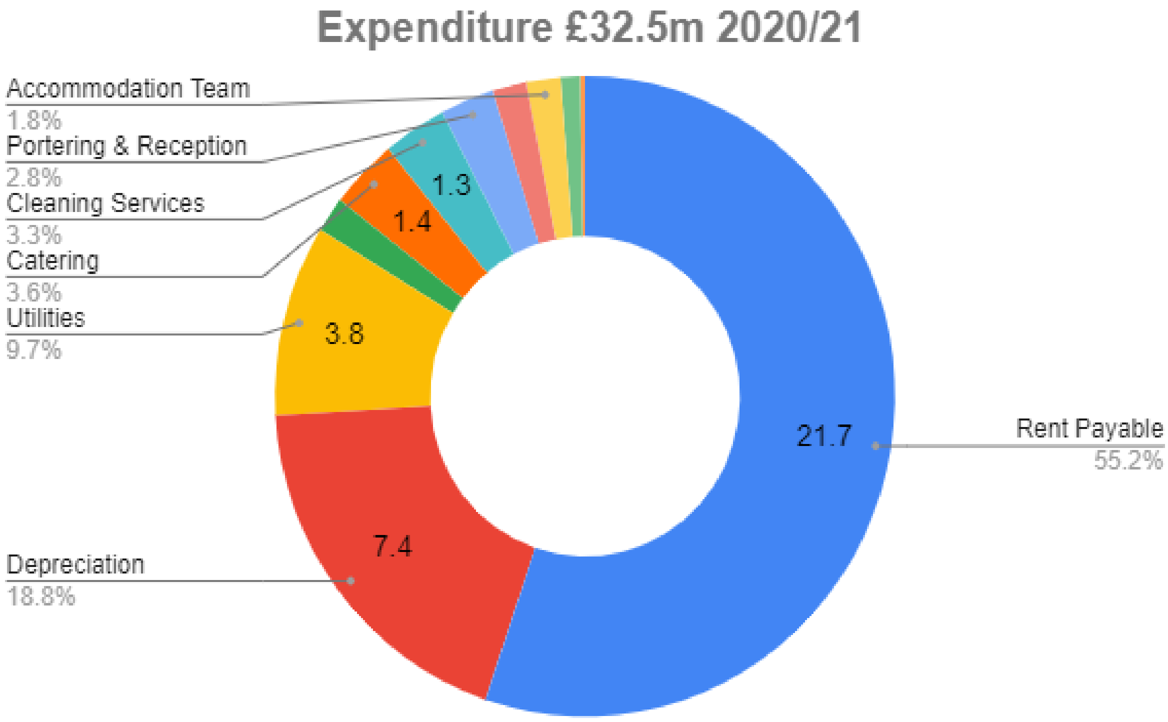
5.2 As the data below shows, the University is making a loss for on-campus accommodation in order to respond to these affordability problems, whilst the PBSA model is associated with profit driven rent prices. The proposed CIL charge of £150 per m^2 GIA levied on any new provision of on-campus accommodation, or a contribution of c.£7k/bed on new PBSA student housing will necessarily be added to student rents, making them less affordable and the education less inclusive.

5.3 **Income & Expenditure Related to Accommodation ***

	2020/21 £m
Income	33.8
Expenditure	39.3
Non Pay	27.9
Pay	4.0
Depreciation	7.4
Net cost	-5.5

Category	**Exp £m**
Rent Payable	21.7
Depreciation	7.4
Utilities	3.8
Maintenance	0.7
Catering	1.4
Cleaning Services	1.3
Portering & Reception	1.1
Security	0.7
Accommodation Team	0.7
IT Network costs	0.4
Other	0.1
Total Exp	**39.3**

* The figures above show the total income and expenditure related to accommodation for the financial year 2020/20



5.4 Data taken from the Student Cost of Living Report 2023 (commissioned by the Russell Group Students' Union) shows clearly the immense financial pressure the current cost of living crisis has already placed on students. On average, students are sitting below the poverty line for the UK. 1 in 5 are considering dropping out because they cannot afford to continue, and 1 in 4 are regularly going without food and necessities. With rates for PBSA accommodation in York for the upcoming 2023/24 year rising in some cases by £50-£60 more per week, compared to 2022/23, the cost of rent is only going to intensify the financial pressure on students. Crucially, this crisis will disproportionately affect those students who are most vulnerable to financial constraints (see below). This is completely at odds with our promise to be a University for Public Good, and our ability to support all students to achieve their full potential, regardless of role or background.

The top four groups who reported having less than £100 in savings:

- **Students whose parents have no qualifications** (34%, N = 144/423)
- **Students with a household income of less than £25,001/annum** (32%, N = 574/1801)
- **Students with caring responsibilities** (29%, N = 140/480)
- **International students** (29%, N = 501/1747)

Each of these groups were statistically more likely to have less than £100 in savings.

6.0 Securing the accommodation for university use

6.1 The current wording of local plan policy H7 alters the basis for establishing need for PBSA developments. To date, the test is to establish a shortfall in current provision compared with current demand.

6.2 The revised wording requires need to be projected ahead based on anticipated growth in student numbers at either or both universities. The universities are intended to commit to nomination agreements with developers at the planning application stage, three years ahead of any occupation date.

6.3 The University of York does not consider that the University should be compelled by planning policy to take all the risk of PBSA provision. The use of a long lease or nominations agreement to regulate the contractual arrangement would require the University to guarantee rent to the developer for the duration of the agreement, typically for all or the majority of the bed spaces. Thereby, this reduces the developer's risk to 'very low' or nil. The policy as drafted also assumes that there are a limited number of transactional arrangements for the delivery of PBSA, whereas in reality funders and developers enter into a wide range of contracts which can take into account the legal and financial position of the parties, land ownership etc. which the draft policy does not reflect.

6.4 The University will support a scheme for PBSA where:

a) it judges that the rent negotiated between the parties will be affordable for its students and this should remain a matter between the parties, and

b) the need for the development is evidenced by the Five-Year Student number forecast.

We therefore propose that the policy test should simply ask that any planning applications should be supported by one or more of the three HEIs accompanied by Five Year Student number forecast data.

7.0 Occupation of the accommodation

7.1 iv. Requires that the accommodation shall be occupied only by full-time students enrolled in courses of one academic year or more. This is considered to be too restrictive given our widened teaching routes and semesterisation. The occupation of the accommodation should include students registered at any York HEI university and pursuing studies. The policy should be sufficiently flexible to accommodate short course and CPD attendees plus placement students on schemes supported by the NHS for medicine and nursing. The University runs courses in these subjects related to the Hull York Medical School. The policy should also allow for the use of the accommodation for delegates registered for conferences held at any of the HEIs or one-off events associated with HEI activity. It is likely that these attendees would be accommodated at times outside when undergraduates would be in residence.

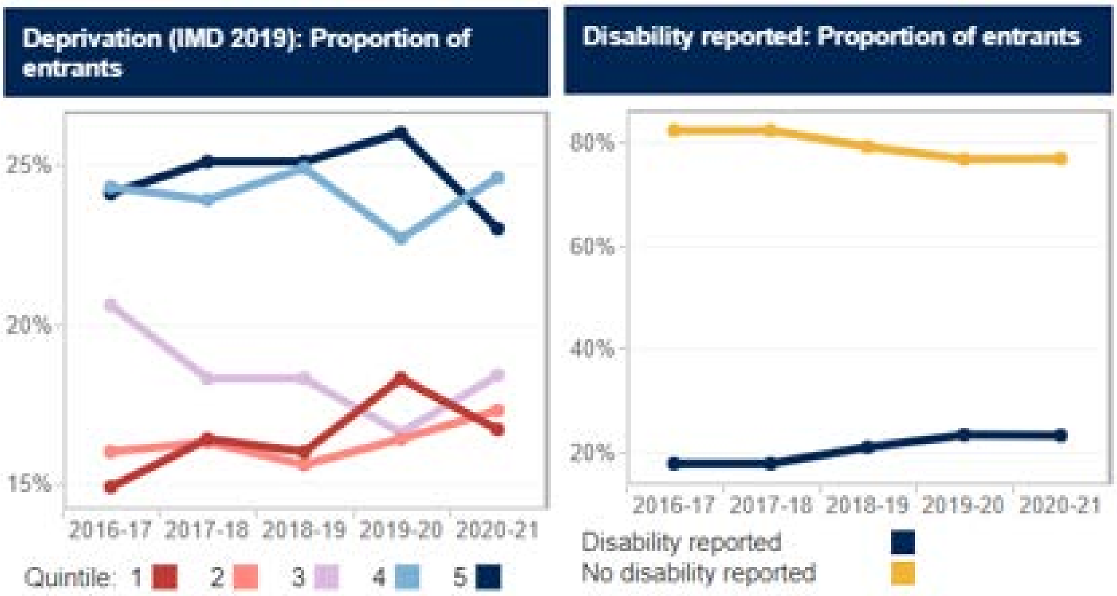
York St John University
Comments on the University's Student Housing Affordability Regime in relation to the Emerging York Local Plan Modifications **22 March 2023**

1. Overview

As of March 2023 our student population in York is 7440. Our student body is comprised of a higher proportion of students from more deprived backgrounds than the average higher education institution (based on HEFCE data 2021 - see below), and a similarly higher proportion of students declaring a disability, which is often associated with more exposure to difficulties with increasing cost of living.

Approximately 31% of our students are accommodated in our own accommodation and PBSA accommodation under nomination agreements or leases. These are primarily first year students, as is the norm for all higher education institutions. The remaining 69% are either occupying housing in the private rented sector, with PBSA providers or are commuting students.

For the forthcoming year, 100% of first year students in PBSA not owned or managed by the University (c. 800 students) and around 70% of first year students in HMOs (c. 300 students) leased by the University are currently receiving financial support in the form of subsidised rent. This is because current market rates are deemed too high to sustain application rates. The average rent across private PBSA providers in York is currently 61% higher than York St John University's own accommodation. This is in addition to more general financial support offered to students experiencing hardship, and support for students in private accommodation. The total cost of support across all of these areas is summarised below.



HEFCE Student access data 2021, York St John University

Any attempt to support the viability and growth of the University must address the fundamental substantive concerns that we have as a higher education institution regarding the total omission within the draft local plan of *affordable student housing* from the consideration of wider affordable housing policy. This is despite students making up a substantial portion of York's population, and by extension, of the Council's constituents. These people are owed a duty of care, equal treatment and consideration in relation to wider housing policy, especially since the majority of students are workers themselves across the city, or in key placement roles such as nurses, paramedics, lawyers, scientists, etc.

In simple terms – *affordable student housing* must be considered to be a key part of affordable housing policy in York, and policy must be strongly evidence based.

Further, there is little appreciation of the potentially severe detrimental impact of these draft policies on the basic operational and financial viability of the University given the national context of static tuition fees, or the consequential detrimental impact upon the city's economy.

York has suffered from significant profiteering across the rental market over the past two years, and as referenced throughout this document, we are now spending a considerable sum of money performing a public service by assisting with housing costs. This is simply due to a lack of effective policy bringing forward sufficient accommodation and specifically a lack of effective affordable housing policy. The situation is being made even more difficult due to related policies concerning HMO licensing and license application criteria, which are also increasing costs across the private rented sector and seem not to have been considered with regard to any ambition to encourage more housing development to meet the clear need.

2. Student Profile

We feel a particular ethical obligation to articulate the detrimental impact of these policies at York St John because the impact will be felt more acutely by our students. This is for the following reasons:

- Our population of mature students has increased by 113% in the past five years;
- Our population of students reporting a disability has increased by 32% in the past five years, was already high, and is significantly higher (at 23.3%) overall than the national average (17%);
- Around 20% of our students are the first in their family to go to university, a metric traditionally associated with working class families, and at a significantly higher rate than the national average;
- Our population of students from disadvantaged backgrounds is relatively high and growing. Student numbers from quintile 1 of the Index of Multiple Deprivation (the most deprived areas) have increased by 26% over the past five years;
- Our population of care leavers has increased by 113% over the past five years.

Taken as a whole, it is clear that there is significant vulnerability to economic hardship within our student body. There is simply no way that these students can afford the current market rates for student accommodation in York, since what has been permitted over the past decade is dominated by very high-cost accommodation at the luxury end of the market. We believe that there should be a specific suite of policy measures aimed to support limiting average student rent in York to no more than £165 per week (2023 prices) for a standard bedroom on a 44-week contract term. Our modelling shows that prospective student applications drop off sharply above this cost, many students struggle to obtain guarantors, and it is well beyond the means for the average student, forcing many into working jobs at a much higher number of hours than would have been the case in the past and at too high a rate to effectively study. We have also seen housing costs increase as a factor in mental health referrals and in students' reasons for abandoning their studies altogether after their first year.

3. Student hardship and cost of living impacts

At York St John University we have seen a 47% increase in student hardship applications over the past 3 years to well over 500 student applications, with the average financial value of hardship support deemed necessary per student increasing by 63% in the same period.

The total budget now allocated to student financial support is in excess of £2.1 million in 2023, of which almost 75% relates directly to housing cost support. This has increased tenfold over the past five years and is now a substantial proportion of overall turnover. It is simply not sustainable to maintain this over the long term. We see the proposed planning policies discussed here as severely exacerbating this problem rather than resolving it. The only long-term solution which simultaneously meets the Council's objective of supporting the University's growth and sustainability is the explicit encouragement of a substantial increase in the overall number of affordable housing units in York, specifically PBSA student housing and in the private rented sector.

We have a substantial body of anecdotal evidence reporting a significant increase in the average number of hours that students are working, with many working almost full-time hours and a corresponding impact upon their study.

Around 80% of students applying through the UCAS clearing process (after our own substantially lower cost accommodation has already been allocated) cite high accommodation costs as a factor discouraging them from applying, with the majority not taking up an offer of a place following discussions about available accommodation options and a significant number specifically citing high accommodation costs.

The cost of accommodation in the city is also compiled in various University surveys and league tables, and is an important factor which prospective students consider when deciding where to apply.

Unfortunately, we have also seen a significant recent increase in students dropping out after their first year. This has resulted in a £3.7 million loss of income projected from 2022 -2024, and based on interviews with and data collected from these students, we believe that up to 60% of these students choosing not to continue their studies are doing so primarily on the basis of cost of living pressures, of which accommodation costs are by far the most significant. This view is supported by the fact that we have seen over 100% increase in students applying to stay in University owned accommodation in their second year.

4. Proposed policy H7 and securing additional student housing

York St John University anticipates that over the next three-four years to the 2026 academic year our total number of York-based students will increase to over 10,000 but could easily increase beyond this depending upon national higher education policy. This represents a 52% increase from 2021/22 and is driven by national policy and increasing operating costs forcing growth and diversification in order to remain financially viable.

We anticipate that total demand for student accommodation associated with this change will increase by 46% over the same period, to at least 7,629 bedrooms, and as part of this the total demand for private sector accommodation will increase proportionately to at least 5178 bedrooms, a 53% increase.

We cannot provide this accommodation on campus, because our campus is already at or close to its development limit and is constrained in a number of ways (listed buildings, conservation area, city centre location surrounded by residential areas).

Only one location in York has been designated suitable for development with respect to student accommodation, but discussions have immediately highlighted the severely constraining effect of a very conservative attitude to appropriate massing (a problem for economic development in the city as a whole) with the effect that this site is deemed by CYC only capable of supplying around 400 bedrooms. This also limits the construction efficiency and increases build costs per bedroom.

There is limited scope for significant development of further PBSA sites in York. Current development sites have still not been effectively modelled in relation to University growth, or the impact of these proposed policies on viability or affordability, both in terms of initial construction affordability or consequential rent affordability.

We currently enter into a variety of short-term arrangements with private sector accommodation providers, including nominations agreements of varying terms up to 5 years, and long-term leases of varying terms up to 25 years. However, a nomination agreement is deemed a short-term option for flexibly managing demand and supply problems. It is most certainly not a suitable policy prescription to ensure affordability, since at the end of the nomination agreement, the provider can simply increase rental rates up to or above market rates, which have been spiralling out of control due to lack of supply across the entire housing market in the city. The only appropriate solution to guarantee affordability is based on either a long-term lease requirement with associated permanent planning conditions or permanently binding lease commitments in the form of a section 106 agreement or similar, with specific prescribed reductions in rent against market rates. As above, we have not been consulted on the viability of these proposals but will be very happy to assist in creating a workable and effective policy framework.

In relation to the occupation of new sites, the proposed policy (and recent planning determinations) is too prescriptive in relation to use by non-enrolled students. There needs to be consideration given to students who bring family members with them, whether from overseas, or because they are parent or single parents. There also needs to be flexibility to allow for educational conferences, summer schools, etc, as well as an understanding of the positive effect that allowing short periods of limited commercial use have the potential to ensure that we (and private PBSA providers) can maximise use outside scheduled teaching semesters. Without this provision, there is simply no financial viability for these developments outside scheduled teaching time (currently only half of the year), with a consequentially detrimental effect on affordability for students, which as above, has not been impact-modelled. We can advise in detail on the relative effects of different policy measures in this regard.

5. Community Infrastructure Levy or equivalent contributions

The proposed CIL or financial contribution towards affordable housing on new student accommodation is extremely concerning to us. It fails to correlate with the aim of the providing affordable student housing. By increasing the cost of student housing, it will logically prevent that housing from being affordable itself.

York St John University does not have the capital resources or land to build extensive new accommodation developments beyond the allocated site mentioned above. Therefore, if this policy is agreed, it will simply ensure that new student accommodation is not economically viable in York, which is contrary to the Council's stated aims of supporting and encouraging the University's growth and prosperity.

Even cursory impact modelling and a basic evidence-based approach should identify that this proposed measure, coupled with recent long term increases in construction costs will severely impact the viability of new development. In the context of supporting the University's growth and success, and acting to ensure affordable student housing, it does not make any sense at all to impose additional costs on already expensive new construction. Our own modelling based on current schemes indicates that the proposed levy would increase development costs by up to 7-8%. Coupled with higher interest rates to service debt, this would imply an equivalent increase in rents of at least this amount in order to deliver the required yield for private providers. This is simply not affordable.

We have laid out above the existing severe cost of living effects being seen amongst our student body. Any measure that imposes additional development costs on new PBSA in York will exacerbate that problem, and will be directly contradictory to the proposed approach being suggested in policy H7 to make student housing affordable.

We ask that these concerns are taken into account to ensure that planning policy is genuinely supportive of the University's needs as a prime employer and integral part of the city's economy.

Nick Coakley BSc, MSc, MSc, MIET, FCABE, C. Build E
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(ref:Local plan NC revised policy H7 comments YSJ.v5)

ASKHAM BRYAN COLLEGE

Askham Bryan College Evidence 27 March 2023

1. Student Profile

In the current year the college has, 3000 students enrolled from entry level provision to honours degrees. The College has substantial residential accommodation for approx. 10% of its student population, with 337 bedrooms across twelve buildings with students drawn from across the UK in residence during the academic year.

Further Education (FE) students:

- 71% of FE students are 16-18yrs
- 44% of FE students have declared learning difficulties and/or disabilities (LLDD)
- 4% of FE students are from the lowest two decile IMD
- 39% students without an English AND/OR maths grade 4 (C) or above
- 2% students are 'looked after children'

A breakdown of Higher Education (HE) students socio-economic background for current enrolments is shown in the tables below. This collects the socio-economic background of students aged 21 and over at the start of their course, or for students under 21 the socio-economic background of their parent, step-parent or guardian who earns the most. It is based on occupation, and if the parent or guardian is retired or unemployed, this is based on their most recent occupation. The College currently has 433 HE students enrolled with 64 (15%) in student residential accommodation. 3.7% of the Colleges current HE students are care leavers.

Socio-economic Class	Percentage
1 Higher managerial & professional occupations	4.27%
2 Lower managerial & professional occupations	6.40%
3 Intermediate occupations	3.79%
4 Small employers & own account workers	4.50%
5 Lower supervisory & technical occupations	3.79%
6 Routine occupations	4.98%
7 Never worked & long-term unemployed	3.32%
9 Not classified (students, occupations not stated or inadequately described or other reasons)	68.96%

POLAR Quintle relates to postcode and levels of participation in HE, 1-2 lowest level	Percentage
1 Lowest rate of participation	22.30%
2	26.38%
3	15.35%
4	17.51%

5 Highest rate in participation	18.47%

IMD Index of Multiple Deprivation	**Percentage**
1 Highest level of deprivation	8.82%
2	12.85%
3	7.56%
4	8.31%
5	8.31%
6	12.59%
7	11.59%
8	9.82%
9	11.34%
10	8.82%

Ethnicity	**Percentage**
Any Other White background	3.08%
Chinese	0.24%
English / Welsh / Scottish / Northern Irish / British	94.55%
Indian	0.24%
Irish	0.47%
Pakistani	0.24%
White and Asian	0.95%
White and Black Caribbean	0.24%

Notes

The participation of local areas (POLAR) classification groups areas across the UK based on the proportion of young people who participate in higher education.

It looks at how likely young people are to participate in higher education across the UK and shows how this varies by area.

POLAR classifies local areas into five groups - or quintiles - based on the proportion of young people who enter higher education aged 18 or 19 years old.

Quintile one shows the lowest rate of participation. Quintile five shows the highest rate of participation, i.e. the College is recruiting 48.6% of its student HE population from the 2 most disadvantaged postcode areas

ASKHAM BRYAN COLLEGE

2. Student Hardship

The total budget now allocated to student financial support is in excess of £0.5 million in 2023, of which almost 35% relates directly to residential bursary support.

FE Students can apply for a residential bursary (funding received by the College from the Department of Education) the award of this bursary is means tested. In the current year awards have been given to 57 of the 291 (19%) students that reside in our onsite student residential accommodation. This bursary is only available to FE residential students (usually 16-18 years) and not HE students (usually +18 years).

The maximum amount of an FE residential bursary that can be awarded is £3,458, so based on the cheapest residential package (standard, self-catering) the student would still be liable to pay £639 and the most expensive (ensuite, self-catering) they would still pay £1,336. Based on a 34-week academic year this means the student qualifying to receive an award would be liable for accommodation charges amounting to between £19 and £40 a week dependent on the accommodation.

In addition to the cost of the accommodation a student would be required to pay a £300 security deposit to secure their booking, however this would be refundable assuming no damage and clear account when they return their keys at the end of the academic year.

3. Student Accommodation Rates

The current year's student accommodation costs are listed below. The College has to provide catering for students under the age of 18, however excluding catering our most expensive package (ensuite) amounts to £4,794, based on a 34-week academic year this amounts to £141 a week, a standard room with shared facilities amounts to £120.50 a week.

The College's cheapest accommodation is self-catered with shared bathroom facilities, this is currently full but we do not have a waiting list. The accommodation which sells out first is self-catered ensuite and those who don't get put in one of those rooms tend to end up in the self-catered shared bathroom rooms. Our ensuite self-catered rooms sold within 30mins but the standard self-catered takes approx. 1 week to fill.

Under 18s Annual Accommodation Rates

Type of Accommodation	Annual Fee (Option A Catering Package)	Annual Fee (Option B Catering Package)
Ensuite Halls	£6,069	£6,579
Standard Halls	£5,372	£5,882

Over 18s Annual Accommodation Rates

Type of Accommodation	Annual Fee (Option A Catering Package)	Annual Fee (Option B Catering Package)	Annual with Self Catering: Over 18's only
Ensuite Halls	£6,069	£6,579	£4,794
Standard Halls	£5,372	£5,882	N/A
Standard Halls – Main Building	£5,372	£5,882	£4,097

* Option A provides a food allowance of £37.50
* Option B provides a food allowance of £52.50.
* At the point of applying for accommodation you must pay a refundable Deposit of £300 in addition to the Accommodation Fee.

The College will always prioritise looked- after students and they are also guaranteed a room for the whole of their course duration. All students with disabilities are offered our Disabled Access rooms over an able-bodied student and then all other students will be discussed with the HE team and the Student Service teams due to risk assessments and level of care required.

The College's Finance and HE Teams work together to offer separate payment plans that run in conjunction with loan dates to assist students in hardship, i.e. some students will not make an initial payment when they first move in as per our contract but will make this payment out of their student finance from the Student Loan Company.

4. Community Infrastructure Levy

The proposed CIL on new student accommodation is of real concern to the College.

The College anticipates a significant rise in student numbers over the next ten years, and its existing student accommodation is hugely oversubscribed. With 1,847 students in 2022/2023 forecasts for 2025/26 estimate a rise of 6-12% in student numbers resulting in 2,000-2,300 students. The waiting list for student accommodation is about 30-40 students annually (10% above 340 accommodation capacity), with the likely figure higher as many students done not join the list once capacity is full. As a result, hundreds of students travel in daily from a wide catchment to the College.

The College has 32 rooms currently within Portakabins which have temporary planning permission until 31st March 2026; and 50 other rooms in 5 separate blocks which date back to 1960s all of which require replacement. The GIA of these current buildings amounts to 1,700sqm. If a rate of £150sqm was levied on any new provision of replacement student accommodation, and assuming 3,000sqm of accommodation was required to accommodate the approximate increase in student numbers projected (3400 students to 4,200 students by 2030, of which 10% would live in on-campus accommodation), this would result in CIL contributions of £450,000. In the context of the low-income profile of students, it would not be possible to pass this financial contribution onto the College's students as it would seriously question affordability to parents and carers of predominantly students under the age of 18. If rates of accommodation were increased, it would result in the College's costs being significantly higher than other competing land-based colleges where students could decide to undertake their studies on similar programmes instead of studying at Askham Bryan in York.

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ASKHAM BRYAN COLLEGE
Learning is in our Nature.

CBRE

City of York CIL Draft Charging Schedule Consultation

Technical representation prepared by CBRE UK Ltd jointly on behalf of the following:

- University of York
- York St John University
- Askham Bryan College

March 2023

Contents

Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by a consortium of higher and further education institutions ('the consortium') to prepare a formal representation document setting out a technical response to the City of York Council ('CYC') Community Infrastructure Levy ('CIL') Draft Charging Schedule ('DCS') consultation 2023 ('the consultation').

2. CBRE's technical representations focus upon the evidence base underpinning the CYC CIL DCS – specifically the City of York CIL Viability Study Final Report ('CIL Viability Study') produced by Porter Planning Economics ('PPE') and dated December 2022.

3. An overarching representation has been prepared by York-based town planning consultancy O'Neill Associates.

The Consortium

4. The consortium consists of the following leading higher education institutions ('HEI's') and a further education institution ('FEI'), all based within York:

   - University of York
   - York St John University
   - Askham Bryan College

The Consultation

5. CYC published the following documents on 13th February 2023:

   - CIL Statement of Representations Procedure ('SORP')
   - CIL Consultation Information Booklet
   - CIL Draft Charging Schedule ('CIL DCS')
   - CIL Viability Study
   - CIL Infrastructure Funding Gap
   - CIL Associated Mapping (for information only)

6. The consultation ran to 27 March 2023.

7. The SORP confirms BCC's intention to submit the CIL DCS for independent examination following the close of the CIL DCS consultation.

The Consortium's Stance

8. The consortium has fundamental concerns regarding CYC's proposal to introduce CIL charging on purpose built student housing (usually referred to as purpose built student accommodation or 'PBSA') development within the CIL DCS.

9. It is the consortium's firm view that the introduction of the proposed CIL rates will undermine the viability of new development in an environment where recent long-term construction cost inflation, softened funding investment yields, and increased debt servicing costs have placed increasing pressures on development significantly since mid-2022. This is exacerbated by the limited availability of suitable sites in what represents a highly constrained urban context.

10. In parallel, the consortium reports that the student body in York is suffering from the existing severe cost of living pressures. Each member of the consortium has reported that hardship grant application have increased substantially in recent years and the value of hardship support also rising, with housing costs representing the majority of funds required.

11. The only way to absorb additional costs arising from the proposed CIL charges would be to commensurately and significantly increase rents, which would undermine the consortium's objectives of social inclusion by intensifying the affordability challenges already faced. This approach would be wholly contrary to the CYC's policy ambitions to increase the supply of affordable living accommodation in York.

12. In light of above the consortium does not accept the validity and reliability of the published viability evidence base upon which the proposed PBSA charging rates within the CIL DCS relies, and hence the legal compliance of the published CIL DCS with the relevant legislation and guidance.

13. On this basis, the consortium members cannot agree with CYC 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 unavoidably lead to the rejection of the Charging Schedule in accordance with Section 212A(2) of the 2008 Act.

14. Should CYC determine to submit the CIL DCS for examination, in its current form and without rectifying the issues identified in this representation and O'Neill Associates overarching representation, the consortium will be left with no choice but to seek that the Examiner rejects the Charging Schedule via the examination process.

Request to be Heard and Notification Requests

15. It is stated on the consultation page of CYC's 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 CYC's approval of the Charging Schedule.

16. This constitutes the consortium's formal request to be heard at the examination of the CIL DCS, either as a consortium or as independent stakeholder organisation, and to be notified by CYC of the events listed in paragraph 12 above. This notification should be provided to both O'Neill Associates and CBRE, as instructed joint agents.

Matters of Representation

Purpose

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

Significance of Proposed CIL DCS Rates

18. The CIL DCS proposes a significant increase in costs via the introduction of CIL charging on multiple uses for the first time.

19. Notably, the CIL DCS introduces the following new zonal charges:

Development type	CIL rate per sqm
Residential dwellings within the City of York	£200
Residential dwellings within the City of York Local Plan strategic sites ST7, ST8, ST9, ST14 and ST15	£0
Residential dwellings within the remaining City of York Local Plan strategic sites	£100
Sheltered / Retirement accommodation	£100
Extra care accommodation on Brownfield sites	£100
Extra care accommodation on Greenfield sites	£0
Purpose Built Student Housing without an affordable housing contribution	£150
Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution	£50
Convenience[1] retail with up to 450 sqm gross internal area	£100
Comparison[2] retail built outside the City Centre boundary	£100
Comparison retail built inside of the City Centre boundary	£0
All other development	£0

20. These are not incremental changes, but rather represent a fundamental shift to introduce substantial rates of CIL charging across multiple uses both city-wide and on a zonal basis.

21. It is notable that the rates proposed are amongst the highest, if not the highest, across the entirety of Yorkshire and the Humber, even when allowing for indexation since adoption in other Charging Authorities.

CBRE has provided a full schedule of proposed and adopted rates across the region as a comparison within **Enclosure 1**.[1]

22. As a result, such proposals by CYC must necessitate comprehensive, robust, and up-to-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).

Illogical Timing

23. The UK property market is experiencing a highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally over 2022 and which is expected to prevail over the course of 2023. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Development and investment across a wide range of sectors are facing headwinds, which commenced in mid-2022 and continue to prevail during 2023.

24. 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. Throughout 2023, CBRE expect unemployment to rise from its current historically low level. In tandem, job vacancies will decrease. Wage growth will not be able to keep up with inflation until late 2023, eroding consumer purchasing power. We expect a moderate recession to occur in 2023, with GDP falling by 0.9%.

    b. Inflation has been rising relentlessly over the past 18 months and is at its highest for 40 years. Inflation has been driven by a post-COVID surge in demand, which could not be met due to supply bottlenecks. Russia's war in Ukraine has exacerbated supply shortages, pushing energy, food, and other commodity prices even higher. Policy choices, such as China's zero-COVID policy, are slowing down the recovery of supply chains, and raising the costs of imported durable goods. In the UK, inflation has been exacerbated by a weak pound, which has made imports more expensive to the UK consumer.

    c. Increased global supply chain disruption has and will continue to put further upward pressure on energy prices, food prices and construction materials. Significant uncertainty persists around the future path of inflation. Inflation remains stubbornly high in early 2023, with the Consumer Prices Index (CPI) rising by 10.4% in the 12 months to February 2023, up from 10.1% in January. CBRE's base case is that CPI inflation will have peaked in Q4 2022 and fall back in the second half of 2023. Implicit in this forecast is the end of the Ukraine conflict by year end with energy - and non-energy commodity prices falling from their current highs.

    d. Monetary tightening is well underway over fears of second-round effects from wage and price-setting. During 2023, the Bank of England will continue to rise interest rates, which CBRE forecast to peak at around 4.5% and push borrowing costs to the highest levels prior to the financial crisis in

[1] Note: this information was obtained from Planning Resource and is understood to have been correct as at August 2022. The rates presented are not indexed, but represent those rates either proposed (latest) or at the date of adoption of relevant Charging Schedules.

2008. As inflation begins to cool, rates will begin to decrease, declining gradually to a 'new normal' of around 2% from 2026 onwards.

e. Faced with spiraling prices and higher interest rates on loans, businesses and consumers are limiting spending. Consumer confidence has been hit, and retail sales will continue to decline until inflation moderates and consumers restore their purchasing power. Businesses will have to cut costs to preserve margins in a high-inflation environment. This will lead to some job losses and higher unemployment in the first half of 2023.

f. The 10-year gilt yield has risen by almost 200bps since the beginning of 2022 and financial conditions are materially tighter than in Q2 2022. The expectation of future short-term interest rate hikes will continue to push upward on long-term market interest rates until the base rate starts to move down.

g. Inflation and rising interest rates have resulted in an increase in property yields. This ongoing yield shift, which commenced from Q3 2022 has hit values and returns for investors. As the cost of capital, closely related to the interest rates of central banks and therefore to inflation, have risen, valuations have been negatively impacted.

25. Specifically considering the PBSA sector, CBRE's baseline forecast for 2023 is as follows:

a. Overall, the sector continues to be undersupplied but this is highly nuanced, and an understanding of affordability is key. An in-depth understanding of the submarket dynamics is critical.

b. Investment yields have softened in H2 2022 and high inflation and rising interest rates will continue to impact the investment and funding market over 2023 and into 2024, until inflation abates and central banks pivot on interest rates.

c. Overall, the development of new PBSA is slowing due to a combination of factors, and this will carry forward throughout 2023. Specifically, the drivers are as follows:

i. Rising build costs present viability challenges

ii. The pace of the planning system remains a significant barrier to delivery

iii. Rising operational costs will also continue to hinder new development given the negative impact on net rental income.

iv. Development financing is also increasingly expensive and is increasingly difficult to obtain.

26. CBRE questions the logic and rationale, and efficiency in use of public funds, for introducing a CIL regime at this juncture, given the wider challenges facing development and uncertainty in both the macro-economy and property market.

27. CYC'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 city for PBSA development.

Outdated Evidence

28. The published available evidence to inform the CIL DCS is the CIL Viability Study produced by PPE and dated December 2022.

29. CBRE has reviewed the CIL Viability Study in detail. It is apparent that the input assumptions for PBSA scheme typologies, which are subsequently utilised by PPE in undertaking the viability modelling, analysis, conclusions and recommendations rely substantially upon evidence from Q1-2 2022.

30. As set out above, and well-documented, have been significant macro-economic headwinds and property market adjustment issues over the period since, as well as substantive ongoing construction cost inflation, which are material considerations that any robust viability evidence base must account for.

31. In addition, the Government is conducting a staged implementation of the Building Safety Act 2022, and has stated that it expects student accommodation to be subject to the regulatory regime under Part Three, which will have implications for the design and construction of new developments.

32. The Government has also recently consulted upon amendments to Approved Document B, which proposes that all new buildings of 30m (circa 10 storeys) or above will require a second separated staircase[2]. The Greater London Authority ('GLA') has pre-empted the Government's conclusions by mandating this requirement for new development in Greater London with immediate effect.

33. The Government is currently considering responses following closure of the consultation on 17 March 2023, but it is widely anticipated that student accommodation will be required to conform to the amendments, which is prompting developers and investors to factor second staircases into plans for new development going forward in order that they can meet regulations, and be insurable, investable and deliverable. Specifically, Government states:

"58. Recognising that many schemes are in development, and this change would represent a significant change, we are proposing a very short transition period before implementing the changes.

59. The transition period will allow time for schemes to be completed but should not allow the opportunity for developments to get off the ground ahead of the new requirements coming into effect.

60. We would encourage all developments to prepare for this change now."

34. Based on the impact assessment conducted, the Government has publicly acknowledged that the implications of additional construction costs, and loss of build efficiency, will impact negatively on the financial viability of development and, as a result, is likely to reduce the propensity of higher density schemes to deliver affordable housing as a consequence:

"65. The costs of a second staircase will also impact the viability of high rise buildings, this is likely to reduce the amount of affordable housing that can be provided by developers."

35. The impact will be that gross to net build efficiency is reduced, meaning lower net lettable floorspace against a higher or equivalent gross internal area (GIA).

36. It does not appear that the CIL Viability Study has accounted for the this or addressed the implications.

37. CBRE has provided further details upon this relating to PBSA use within the 'Technical Deficiencies' sub-section of this representation.

[2] https://www.gov.uk/government/consultations/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings

Technical Deficiencies

38. There are a range of detailed technical issues identified, which render the CIL Viability Study as an unsound basis for setting the proposed CIL rates for purpose built student housing, and which the consortium advocate will require rectification prior to CYC proceeding with the CIL DCS as presently published:

a. **Rents, Yields and Capital Values for PBSA Typologies:**

i. The CIL Viability Study tests 5no. PBSA typologies ranging from 25 beds to 600 beds. An average gross rental income is applied of £177/week over 47 weeks (annual) based on the 2022-23 academic year. This is drawn from a cross-section of PBSA schemes across the city, which is provided in Appendix C of the document.

ii. CBRE notes that the adoption of an 'average' gross rental rate of £177/week is represents a cross-section of both private sector operator PBSA schemes and HEI operated student accommodation.

iii. However, the proposed CIL charging rate of £150/m^2 applies to "*Purpose Built Student Housing without an affordable housing contribution*". The proposed modifications to Policy H7: Off Campus Purpose Built Student House within the CYC Local Plan confirms the following:

"Contributions towards affordable housing provision from new student accommodation will not be sought where the student accommodation site which at the date of adoption of the Plan is owned by a university and which will continue to be owned by a university to meet the accommodation needs of its students"

iv. On this basis, on campus PBSA development is excluded from contributions towards affordable housing under Policy H7, but will fall within the CIL charging rate referenced above.

v. CBRE therefore considers the appropriate rental rates to be used in viability testing for on-campus PBSA to reflect the rents charged by the institutions themselves. CBRE has collated this information, which is provided within **Enclosure 2**. It is summarized in **Table 1.**

Table 1: Comparison Analysis: HE / FE Institutions – Average Rental Analysis

HE / FE Institution	£/Annum (Av.)	Weeks (Av.)	£/Week (Av.)
University of York	7,456	42	176
York St John	5,876	43	137
Askham Bryan	4,446	32	138
Average (All)	***5,926***	***39***	***151***
Average (HE only)	***6,666***	***43***	***156***

vi. This demonstrates that the appropriate rates for applying to the University of York and York St John University within viability typology modelling should be £156/week (not £177/week), with this reducing further to £151/week, if also including the rents charged at Askham Bryan college[3].

vii. CBRE noes not disagree with the CIL Viability Study's usage of the average gross rental income of £177/week to be applied to private sector (non-campus) development typologies.

viii. OPEX is deducted at 30% of gross annual rent to generate a net rental income, which is capitalized at an investment yield of 5.0%. This is stated as generating a capital value of £112,300 per room.

ix. The CIL Viability Study cites, at para 3.75 that the above capital value is a "*cautious sales value for the sole purpose of this planning viability assessment*".

x. CBRE notes that this observation is based on evidence obtained from a Cushman & Wakefield report (non-York specific) drawing on data from H1 2022. It therefore does not represent current market conditions.

xi. Analysing York specifically, there are relatively few recent transactions for which information is available. These are as follows and demonstrate a tone of circa 5.5%-6.5% NIY and capital value of circa £90,000-£100,000 per bed:

1. 62 Layerthorpe: comprising 98 beds transacted in 2019 on a forward fund / commit to iQ Student Accommodation for a total capital value of £92,000 per bed.

2. Haxby Road City Residential: comprising 124 beds transacted in 2018 on a stabilized investment basis at a NIY of 6.5%, reflecting £60,000 per bed.

3. Foss Studios: comprising 220 beds transacted in 2017 on a stabilized investment basis at a NIY of 5.7%, reflecting £106,000 per bed.

xii. The above capital values would suggest that the sum of £112,300 per room adopted in the CIL Viability Study actually exceeds transactional evidence available for York in recent years.

xiii. CBRE's research places York as 21st in the league of the UK's cities with the highest full-time student populations in 2021/22, with circa 27,000 full-time students. This is relatively low compared to the top five regional cities (Birmingham, Glasgow, Manchester, Nottingham, Leeds), which collectively accounted for 374,000 full time students.

[3] Note: all recorded rents are for self-catered facilities.

xiv. On the basis of the above, CBRE ranks York as a Prime Regional location for PBSA and understand that other agents such as JLL and Knight Frank regard the city on an equivalent basis.

xv. As stated earlier in this document, investment yields have softened since Q3 2022 due to wider macro-economic conditions, and continue to trend weaker in a high interest environment. The latest available investment yield sheets now record Prime Regional PBSA yields as follows:

1. JLL Monthly Yield Sheet: PBSA Prime Regional at 5.25% in January 2023 (softening from 5.0% in Q3-4 2022[4].
2. Knight Frank Prime Yield Guide – March 2023: PBSA Prime Regional at 5.0% - 5.25% (softening from 4.75%-5% in Q3 2022)[5].
3. CBRE UK Living Sectors Investment Yields – March 2023: PBSA Prime Regional at 5.0% and trending weaker (softening from 4.75% in Q3 2022)[6].

xvi. In summary, three respected agents all report PBSA Prime Regional yields softening to 5.0% - 5.25% at present day. Importantly, these are not development funding yields, but are stabilized investment yields.

xvii. Institutional forward funding has been one of the main delivery routes for financing the development of PBSA schemes in York and elsewhere across the regions, where brought forward by the private sector (i.e. non-University). CBRE's market intelligence is that funding yields are transacting at a discount of circa 25bps in comparison to stabilized investment yields. As a result, if the rates above are adjusted for development funding, this would see yields at 5.25% - 5.5%.

b. **Construction costs**:

i. The construction costs adopted are set out in Table 5.3 on p.49 are cited as being drawn from RICS BCIS. The source data is referenced as being provided in Appendix D. The RICS BCIS cost is cited as £2,112/m^2 (£196/ft^2) and base-dated at Q3 (i.e. Jul.-Sept.) 2022.

ii. Given that circa 6 months has passed since the construction costs were base dated, CBRE has reviewed the RICS BCIS data as published at 11 March 2023. On an equivalent basis the RICS BCIS median cost now stands at £2,166/m^2 (£201/ft^2), which is an increase of 2.6%. The data is provided within **Enclosure 4**.

iii. CBRE comment that the RICS BCIS costs of £2,166/m^2 (£201/ft^2) are extremely low in the context of PBSA developments being brought forward for delivery in regional cities in the current market, and would highlight that RICS BCIS is a significantly lagging indicator due to

[4] Note: this is provided within **Enclosure 3**.
[5] Note: this is provided within **Enclosure 3**.
[6] Note: this is provided within **Enclosure 3**.

the time taken for tender data be provided and reporting updated. Hence, in an inflationary environment over 2022 and 2023, it has consistently underestimated construction costs being generated in real-time. Moreover, as mentioned prior, RICS BCIS will not yet account for changes to fire safety guidance (Approved Document Part B).

iv. CBRE notes that the CIL Viability Study also cites in para. 5.10 that additional allowance of 15% of build costs for external site works such as utilities, car parking and landscaping is provided.

v. However, reviewing the example 100-bed typology appraisal in Appendix A confirms that there is an error, whereby the viability appraisals only account for a 10% external works cost, which means that there is an omission in the viability testing of this typology of at least £280,262.50. This is greater than the entirety of the CIL headroom of £223,666, which would significantly alter the conclusions and recommendations of the CIL Viability Study. In essence, if corrected, it would eradicate any headroom at all for CIL on Typology 10a or 10b alongside the proposed Policy 10 AH OSFC payment, and CIL would require reducing to NIL for these typologies. As a result, the charging rate of £50/m^2 proposed within the CIL DCS for "*Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution*" would be required to be removed altogether via modification.

vi. In a further apparent error, the 100-bed typology appraisal in Appendix A contains only 8% professional fees, as a cost allowance. However, para. 5.10 states clearly that modelling allows for " *10% of build costs and externals for professional fees associated with the build, including architect fees, planner fees, surveyor fees, and project manager fees*". This means a further cost omission within the viability testing of the PBSA typologies, which will further reduce the viability of this use if reintroduced to the viability appraisals for each PBSA typology.

vii. CBRE has set aside the above points, pending clarification from CYC.

viii. Taking a stand back approach, CBRE's cross-section of market intelligence in the sector is that the current minimum construction cost for developer-led mid-specification PBSA schemes in the regions, equates to circa £85,000 per bed. It is CBRE's direct experience that higher specification schemes, which seek to secure higher rents from students (and which primarily target the international student market) are incurring far higher costs.

ix. In **Table 2** overleaf, CBRE has set out both a comparison between the RICS BCIS median rate costs as at Q3 2022 and March 2023. CBRE considers these costs to be more likely representative of construction to a low-mid specification product, which would achieve a lower than average rental price point in the York market. As the definition in RICS BCiS states it would therefore be more appropriate to reflect student halls of residences (i.e. university-led on campus development), rather than the higher specification product being delivered off-campus by private developers, and those which can secure rents at an average for York (i.e. the £177/week) or above.

x. CBRE notes that the RICS BCIS upper quartile rate (£2,389/m^2 | £222/ft^2) generates a construction cost, when allowing for external works, that is commensurate with the level of costs being seen for mid-market specification PBSA schemes in the regions (at circa £84,500/bed). This is provided for comparison in **Table 2**.

xi. For the reasons set out above, CBRE strongly advocates that the RICS BCIS upper quartile rate should represent the base construction cost for viability testing developer-led (i.e. off campus) PBSA typologies. The median rate simply isn't a realistic cost benchmark to adopt for this purpose in the current market.

Table 2: Comparison Analysis: RICS BCIS Costs Q3 2022 vs. Q1 2023 vs. Minimum Market Rates (CBRE Q1 2023)

RICS BCIS Median Q3 2022			Build			External Works @ 10%		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,112	196	19,288	40,736,256	600	67,894	4,073,626	6,789	44,809,882	74,683	2,323	216
2,112	196	11,251	23,762,112	350	67,892	2,376,211	6,789	26,138,323	74,681	2,323	216
2,112	196	6,429	13,578,048	200	67,890	1,357,805	6,789	14,935,853	74,679	2,323	216
2,112	196	3,215	6,790,080	100	67,901	679,008	6,790	7,469,088	74,691	2,323	216
RICS BCIS Median Q1 2023			**Build**			**External Works @ 10%**		**Total Costs (Build + Externals)**			
£/m2	**£/ft2**	**GIA (m2)**	**Cost (£)**	**Beds (Typologies)**	**£/Bed**	**Cost (£)**	**£/Bed**	**Cost (£)**	**£/Bed**	**£/m2**	**£/ft2**
2,166	201.2	19,288	41,777,808	600	69,630	4,177,781	6,963	45,955,589	76,593	2,383	221
2,166	201.2	11,251	24,369,666	350	69,628	2,436,967	6,963	26,806,633	76,590	2,383	221
2,166	201.2	6,429	13,925,214	200	69,626	1,392,521	6,963	15,317,735	76,589	2,383	221
2,166	201.2	3,215	6,963,690	100	69,637	696,369	6,964	7,660,059	76,601	2,383	221
RICS BCIS Upper Quartile Q1 2023			**Build**			**External Works @ 10%**		**Total Costs (Build + Externals)**			
£/m2	**£/ft2**	**GIA (m2)**	**Cost (£)**	**Beds (Typologies)**	**£/Bed**	**Cost (£)**	**£/Bed**	**Cost (£)**	**£/Bed**	**£/m2**	**£/ft2**
2,389	221.9	19,288	46,079,032	600	76,798	4,607,903	7,680	50,686,935	84,478	2,628	244
2,389	221.9	11,251	26,878,639	350	76,796	2,687,864	7,680	29,566,503	84,476	2,628	244
2,389	221.9	6,429	15,358,881	200	76,794	1,535,888	7,679	16,894,769	84,474	2,628	244
2,389	221.9	3,215	7,680,635	100	76,806	768,064	7,681	8,448,699	84,487	2,628	244

Source: RICS BCIS / CBRE Data

c. **Site Areas for Typologies**: It is not clearly stated within the CIL Viability Study as to how the site areas applied for each typology were derived and the evidence used to inform this. Given this is an important basis for setting benchmark land values, CBRE requests that this information is provided by CYC to provided transparency and clarity to stakeholders.

d. **Benchmark Land Value**:

i. The CIL Viability Study includes the adopted BLVs for non-residential uses within Table 5.6 on p.52. However, the document contains no supporting justification or evidence to underwrite the proposed BLVs, which CBRE considers a significant omission.

ii. The CIL Viability Study proposes a BLV of £1.5m/ha (£607,000/acre) as the BLV to apply to PBSA typologies. In order to find justification for this BLV, CBRE has had regard to the earlier Technical Note titled *CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7 ('Policy H7 Technical Note')*, which was produced by PPE and which is dated August 2022. An explanation is provided in paras 20-23.

iii. This is predicated on a logic whereby it is proposed that abandoned or unviable locations and/or dilapidated industrial units will be the typical brownfield sites that will be brought forward for alternative uses, such as PBSA schemes. The transactions drawn upon in Table 4 of the Policy H7 Technical Note, which are cited as comparables, are not relevant to York and it is not stated whether any of the transacted sites were ultimately brought forward for PBSA development.

iv. CBRE is not aware of any abandoned, unviable or dilapidated industrial premises that could be redeveloped for PBSA use. There is presently a limited supply of sites suitable for redevelopment for PBSA uses across the city, which necessitates PBSA development competing with other forms of prospective development including hotels, traditional residential, elderly persons accommodation or offices.

v. CBRE is therefore unclear on the logic behind Table 5.6 in the CIL Viability Study, on p.52. This is replicated below. It sets a substantially lower BLV for PBSA development in comparison to competing uses such as Hotel and Care Home uses (both £2m/ha), supermarket use (£2m/ha) and retail warehouse use (£2m/ha).

Table 5.6 Benchmark land values for non-residential existing uses

Typology	BLV per gross area
1: Town centre office	£1,500,000
2: Business park	£1,000,000
3: Industrial / warehouse	£850,000
4: Small local convenience	£2,000,000
5: Supermarket	£2,000,000
7: Retail warehouse	£2,000,000
8: City Centre retail	£4,000,000
9: Hotel (60 beds)	£2,000,000
10: Student accommodation	£1,500,000
11. Care home (60 bed)	£2,000,000

vi. In addition, CBRE also notes that the CIL Viability Study adopts a BLV for residential typology viability testing of £1.7m/ha for brownfield land in its existing use as 'City centre / extension' land within Table 4.15 on p.47.

vii. The CIL Viability Study does not adequately justify why competing brownfield land uses have been viability tested against a higher BLV and PBSA against a lower BLV. This warrants further explanation by CYC.

viii. The risk is that this overstates the propensity for PBSA developments to acquire land at lower prices than competing uses, and through the proposed CIL rates applied to PBSA, then places them at a disadvantage when seeking to acquire land due to overstating viability and the further additional CIL costs applied.

ix. A rational approach would be for BLVs for this use to be considered by way of market transactional analysis of sites brought forward for PBSA use within the city of York in recent years. CBRE recommends that CYC seek to source and consider such evidence in taking a 'stand back' approach and a York-specific market sense-check.

Results & Re-appraisal

39. The CIL Viability Study sets out the results of viability modelling within Table 7.1 on p.61. This is replicated below for ease.

Table 7.1 Recommended non-residential psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of		
		50%	33%	25%
1: Town centre office	-£1,034			
2: Business park	-£906			
3: Industrial / warehouse	-£333			
4: Small local convenience	£154	£77	£103	£115
5: Supermarket	-£117			
7: Retail warehouse	£134	£67	£90	£101
8: City Centre retail	-£68			
9: Hotel (60 beds)	-£143			
10a: Student accommodation - 25 bed	£127	£64	£85	£95
10b: Student accommodation - 100 bed	£84	£42	£56	£63
10c: Student accommodation – 200 bed	-£16			
10d: Student accommodation - 350 bed	-£50			
10e: Student accommodation - 600 bed	-£152			
11. Care home (60 bed)	-£937			

40. Whilst the CIL Viability Study only appends a summary viability appraisal for PBSA typology 10b, Table 7.1 clearly demonstrates PPE's headroom analysis concludes that only PBSA typologies 10a and 10b can viably accommodate both any CIL and a 2.5% affordable housing equivalent OSFC contribution per student room as proposed under modifications published under CYC's draft Local Plan Proposed Main Modifications public consultation – specifically via modified Policy H7: Off Campus Purpose Built Student Housing.

41. This is notwithstanding CBRE and the consortium's representations that the conclusions within Table 7.1 and the CIL Viability Study are they themselves outdated and don't reflect deterioration in market conditions since Q3/4 2022.

42. With this in mind, Table 7.1 of the CIL Viability Study shows PBSA typologies 10c – 10e to all fall below the threshold of financial viability. This means they cannot accommodate any CIL, as there is no headroom, but critically these PBSA typologies are also demonstrated as generating negative headroom (shown in red). This means that PPE determine that they are now unable to even partially or fully meet the OSFC costs of Policy H7 whilst remaining financially viable – as they generate negative headroom **before** incurring additional CIL.

43. This directly contradicts Table 6 (replicated below) in the earlier published Technical Note titled *CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7 ('Policy H7 Technical Note')*, which was produced by PPE and which is dated August 2022.

44. The latter document accompanies CYC's draft Local Plan Proposed Main Modifications public consultation – specifically in respect of modified Policy H7: Off Campus Purpose Built Student Housing. The Technical Note, as specifically the conclusions in Table 6, was (and still is) being utilized as the viability evidence base to justify CYC's proposed requirement for off-campus PBSA schemes to provide a 2.5% affordable housing equivalent OSFC contribution per student room. This is replicated below for ease.

Table 6 PBSA scheme viability test at CYC Local Plan full policy and different OSFC rates

Scheme type	Land type	Viability and headroom			
		0% OSFC per student room (0% per Cluster unit)	2.5% OSFC per student room (10% per Cluster unit)	5% OSFC per student room (20% per Cluster unit)	10% OSFC per student room (40% per Cluster unit)
25-bed PBSA	Brownfield	£16,025	£10,276	£4,455	-£7,662
100-bed PBSA	Brownfield	£11,884	£6,151	£417	-£11,732
200-bed PBSA - low density	Brownfield	£11,095	£5,379	-£336	-£12,385
350-bed PBSA	Brownfield	£11,088	£5,386	-£316	-£12,326
600-bed PBSA	Brownfield	£8,794	£3,111	-£2,572	-£14,627

45. The CIL Viability Study now supersedes the earlier Technical Note and clearly demonstrates it is out-of-date. In the intervening period between the Policy H7 Technical Note being produced and the CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

46. Consequently, based on the CIL Viability Study results, there is no longer any evidenced justification for CYC seeking for off-campus PBSA schemes to provide a 2.5% affordable housing equivalent OSFC contribution per student room (particularly in 200+ bed typologies), as there is no longer sufficient 'headroom' demonstrable within the tested PBSA typologies to support this financial contribution.

47. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

48. Further elaboration is provided in PPG Viability (para. 002 ref: 10-002-20190509):

"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."

49. As clearly set out in both PPG and the RICS Guidance[7], the impact on viability of a CIL, whether proposed or existing, should be considered alongside the full policy requirements of the Plan – this should therefore include the demonstrable viability of PBSA typologies (off-campus) to provide a 2.5% affordable housing equivalent OSFC contribution per student room.

50. 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. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage. PPG Viability is explicit on this point, stating the following in para. 002 ref: 10-002-20190509:

    "Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."

51. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed required of Policy H7 is unsound and requires removal.**

52. Noting this issue, the CIL Viability Study also runs viability testing on PBSA typologies, specifically with the cost of meeting the 2.5% affordable housing equivalent OSFC contribution per student room **removed**, to determine CIL headroom to apply to on-campus PBSA. This is replicated in the following table.

Table 7.2 Recommended on campus student accommodation, psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of 50%	33%	25%
10a: Student accommodation - 25 bed	£421	£211	£281	£316
10b: Student accommodation - 100 bed	£374	£187	£249	£281
10c: Student accommodation - 200 bed	£272	£136	£181	£204
10d: Student accommodation - 350 bed	£238	£119	£159	£179
10e: Student accommodation - 600 bed	£135	£68	£90	£101

53. CBRE cannot support the levels of CIL headroom being identified within Table 7.2 above for the PBSA typologies, for the reasons set out earlier within this representation.

54. Firstly, there is an inconsistency in the level of buffer back from the calculated maximum headroom being recommended by PPE. For residential typologies (and proposed CIL rates) a buffer of 60% is advocated by PPE, citing market risk and uncertainty. However, for PBSA typologies only 25%-50% buffer is recommended

[7] RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14

for allowance in proposing the setting of the CIL charging rate at £150/m². CBRE considers this to be irrational and advocates for consistency in the applying of any buffer – which should be at the very least 50% across all typologies.

55. Even taken on basis presented in Table 7.2 above, scheme typologies of 200+beds do not demonstrate sufficient headroom to accommodate the proposed rate of £150/m² for off-campus PBSA development within the CIL DCS.

56. Secondly, the CIL Viability Study makes a 'leap of faith' in trying to bridge the viability gap (given inadequate headroom) by seeking (via para 7.6 on p.62) to place a reliance on the consortium effectively accepting a write down or waiving in the value of land within their control in order 'absorb' the impact of any CIL being charged – irrespective of BLVs, EUV or AUVs or the wider commercial and funding responsibilities and pressures on these institutions.

57. The consortium firmly reject this statement as representing a presumption, without evidence, that does not reflect the commercial or practical reality of the consortium's operations and land interests. Moreover, it is inconsistent with both the CIL Guidance and Regulations as a basis for setting rates.

58. Finally, given CBRE's analysis set out above firmly highlights both technical issues with the CIL Viability Study evidence base and that market conditions have deteriorated since its publication, CBRE has run independent viability modelling on PBSA typologies to determine the implications for CIL headroom in the current market.

59. This is set out in the following sub-section.

CBRE Updated Appraisal Modelling – On Campus PBSA Development

60. Firstly, CBRE has replicated (as far as possible given the limited transparency) the viability appraisals for the PBSA typologies 10b – 10e as set out in the CIL Viability Study.

61. Secondly, to replicate the approach currently taken by the consortium in providing student accommodation, CBRE has adjusted the rental rates from £177/week to adopt £156/week. As per the CIL Viability Study, OPEX is deducted at 30% of the gross annual rent to generate a net rental income[8].

62. Thirdly, CBRE has capitalised the net rental income at an investment yield of 5.0%. This is consistent with the CIL Viability Study. However, given CBRE's analysis[9], this yield is now expected to be overly strong for the current market and likely unachievable for the foreseeable. Hence, this represents an absolute best case illustrative position and is likely overambitious.

63. Fourthly, CBRE has increased the construction costs to reflect the RICS BCIS median cost as published at March 2023. This simply updates the costs from those utilised in the CIL Viability Study to the present day. Again, CBRE considers this dataset as lagging actual construction costs in the market, which are notably higher, but acknowledges that the rental point adopted for CBRE's appraisals is modest and hence assumes

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[8] Note: supporting justification for this approach, based on evidence, has already been set out earlier in this representation and is not repeated here for the reason of brevity.
[9] Note: see CBRE's earlier commentary and supporting evidence from CBRE and other leading agents.

a lower-mid-market specification would be acceptable. CBRE consider this to pose a risk given cost pressures, and hence again this represents an absolute best case illustrative position and is likely overambitious.

64. Finally, CBRE has not adjusted the external works and professional fees allowances utilised in the CIL Viability Study modelling – utilising the lower rates in the example appraisal appended to the document, rather than the higher figures referenced in the text. This therefore, again, adopts the most optimistic position absent of clarification from CYC.

65. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. This should not be taken as an endorsement, but is deemed reasonable and rational for the purposes of comparison – given it is not the responsibility of the consortium to prepare CYC's evidence.

66. Firstly, CBRE has run the appraisals inclusive of the (modified) Policy H7 requirement to provide a 2.5% affordable housing equivalent OSFC contribution per student room. A headroom analysis is provided below. Appraisal summaries are provided within **Enclosure 5**.

Table 3: Headroom Analysis (for CIL) Incorporating Modified Policy H7 OSFC – On-campus PBSA Development

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	-381	-190	-254	-286
10c	200-bed	-451	-225	-301	-338
10d	350-bed	-469	-234	-313	-352
10e	600-bed	-538	-269	-359	-404

Source: CBRE

67. In summary, the analysis in Table 3 above reiterates that there is no headroom for on-campus PBSA schemes to provide the affordable OSFC sought via Policy H7 (as modified) and CIL liability.

68. Subsequently, CBRE has removed the cost of the affordable OSFC sought via Policy H7 (as modified), which then solely assesses the propensity of the PBSA typologies to accommodate CIL[10]. A headroom analysis is provided below. Appraisal summaries are provided within **Enclosure 6**.

[10] Note: this replicates the methodology used in the CIL Viability Study and should be cross-referenced with the results shown in Table 7.2 from that document, which is used to inform the CIL rates proposed in the CIL DCS.

Table 4: Headroom Analysis (for CIL) Excluding Modified Policy H7 OSFC – On-campus PBSA Development

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	-166	-83	-111	-125
10c	200-bed	-236	-118	-157	-177
10d	350-bed	-255	-127	-170	-191
10e	600-bed	-325	-162	-217	-244

Source: CBRE

69. In summary, the analysis in Table 4 demonstrates that, in taking the most optimistic position in the current market and applying realistic university-led rents on-campus[11], that **there is no headroom for the PBSA typologies to accommodate CIL liability**.

70. It is also evident from this that the assertion within the CIL Viability Study that the consortium can absorb the cost of CIL liability proposed within an effective write-down of land value is fundamentally flawed.

71. In fact, it demonstrates the viability challenges being faced by the consortium in delivering additional student accommodation, which may necessitate the consortium needing to seek to gap fund viability deficits, which should not be further hindered through the introduction of a CIL charge.

CBRE Updated Appraisal Modelling – Off-Campus PBSA Development (Private sector-led)

72. In order to take a comprehensive approach, CBRE has also replicated the above methodology utilising present-day input assumptions for off-campus (developer-led) PBSA development scheme typologies.

73. Firstly, CBRE has set the rental rates back to £177/week to represent an average rate across the York market. OPEX is deducted at 30% of the gross annual rent to generate a net rental income. This is consistent with the CIL Viability Study inputs.

74. Secondly, CBRE has capitalised the net rental income at an investment yield of 5.0%. As set out earlier in this representation, most private-sector driven PBSA development has, and is expected to continue to be, institutionally funded. PBSA development funding yields are presently at circa 5.25% - 5.5% for prime regional locations, such as York. CBRE has taken the more optimistic stance of provisionally retaining the rate adopted

[11] Note: the rents chargeable by Askham Bryan College are demonstrably lower – and need to be so in order to remain affordable and competitive to their students (versus other equivalent institutions). As a result, the viability challenges faced in delivering new accommodation are even more acute. Separate appraisals have

in the CIL Viability Study, which represents a best case illustrative position as it would be unlikely to be achievable in today's market.

75. Thirdly, CBRE has increased the construction costs to reflect the RICS BCIS upper quartile cost as published at March 2023. This is deemed the most representative benchmark rate for current market construction costs for mid-market specification private-sector led PBSA schemes being brought forward in regional cities.

76. Finally, CBRE has not adjusted the external works and professional fees allowances utilised in the CIL Viability Study modelling – utilising the lower rates in the example appraisal appended to the document, rather than the higher figures referenced in the text. This therefore, again, adopts the most optimistic position absent of clarification from CYC.

77. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. As previously, this should not be taken as an endorsement, but is deemed reasonable and rational for the purposes of comparison – given it is not the responsibility of the consortium to prepare CYC's evidence.

78. Firstly, CBRE has run the appraisals inclusive of the (modified) Policy H7 requirement to provide a 2.5% affordable housing equivalent OSFC contribution per student room. A headroom analysis is provided below. Appraisal summaries are provided within **Enclosure 7**.

Table 5: Headroom Analysis (for CIL) Incorporating Modified Policy H7 OSFC – Developer-led PBSA Development

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	-173	-86	-115	-129
10c	200-bed	-251	-126	-168	-189
10d	350-bed	-276	-138	-184	-207
10e	600-bed	-355	-178	-237	-267

Source: CBRE

79. In summary, the analysis in Table 5 above reiterates that there is no headroom for off-campus developer-led PBSA schemes to provide the affordable OSFC sought via Policy H7 (as modified) and CIL liability.

80. Subsequently, CBRE has removed the cost of the affordable OSFC sought via Policy H7 (as modified), which then solely assesses the propensity of the PBSA typologies to accommodate CIL[12]. A headroom analysis is provided below. Appraisal summaries are provided within **Enclosure 8**.

[12] Note: this replicates the methodology used in the CIL Viability Study and should be cross-referenced with the results shown in Table 7.2 from that document, which is used to inform the CIL rates proposed in the CIL DCS.

Table 6: Headroom Analysis (for CIL) Excluding Modified Policy H7 OSFC – Developer-led PBSA Development

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	34	17	22	25
10c	200-bed	-44	-22	-29	-33
10d	350-bed	-68	-34	-45	-51
10e	600-bed	-146	-73	-98	-110

Source: CBRE

81. In summary, even when removing the cost of the affordable OSFC sought via Policy H7 (as modified), the developer led PBSA typologies remain marginal at best. Only typology 10b (100-beds) generates a surplus, and this is relatively nominal once allowing for a 50%+ buffer. No other typologies have any headroom available for either the affordable OSFC sought via Policy H7 (as modified) or CIL.

82. It is also important to note that the Table 6 appraisals include a 5.0% funding yield. If adjusted out to 5.25%, a sensitivity test in Table 7 below shows that this eradicates any prospective surplus to be directed either into the affordable OSFC sought via Policy H7 or CIL. Introducing a CIL liability on this typology would therefore risk the setting of the rate being at or beyond the margin of viability.

Table 7: Headroom Analysis (for CIL) Excluding Modified Policy H7 OSFC – Developer-led PBSA Development (Yield)

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	-77	-39	-51	-58

Source: CBRE

83. On the weight of the above (and enclosed) evidence, CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL. The appraisal summary is provided within **Enclosure 9**.

Lack of Transparency

84. There is a lack of transparency in the CIL Viability Study that CBRE deems falls short of the requirements and 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[13] and RICS Professional Standards[14], and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.

85. Specifically, only one example appraisal is provided for the PBSA typology (100-bed). This is inadequate and all appraisals for non-residential typologies (notably PBSA) should be issued. Notably, none of the typology appraisals are provided for the proposed CIL charging Zone *"Purpose Built Student Housing without an affordable housing contribution"*.

86. Without this 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 utilized to set proposed CIL rates is not published, available, and cannot be interrogated appropriately.

Failure to Strike an Appropriate Balance

87. In setting CIL rates, BCC must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. In accordance with CIL Regulation 14(1)[15], BCC 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.

88. As set out in PPG[16], Charging Schedules should be consistent with, and support the implementation of, up-to-date relevant plans.

89. 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.

90. As also clearly set out in the RICS Guidance[17], the impact on viability of a 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.

91. Moreover, CBRE concludes that it is illogical and counter-intuitive for CYC to introduce the proposed CIL rates for PBSA use development for the published CIL Viability Study document does not constitute up-to-date appropriate available evidence to underpin the proposed rates within the CIL DCS.

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[13] RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note
[14] RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition
[15] CIL Regulations 2010 (as amended)
[16] PPG CIL: Paragraph: 011 Reference ID: 25-011-20190901
[17] RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14

92. As a result, if submitted to PINS for examination in its present form and with the current evidence base, the consortium would strongly contend that the CIL DCS is unsound and should not be endorsed by the Examiner for the above fundamental reasons and further technical deficiencies expanded upon below.

93. If non-compliance could not be rectified via modification(s), the Examiner would be requested to reject the CIL DCS in accordance with Section 212A(2) of the 2008 Act.

Conclusions and Recommendations

95. The consortium cannot endorse or support the CIL DCS, and its underpinning evidence base in the form of the CIL Viability Study, as presently published.

96. In fact, for the reasons set out in this document and its enclosures, the consortium has fundamental doubts regarding the appropriateness of the timing of this consultation on a new CIL DCS. The consortium also has severe reservations regarding the questionable validity and dependability of the published viability evidence base upon which the proposed new charging rates for PBSA use development within the CIL DCS is reliant, and hence the legal compliance of the published CIL DCS with the relevant legislation and guidance.

97. On this basis, the consortium members cannot agree with CYC 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 unavoidably lead to the rejection of the Charging Schedule in accordance with Section 212A(2) of the 2008 Act.

98. The consortium therefore hopes that this feedback prepared by CBRE, and the accompanying commentary from O'Neill Associates, is useful to CYC in reconsidering whether it is rational, prudent and justified to be proceeding with pursuing adoption of a CIL charging regime under the current circumstances.

99. To rectify the issues identified, the consortium advocate that the CIL rates proposed to apply to PBSA development should be reduced to £0/m^2. CYC should undertake this action via modification to the published CIL DCS.

100. CBRE's evidence demonstrates this modification to the CIL DCS should also be undertaken in tandem with the removal of proposed modifications CYC's to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room on sites brought forward outside of land held by the consortium.

101. Nevertheless, should CYC determine to submit the CIL DCS for examination, in its current form and without rectifying the issues identified in this representation, the consortium 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.

102. Should CYC wish to engage directly with the consortium on the matter, CBRE will be able to facilitate such arrangements.

Enclosures

Enclosure 1: Schedule of Proposed & Adopted CIL Rates in Yorkshire & Humber Region

Local Authority	CIL status	Date	Residential Charges	Retail/Commercial Charges	Others
Barnsley	Draft Charging Schedule Published	17/10/2016	Four large residential charging zones with rates of £80, £50, £10, and £0 per square metre. Four small residential charging zones with rates of £80, £50, £30, and £0 per square metre.	Retail developments (A1) will be charged £70 per square metre.	No charge for all other uses.
Bradford	**Adopted**	21/03/2017	Four residential development charging zones with rates of £100, £50, £20 and £0 per square metre. No charge for specialist older persons housing.	Two retail warehouse development charging zones with rates of £85 and £0 per square metre. Large scale supermarket developments will be charged £50 per square metre.	No charge for all other uses.
Calderdale	Charging Schedule Submitted	11/01/2019	Six residential housing charging zones with rates of £85, £40, £25, £10, £5 and £0 per square metre. Two residential institutions and care home development charging zones with rates of £360 and £60 per square metre. Hotel developments will be charged at £60 per square metre.	Large convenience retail developments will be charged £45 per square metre. Retail warehouse developments will be charged at £100 per square metre.	All other chargebale uses will be charged £5 per square metre.
East Riding of Yorkshire	Draft Charging Schedule Published	23/01/2017	Five residential development charging zones with rates of £90, £60, £20, £10 and £0 per square metre.	Retail warehouse developments will be charged £75 per square metre.	No charge for all other uses.
Hambleton	**Adopted**	17/03/2015	Private market housing (excluding apartments) will be charged £55 per square metre.	Retail warehouses are to be charged £40 per square metre. Supermarkets are to be charged £90 per square metre.	No charge for all other uses.
Harrogate	**Adopted**	08/07/2020	Small scale residential developments will be charged £50 per square metre. Two charging zones for all other residential developments with rates of £50 and £0 per square metre. Two sheltered housing development charging zones with rates of £60 and £40 per square metre.	Three retail development charging zones for shops with rates of £120, £40 and £0 per square metre. Large supermarket and retail warehouse developments will be charged £120 per square metre. Small supermarkets will be charged £40 per square metre. Distribution developments will be charged £20 per square metre.	No charge for all other uses.
Hull	**Adopted**	23/01/2018	Two residential housing development charging zones with rates of £60 and £0 per square metre. Residential apartment developments will be charged £0 per square metre.	Large scale supermarket developments will be charged £50 per square metre. Small scale supermarket developments will be charged £5 per square metre. Retail warehouse developments will be charged £25 per square metre.	No charge for all other uses.
Kirklees	Examination Report Published	10/01/2020	Four residential charging zones with rates of £80,£20, £5 and £0 per square metre.	No charge for all commercial or industrial uses.	No charge for all other uses.
Leeds	**Adopted**	12/11/2014	Four residential charging zones with rates of £5, £23, £45 and £90 per square metre.	Two charging zones for supermarket developments with rates of £110 and £175 per square metre. Two charging zones for large comparison retail with rates of £35 and £55 per square metre. City centre offices will be charged £35 per square metre.	Publicly funded or not for profit developments will not be charged CIL. All other uses will be charged £5 per square metre.
Richmondshire	Preliminary Draft Charging Schedule Published	24/10/2016	Three residential development charging zones with rates of £120, £50 and £0 per square metre.	Supermarket developments will be charged £120 per square metre. Retail warehouse developments will be charged £60 per square metre. Neighbourhood convenience retail developments will be charged £60 per square metre.	No charge for all other uses.
Rotherham	**Adopted**	07/12/2016	Three residential charging zones with rates of £55, £30 and £15 per square metre. Retirement living developments will be charged £20 per square metre.	Large scale supermarket developments will be charged £60 per square metre. Large scale retail warehouse and retail park developments will be charged £30 per square metre.	No charge for all other uses.
Ryedale	**Adopted**	14/01/2016	Two residential charging zones with rates of £85 and £45 per square metre. No charge for apartment developments.	Supermarkets will be charged £120 per square metre. Retail warehouses will be charged £60 per square metre.	No charge for all other uses.
Selby	**Adopted**	03/12/2015	Three residential charging zones with rates of £50, £35 and £10 per square metre.	Supermarkets will be charged £110 per square metre. Retail warehouses will be charged £60 per square metre.	No charge for all other uses.
Sheffield	**Adopted**	03/06/2015	Four residential (C3 and C4) charging zones with rates of £80, £50, £30 and £0 per square metre. Hotel developments will be charged £40 per square metre. Student accommodation developments will be charged £30 per square metre.	Large retail developments are to be charged £60 per square metre. Three retail development (A1) charging zones with rates of £60, £30 and £0 per square metre.	No charge for all other uses.
Wakefield	**Adopted**	20/01/2016	Three residential charging zones with rates of £55, £20 and £0 per square metre.	Large supermarkets will be charged £103 per square metre. Retail warehouse developments will be charged £89 per square metre.	No charge for all other uses.

Enclosure 2: Schedule of 2022/23 Student Rents – Consortium Accommodation (excludes catering)

2023/24 Prices | Undergraduate University of York

Band	Catering	College or Halls	Bathroom	Let length (wks)	Per week	Per year
1	Self-catered	Halifax	Shared Bathroom	40	£99	£3,960
3	Self-catered	Halifax	Shared Bathroom	40	£156	£6,240
3	Self-catered	Derwent (Edens Court)	Shared Bathroom	40	£156	£6,240
2	Self-catered (weekly college meal)	David Kato	Ensuite	44	£148	£6,512
3	Self-catered	Alcuin	Ensuite	40	£173	£6,920
3	Self-catered (weekly college meal)	Goodricke	Shared Bathroom	44	£162	£7,128
4	Self-catered (weekly college meal)	Langwith	Shared Bathroom	44	£175	£7,700
4	Self-catered (weekly college meal)	Constantine	Shared Bathroom	44	£175	£7,700
3	Self-catered (weekly college meal)	David Kato	Ensuite	44	£179	£7,876
3	Self-catered (weekly college meal)	Anne Lister	Ensuite	44	£179	£7,876
3	Self-catered (weekly college meal)	Goodricke	Ensuite	44	£179	£7,876
3	Self-catered (weekly college meal)	Goodricke	Shared Bathroom	50	£161	£8,050
4	Self-catered (weekly college meal)	David Kato	Ensuite	44	£194	£8,536
4	Self-catered (weekly college meal)	Langwith	Ensuite	44	£194	£8,536
4	Self-catered (weekly college meal)	Anne Lister	Ensuite	44	£194	£8,536
4	Self-catered (weekly college meal)	Constantine	Ensuite	44	£194	£8,536
3 Large	Self-catered (weekly college meal)	Goodricke	Ensuite	44	£194	£8,536
				42		**£7,456**

2023/24 Prices York St John

College or Halls	Building	Type	Bathroom	Let length (wks)	Per week	Per year
St John central		Standard ensuite	Ensuite	41	£145.68	£5,973
St John central		Large ensuite	Ensuite	41	£153.35	£6,287
St John central		Studio	Ensuite	41	£198.57	£8,141
Limes Court		Standard room	Shared	44	£108.17	£4,759
Limes Court		Large room	Shared	44	£111.77	£4,918
City Residence		Standard ensuite	Ensuite	44	£127.83	£5,625
City Residence		Standard ensuite (refurbished)	Ensuite	44	£135.82	£5,976
City Residence		Large ensuite	Ensuite	44	£133.97	£5,895
City Residence		Large ensuite (refurbished)	Ensuite	44	£141.91	£6,244
The Grange	St Mary's	Standard room (communal area)	Shared	37	£116.74	£4,319
The Grange	St Mary's	large room (communal area)	Shared	37	£122.24	£4,523
The Grange	Grange House	Standard ensuite (communal area)	Ensuite	44	£135.82	£5,976
The Grange	Grange House	large ensuite (communal area)	Ensuite	44	£142.08	£6,252
The Grange	Grange House	Standard room (communal area)	Shared	44	£116.74	£5,137
The Grange	Grange House	Large room (communal area)	Shared	44	£122.23	£5,378
The Grange	Baldwin House	Standard room (communal area)	Shared	37	£109.65	£4,057
The Grange	Muir House, Lang House	Standard room	Shared	44	£107.15	£4,715
Garden Street		Standard ensuite	Ensuite	44	£121.70	£5,355
Garden Street		Large ensuite	Ensuite	44	£134.00	£5,896
49 Clarence Street		Standard ensuite	Ensuite	45	£135.27	£6,087
49 Clarence Street		Large ensuite	Ensuite	45	£145.88	£6,565
University Managed Housing		Standard - single bed (communal area)	Unknown	45	£160.00	£7,200
University Managed Housing		Large - double bed (communal area)	Unknown	45	£170.00	£7,650
University Managed Housing		Large - double bed ensuite (communal area)	Ensuite	45	£180.00	£8,100
				43		**£5,876**

2022/23 Prices (over 18 accommodation) Askham Bryan

College or Halls	Catering	Type	Bathroom	Let length (wks)	Per week	Per year
Coverdale	Self-catered	Single room	Ensuite	Unknown	-	£4,794
Standard Halls - Main Build	Self-catered	Single room	Shared	Unknown	-	£4,097
				32.29		**£4,446**

Enclosure 3: Investment Yield Guides – Q1 2023

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Click here to view previous data

Based on rack rented properties and disregards bond type transactions

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

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Knight Frank

LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

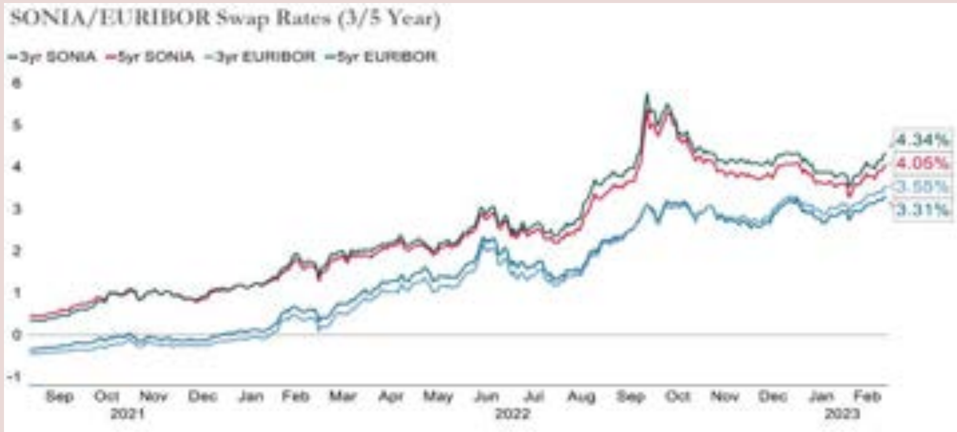
UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond



BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

Did you know

In addition to valuing assets in the main property sectors and having award winning teams in the Healthcare, Student and Automotive sectors, Knight Frank also has expertise in :

- Waste and Energy
- Infrastructure
- Garden Centres
- Film Studios
- Serviced Offices
- Data Centres
- Life Sciences
- Income Strips
- Ground Rents
- Trading assets
- Expert Witness
- IPOs

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We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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Knight Frank Research Reports are available at **knightfrank.com/research**

SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

CBRE

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

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Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

Enclosure 4: RICS BCIS – Rebased to York (March 2023)

BCIS®

£/m2 study

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	Sample
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

Enclosure 5: On-campus PBSA Development Typology Appraisals (Incorporating Modified Policy H7 OSFC)

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY	**CBRE**

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 2 100 (V2)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	35.90	6,666	466,620	666,600	466,620

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	466,620	YP @	5.0000%	20.0000	9,332,400

NET REALISATION				**9,332,400**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(969,750)	
				(969,750)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	201.23	5,748,622	**5,748,622**
Externals		10.00%	574,862	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	252,939	
				895,802
Other Construction				
Policy H10 AH OSFC Payment	100 un	7,000.00 /un	700,000	
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				927,550
PROFESSIONAL FEES				
Professional Fees		8.00%	505,879	
				505,879
DISPOSAL FEES				
Sales Agent Fee		2.00%	186,648	
				186,648
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(143,605)	
Construction			625,856	
Total Finance Cost				482,251
TOTAL COSTS				**7,777,001**
PROFIT				
				1,555,399

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	35.52%

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 8 200 (V2)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	35.90	6,666	933,240	1,333,200	933,240

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	933,240	YP @	5.0000%	20.0000	18,664,800

NET REALISATION				**18,664,800**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(2,207,494)	
				(2,207,494)
CONSTRUCTION COSTS				
Construction	ft²	Build Rate ft²	Cost	
Student accommodation - 200 bed typology	57,135	201.23	11,497,244	**11,497,244**
Externals		10.00%	1,149,724	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	505,879	
				1,839,603
Other Construction				
Policy H10 AH OSFC Payment	200 un	7,000.00 /un	1,400,000	
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				1,856,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,011,757	
				1,011,757
DISPOSAL FEES				
Sales Agent Fee		2.00%	373,296	
				373,296
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(405,329)	
Construction			1,588,023	
Total Finance Cost				1,182,694
TOTAL COSTS				**15,554,000**
PROFIT				
				3,110,800

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	30.83%

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 13 350 (V2)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	35.90	6,666	1,633,170	2,333,100	1,633,170

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,633,170	YP @	5.0000%	20.0000	32,663,400

NET REALISATION				**32,663,400**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(4,133,968)	
				(4,133,968)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	201.23	20,117,969	**20,117,969**
Externals		10.00%	2,011,797	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	885,191	
				3,200,988
Other Construction				
Policy H10 AH OSFC Payment	350 un	7,000.00 /un	2,450,000	
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				3,248,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,770,381	
				1,770,381
DISPOSAL FEES				
Sales Agent Fee		2.00%	653,268	
				653,268
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(877,607)	
Construction			3,239,568	
Total Finance Cost				2,361,961
TOTAL COSTS				**27,219,499**
PROFIT				
				5,443,901

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	28.27%

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 18 600 (V2)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	35.90	6,666	2,799,720	3,999,600	2,799,720

Investment Valuation					
Student accommodation - 600 bed typology					
Current Rent	2,799,720	YP @	5.0000%	20.0000	55,994,400
NET REALISATION				**55,994,400**	
OUTLAY					
ACQUISITION COSTS					
Residualised Price (Negative land)			(7,937,788)		
				(7,937,788)	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Student accommodation - 600 bed typology	171,394	201.23	34,489,615	**34,489,615**	
Externals		10.00%	3,448,961		
Site Abnormals	2 ac	400,000 /ac	652,000		
Contingency		4.00%	1,517,543		
				5,618,505	
Other Construction					
Policy H10 AH OSFC Payment	600 un	7,000.00 /un	4,200,000		
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000		
Policy G12 BNG	2 ac	15,000 /ac	24,450		
				5,574,450	
PROFESSIONAL FEES					
Professional Fees		8.00%	3,035,086		
				3,035,086	
DISPOSAL FEES					
Sales Agent Fee		2.00%	1,119,888		
				1,119,888	
FINANCE					
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)					
Land			(2,025,527)		
Construction			6,787,784		
Total Finance Cost				4,762,257	
TOTAL COSTS				**46,662,012**	
PROFIT					
				9,332,388	
Performance Measures					
Profit on Cost%		20.00%			
Profit on GDV%		16.67%			
Profit on NDV%		16.67%			
Development Yield% (on Rent)		6.00%			
Equivalent Yield% (Nominal)		5.00%			
Equivalent Yield% (True)		5.16%			
IRR% (without Interest)		25.81%			

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 6: On-campus PBSA Development Typology Appraisals (Excluding Modified Policy H7 OSFC)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 3 100 (V2b)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	35.90	6,666	466,620	666,600	466,620

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	466,620	YP @	5.0000%	20.0000	9,332,400

NET REALISATION				**9,332,400**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(279,534)	
				(279,534)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	201.23	5,748,622	**5,748,622**
Externals		10.00%	574,862	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	252,939	
				895,802
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	505,879	
				505,879
DISPOSAL FEES				
Sales Agent Fee		2.00%	186,648	
				186,648
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(42,215)	
Construction			534,248	
Total Finance Cost				492,034
TOTAL COSTS				**7,777,000**
PROFIT				
				1,555,400

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	33.19%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY	CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 9 200 (V2b)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 200 bed typology	200	37,135	35.90	6,666	933,240	1,333,200	933,240

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	933,240	YP @	5.0000%	20.0000	18,664,800

NET REALISATION				**18,664,800**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(827,941)	
				(827,941)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	201.23	11,497,244	**11,497,244**
Externals		10.00%	1,149,724	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	505,879	
				1,839,603
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,011,757	
				1,011,757
DISPOSAL FEES				
Sales Agent Fee		2.00%	373,296	
				373,296
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(156,396)	
Construction			1,359,535	
Total Finance Cost				1,203,140
TOTAL COSTS				**15,553,999**
PROFIT				
				3,110,801

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	28.80%

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY **CBRE**

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 14 350 (V2b)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	35.90	6,666	1,633,170	2,333,100	1,633,170

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,633,170	YP @	5.0000%	20.0000	32,663,400

NET REALISATION	**32,663,400**

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(1,723,560)	
		(1,723,560)

CONSTRUCTION COSTS
Construction

	ft²	Build Rate ft²	Cost	
Student accommodation - 350 bed typology	99,975	201.23	20,117,969	**20,117,969**
Externals		10.00%	2,011,797	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	885,191	
				3,200,988
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900

PROFESSIONAL FEES

Professional Fees	8.00%	1,770,381	
			1,770,381

DISPOSAL FEES

Sales Agent Fee	2.00%	653,268	
			653,268

FINANCE

Debit Rate 8.500%, Credit Rate 0.000% (Nominal)		
Land	(377,392)	
Construction	2,778,944	
Total Finance Cost		2,401,552

TOTAL COSTS	**27,219,498**

PROFIT

	5,443,902

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	26.34%

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY	CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 19 600 (V2b)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 600 bed typology	600	111,406	35.90	6,666	2,799,720	3,999,600	2,799,720

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	2,799,720	YP @	5.0000%	20.0000	55,994,400

NET REALISATION				**55,994,400**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(3,822,400)	
				(3,822,400)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	201.23	34,489,615	**34,489,615**
Externals		10.00%	3,448,961	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,517,543	
				5,618,505
Other Construction				
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				1,374,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,035,086	
				3,035,086
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,119,888	
				1,119,888
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(1,007,905)	
Construction			5,854,757	
Total Finance Cost				4,846,852
TOTAL COSTS				**46,661,995**
PROFIT				
				9,332,405

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	23.84%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 7: Developer-led (Off-campus) PBSA Development Typology Appraisals (Including Modified Policy H7 OSFC)

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 4 100 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(299,818)	
				(299,818)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	**6,339,110**
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				980,832
Other Construction				
Policy H10 AH OSFC Payment	100 un	7,000.00 /un	700,000	
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				927,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(48,110)	
Construction			676,317	
Total Finance Cost				628,207
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	31.48%

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY CBRE

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 10 200 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(925,895)	
				(925,895)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	**12,678,221**
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				2,009,664
Other Construction				
Policy H10 AH OSFC Payment	200 un	7,000.00 /un	1,400,000	
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				1,856,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(182,766)	
Construction			1,715,650	
Total Finance Cost				1,532,884
TOTAL COSTS				**18,716,657**
PROFIT				
				3,743,333

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	27.39%

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY CBRE

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 15 350 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000
NET REALISATION				**39,305,000**	

OUTLAY

ACQUISITION COSTS				
Residualised Price (Negative land)			(1,968,058)	
				(1,968,058)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	**22,184,452**
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				3,498,561
Other Construction				
Policy H10 AH OSFC Payment	350 un	7,000.00 /un	2,450,000	
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				3,248,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(448,777)	
Construction			3,500,754	
Total Finance Cost				3,051,977
TOTAL COSTS				**32,754,164**
PROFIT				
				6,550,836

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	25.12%

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY — CBRE

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 20 600 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION	**67,379,998**

OUTLAY

ACQUISITION COSTS				
Residualised Price (Negative land)			(4,411,795)	
				(4,411,795)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy H10 AH OSFC Payment	600 un	7,000.00 /un	4,200,000	
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				5,574,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(1,203,440)	
Construction			7,335,342	
Total Finance Cost				6,131,902
TOTAL COSTS				**56,149,986**
PROFIT				
				11,230,012

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	22.81%

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 8: Developer-led (Off-campus) PBSA Development Typology Appraisals (Excluding Modified Policy H7 OSFC)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY — CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION	**22,459,990**

OUTLAY

ACQUISITION COSTS				
Residualised Price			409,788	
				409,788
Stamp Duty			9,989	
Effective Stamp Duty Rate		2.44%		
Agent Fee		1.00%	4,098	
Legal Fee		0.80%	3,278	
				17,366
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				14,687,885
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			92,674	
Construction			1,487,163	
Total Finance Cost				1,579,837
TOTAL COSTS				**18,716,658**
PROFIT				
				3,743,332

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

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APPRAISAL SUMMARY — CBRE

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000
NET REALISATION				**39,305,000**	

OUTLAY

ACQUISITION COSTS				
Residualised Price			379,270	
				379,270
Stamp Duty			8,463	
Effective Stamp Duty Rate		2.23%		
Agent Fee		1.00%	3,793	
Legal Fee		0.80%	3,034	
				15,290
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				25,683,014
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			99,231	
Construction			3,040,130	
Total Finance Cost				3,139,361
TOTAL COSTS				**32,754,167**
PROFIT				
				6,550,833

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

APPRAISAL SUMMARY CBRE

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(376,826)	
				(376,826)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				1,374,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(105,374)	
Construction			6,402,315	
Total Finance Cost				6,296,941
TOTAL COSTS				**56,149,993**
PROFIT				
				11,230,005

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 9: Developer-led (Off-campus) PBSA Development 100-bed Typology Appraisal (Excluding Modified Policy H7 OSFC) with Funding Yield at 5.25% (Sensitivity)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227
NET REALISATION				**10,695,227**	

OUTLAY

ACQUISITION COSTS				
Residualised Price			7,307	
				7,307
Agent Fee		1.00%	73	
Legal Fee		0.80%	58	
				132
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	213,905	
				213,905
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			1,302	
Construction			584,710	
Total Finance Cost				586,012
TOTAL COSTS				**8,912,689**
PROFIT				
				1,782,538

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

RUSSELL GROUP STUDENTS' UNIONS

Student Cost of Living Report

Research commissioned by Russell Group Students' Unions

Carried out by Students' Union UCL

Contents

Foreword

The current cost of living crisis has been impacting everyone across society – from rising bills to record high food costs, to concerns over job security and the impact on our mental health. Throughout this crisis, however, students have been forgotten.

We, as elected representatives for students at Russell Group universities, commissioned this research to better understand the experiences of students and how we, universities and the government can help. The results are deeply concerning, although sadly not surprising for those of us who are hearing from struggling students daily.

This survey highlights the immense financial pressure on students. On average, students are sitting below the poverty line for the UK. 1 in 5 are considering dropping out because they cannot afford to continue, and 1 in 4 are regularly going without food and necessities. Students are unable to increase their earnings anywhere near the rate of inflation, with most working zero-hour, minimum wage jobs, and many struggling to increase their incomings, whether this is due to struggling to balance studies alongside increased working hours, or whether this is explicit working restrictions such as those imposed on our international student community.

Throughout this, financial support is inadequate, poorly understood and communicated, and often inaccessible to students. Groups of students who are already disadvantaged in education are hit the hardest, and this study shows that the cost of living crisis is posing a significant threat to our diverse and vibrant university communities – students except those from the most privileged backgrounds are set to be priced out of education.

It is clear that the impact of the cost of living on students is systemic and widespread, and requires an urgent, coordinated approach for targeted student support from the government and the sector. Maintenance loans need to rise in line with inflation, and grants should be reintroduced to support our most disadvantaged students. The parental threshold for maximum student finance support, which has been frozen since 2008 despite average earnings increasing significantly, needs to be reviewed. There needs to be sector-wide best practice agreed regarding university-run hardship and financial assistance funds. International students need more flexibility in their working restrictions, and should be able to access university financial hardship funds as standard.

Crucially, this research shows that students should be recognised as an at-risk group. They are particularly vulnerable to financial insecurity and hardship, and yet are often ignored or overlooked in conversations around poverty and cost of living. If we do not step up for students now, we run the risk of allowing UK higher education to become one only for the most privileged in society, and undoing decades of access and participating work in the sector.

Russell Group Students' Unions Officers

Students have been forgotten during the cost of living crisis. We surveyed students from 14 Russell Group institutions and found...

94% of students are concerned about the cost of living crisis

"I cry myself to sleep multiple times a week because my finances are killing my mental health."

1 in 4 students is regularly going without food or necessities because they cannot afford them

We received 8,800 responses

Over 50% of students have had to borrow money in the last year alone

54% of students believe that their academic performance has suffered due to the cost of living crisis

On average, students were left with only £50 per month

Only 1 in 2 students are confident that they have enough money to cover their basic living costs

72% of students feel that their mental health has suffered due to the cost of living crisis

Average income of only £825 per month

"I have had to miss classes because I've had to work in order to be able to eat."

"Everything is difficult but no one understands."

Income

"I am dependent on my overdraft"

The average student falls below the poverty line

The median income per month for students is £824, including income from maintenance grants, bursaries, paid employment and familial contributions. After housing costs (with the average student rent estimated at £535/month[1]), the average student respondent to this survey is likely to fall under the UK poverty line[2]. This leaves our respondents with £72 per week, and would put our respondents only £2 over the destitution line for the UK[3].

After paying for all expenses including bills and food, students are left with £50 each month to live off (median, weighted). This falls to £30 for international students, and rises to £100 for home students. More than 1 in 5 (22%, N = 5953, weighed) students have less than £100 in their savings account.

The top four groups who reported having less than £100 in savings:

- **Students whose parents have no qualifications** (34%, N = 144/423)
- **Students with a household income of less than £25,001/annum** (32%, N = 574/1801)
- **Students with caring responsibilities** (29%, N = 140/480)
- **International students** (29%, N = 501/1747)

Each of these groups were statistically more likely to have less than £100 in savings.

"I work the max amount that I can, yet I barely can cover my rent let alone anything else. ***I miss meals. I have had my physical and mental health deteriorate. I worry every day about how much change I have left.*** *And it was a 4-month long struggle with the university to even get any help."*

"The Cost of living crisis was always present for me, as in I come for Europe where higher education is practically free. My parents did not save, or expect me to go abroad. London is so very expensive. They are not rich and are in debt and refused to get me a loan to prevent me from getting to the same place in life as them. ***I have cried many nights about my choices to come to London where it is so very expensive to live and study.*** *I regret my choice because of the financial burden I have placed on my family."*

Students from socioeconomically disadvantaged backgrounds (measured by household income and level of parental education) rely more heavily on income sources such as maintenance loans, bursaries and hardship funds, whereas students from more advantaged backgrounds see parental contribution to expenses increase. Disadvantaged students are also significantly (p = < 0.001) more likely to have to borrow money to pay for rent or bills, with 3 in 5 (59%, N = 1048/1786) students with a household income of under £25,000/year reporting having borrowed money whilst at university, compared to 44% (N = 365/839) of students from the highest household income brackets (£75,001 or more). Similarly, students whose parents have no educational qualifications are nearly 1.5x more likely to have borrowed money compared to those whose parents hold a degree qualification or equivalent (59%, N = 247/418 vs 51%, N = 1854/3621).

17% (N = 464/2460, Figure 1) of students in paid employment are working more than 30 hours per week. This rises to 24% (N = 100/415) for disabled students, 40% (N = 257/639) for mature students, 36% (N = 55/153) for estranged or care experienced students and 35% (N = 81/235) for those with caring responsibilities.

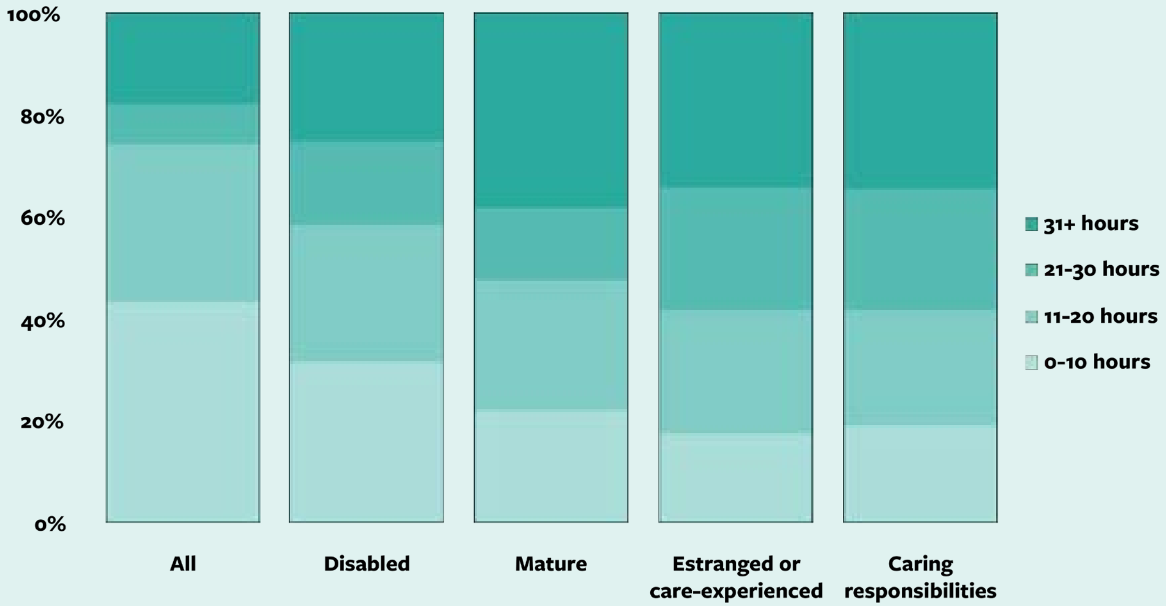


Figure 1: Stacked bar graph showing proportion of hours worked for students in paid employment by demographics (N=2460)

13% (N = 6327, weighted) of students are relying on overdrafts, and 6% (N = 6327, weighted) are using credit cards. Only 5% (N = 6327, weighted) have received financial support from a university hardship fund this academic year. Part-time (17%, N = 53/321), Black (16%, N = 28/171), home (16%, N = 513/3222) and disabled (16%, N = 141/881) students are all more likely to be relying on overdrafts. Similarly, disabled (6%, N = 55/881), students who are estranged or care-experienced (6%, N = 20/323), Black students (6%, N = 10/171), students with household incomes of under £25,001/annum (6%, N = 107/1895), and students studying outside of London (5%, N = 118/2156) are the most likely groups to have received financial support from their university.

Impact

Students report wide-ranging and significant impacts from the cost of living crisis, whether that is on their academic studies and career prospects, their mental health, their physical health, or their social development and relationships (Figure 2). Most commonly students report that their 'general student experience' has suffered due to the cost of living crisis, with 4 in 5 (79%, N = 5581, weighted) students reporting this, followed closely by their social life (73%, N = 5591, weighted), and their mental health (72%, N = 5595, weighted). 94% of students report that they are concerned about the current cost of living crisis (N = 5596, weighted).

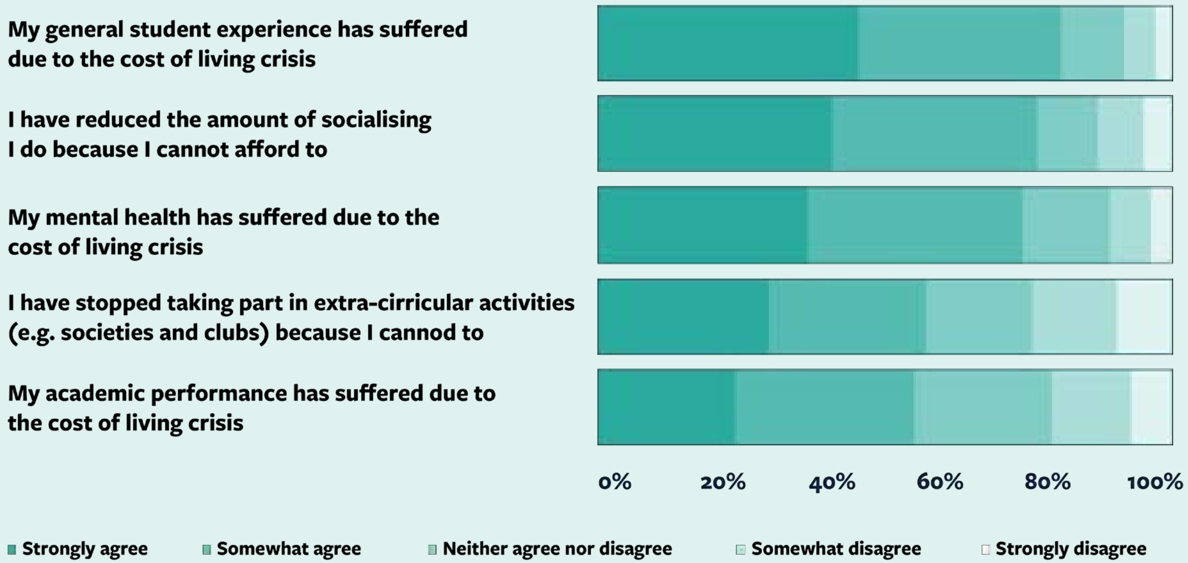


Figure 2. Stacked bar graph showing responses (N=5596) to likert-scale questions on the impact of the cost of living crisis

Whilst facing increasing financial pressures due to rising costs and limited ability to increase earnings (e.g. full time students struggling to work increased hours alongside their studies, or international students restricted to 20 hours a week), students note that socialising, extra-curricular activities and 'non-essentials' such as preventative health care (i.e. dental care) and mental health support are the first to go when cutting back. Students' academic studies are also impacted, particularly for students juggling additionally responsibilities such as childcare or having to take on additional paid work, and for students who already face additional barriers in education such as estranged and care-experienced students.

Academic Impact

Having to choose between food and university

1 in 5 students have considered dropping out

Over half (54%, N = 5589, weighted) of students are seeing their academic performance suffer due to the cost of living crisis. Reported negative impacts range from the direct and immediate, with students skipping classes to work more shifts or considering dropping out entirely due to financial pressures, to indirect impacts related to the ways in which the crisis intersects with health outcomes and nutrition, making concentrating on studying difficult or impossible.

19% (N = 5584, weighted) of all students have considered deferring their studies and 18% (N = 5582, weighted) have considered dropping out because they could not afford to continue. Students from disadvantaged socioeconomic backgrounds, disabled students, students who are estranged or care-experienced, and students with caring responsibilities are significantly more likely to be facing negative academic impacts and struggling to continue with their studies.

While 54% (N = 5589, weighted) of all students agree their academic performance has suffered due to the crisis, this rises to 71% (N = 278/389) for students whose parents have no educational qualifications. Estranged students, students with caring responsibilities, and disabled students are most likely to report considering dropping out of university. For estranged students, the lack of a familial safety net exacerbates their financial precarity. One estranged student said that they "can't afford to engage with the [academic] material", which "perpetuates the difficulties posed to those who deserve the opportunity to study, but with no familial/financial safety net". Another commented that "the university system is created to benefit white middle class students from stable backgrounds".

The likelihood that a student has considered dropping out or deferring due to financial difficulties gradually decreases as household income increases (Figure 3), however it is only for students from the highest income households (£75,000 or more per annum) that this drops below 15% for either question, suggesting that, whilst the impact is felt most strongly for those from the lowest income households, higher education during the cost of living crisis is becoming increasingly unaffordable to any students except those from the most advantaged backgrounds.

The top five groups who reported they had considered dropping out because they could not afford to continue were:

- **Estranged or care-experienced students** (37% (N = 127/343)
- **Students with caring responsibilities** (34% (N = 169/500)
- **Disabled students** (33% (N = 301/904)
- **Non-binary students** (30%, N = 40/129)
- **Part-time students** (28%, N = 91/319)

Each of these groups were statistically more likely to report considering to dropout of university.

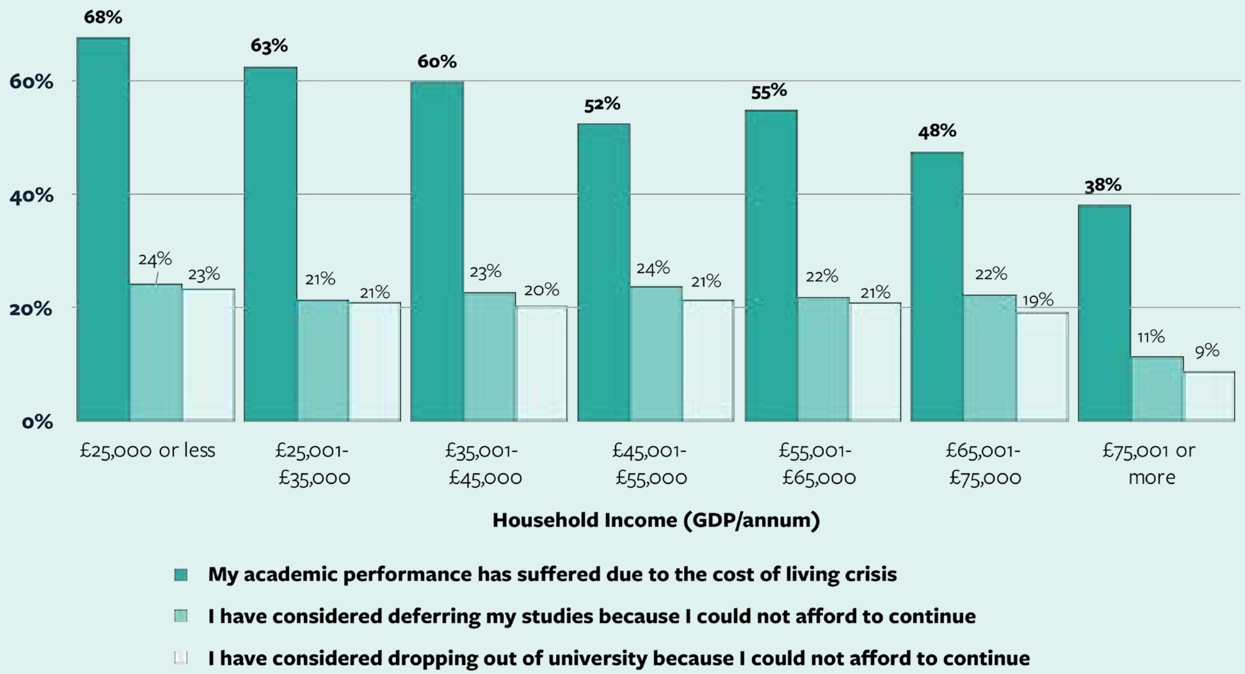


Figure 3: Grouped bar graph showing % agree by household income (GDP/Annum)

Students, particularly those from less advantaged backgrounds, commonly reported being forced to work increasingly long hours to pay for rising bills and living costs, or to take on multiple jobs. On average students are working 15 hours a week (weighted median), a figure rising to 25 hours for students with caring responsibilities (N = 235), estranged or care-experienced students (N = 153), and postgraduate research students (N = 404), and 32 hours for part time students (N = 218). Not only are students working significantly increased hours, but they also often report that the nature of the work is precarious and poorly paid. Respondents highlight that the precarity of having a job on a "zero hour contract" means that they "have to take shifts as they are available and cannot plan very far ahead". Others link their struggles to low pay, with one stating that "minimum wage does not match the rapid rise in the cost of living" and another that "in the two industries of work in which I have experience, hospitality and care, wages have been almost stagnant". Research by CIPD found that almost a quarter (23%) of full-time students aged 16-24 with a job were on a zero-hours contract, higher than any other age group[4].

Students are also seeing their studies impacted due to high costs of transport, with many having to study from home due to not being able to afford the cost of going into campus, even in well-connected cities such as London. Students report missing timetabled lectures and labs or skipping teaching entirely where they would have to travel, especially at peak hours. However, respondents' homes are often not fit to study in, with many reporting that their accommodation is small and/or poor quality, and that they have been unable to turn the heating on during winter, leaving them studying in the cold and becoming unwell. This tough choice many are facing was summarised by one student: "it's hard to work at home in these conditions, but expensive to travel to university and work there".

> ***"It's been a nightmare. Having to choose between food or funding something for Uni, and then being at risk of failing my degree."***

60% (N = 612/1019) of postgraduate research students feel that their academic performance has suffered due to the crisis, higher than any other study level. One PhD student stated that "it is becoming impossible to balance rent, utilities and food on the UKRI studentship rate", and another commented that for those whose research is lab based and requires you to be on campus every day, this has become "financially unviable". Similarly, International student respondents highlight the additional pressures and barriers they face which is exacerbating the impact of the cost of living crisis on them and their studies, with 59% (N = 1029/1746) reporting that their academic performance has suffered. International students report that visa limits on working hours, having no recourse to public funds, high tuition fees and limited access to financial support has led to significant financial insecurity and in turn impacts negatively on their studies.

"I have not been able to take part in some extracurricular activities which would benefit my learning and future career, *such as research projects/fieldwork, because I cannot afford this between the tuition fee and general cost of living."*

"Due to the living costs and having to buy so many research supplies and make research trips, ***I have used the majority of my savings.*** *I have had to move back with my parents as a result, which is nowhere near my university or the archive I need to access."*

"I have sadly decided not to attend an international conference in my field happening later this year. ***Being financially vulnerable means I am missing out on opportunities other students an easily have.*** *I am not having equal access to the same level of education and opportunities as other students due to my financial restrictions.* ***I routinely miss out on opportunities*** *such as this conference experience."*

"I also take on a lot of [graduate teaching assistant] work to try and supplement my stipend, as it is not enough to live on. This means I am able to spend less time on my PhD, which impacts my academic performance. ***PhD students shouldn't have to teach to live."***

"As an Iranian international student, I had to work and study and get money from my parents to just pay for one instalment [of tuition]. ***I could hardly focus to study, seeing my parents suffering every year to make the money I need for my tuition fees.*** *[My] mental health break down led to me failing the last year and had to repeat my modules this year."*

"It is extremely difficult to make ends meet as an international student with limited working hours during term time. The high fees add to the burden of paying off student loans, and lack of scholarships all tie in together to ruin a person's mental health. ***Academic performance is suffering due to financial stressors and being unable to afford basic necessities is affecting social life."***

The negative academic impacts of the cost of living crisis on students' academic experience is worsening existing concerns over the graduate job market and exacerbating low levels of skills confidence in our student population. Respondents commonly spoke about how financial difficulties result in concerns that they will not be able to achieve a high grade, and therefore will not stand out as competitive candidates in a tough graduate job market.

Many students are questioning whether their degree is 'good value for money', although this is unrelated to the quality of the course or content taught but reflective of concerns that their financial insecurity will prevent them from achieving a good grade, and therefore securing a good graduate job. This is often due to the high number of hours students are needing to work to meet basic expenses and the impact on their mental health that financial stress is having, all distracting from their studies and academic development.

Just 43% (N = 5580, weighted) of all students are confident about finding work after graduation, a figure that drops to 41% (N = 1213/2962) for undergraduate students. One student stated that employment post-graduation was the area which concerns them the most: "I am worried that due to the financial situation of the world right now, the workplace may be looking to increase salary cuts and layoffs rather than hiring university students". This worry is particularly acute for estranged students or students who are unable to move back in with their parents after graduating. Another student states that "I often worry about how I will pay for expenses after my degree finishes because there is no guarantee I'll get a job straight out of university and I don't see inflation slowing down anytime soon".

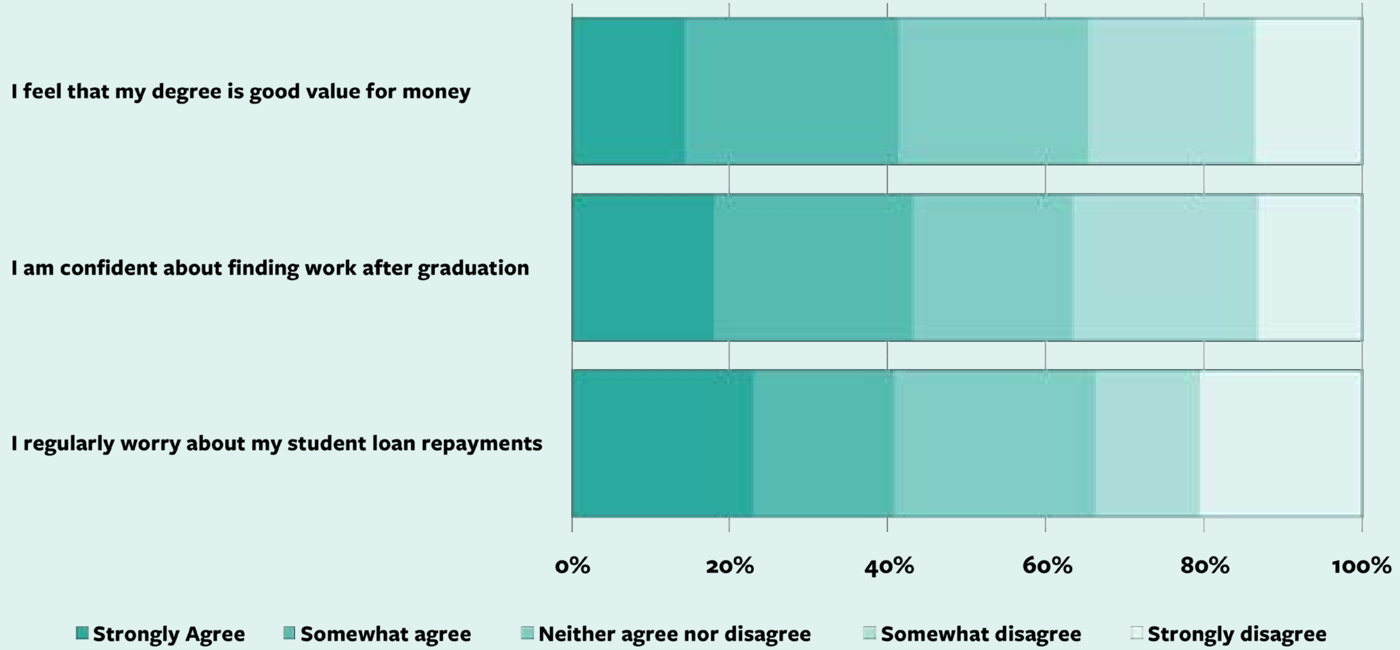


Figure 4: Stacked bar graph showing responses (N=5596) to likert-scale questions on the impact of the cost of living crisis

"I am an independent student who worked hard on the last 4 years to be able to go to university. I moved to London and started university thinking I would be fine because I had the opportunity to apply for a student loan, but I have been having problems with them because they keep delaying and during Christmas time they decided to cancel it. I have been struggling to do the course work, work part time and sort out my life, but I didn't have experience to be able to get a job as soon I moved to London. At the moment I cannot afford food or pay rent and with the cost of living crisis, ***I am scared I would not survive this year at university."***

"I am quite worried about how the cost of living crisis will affect my future career prospects and I feel more and more inclined to look for opportunities abroad. However, the financial burden of this is also weighing on me quite heavily. ***I feel very scared about my future after graduation*** *if I am struggling to afford necessities right now and* ***I am finding it increasingly difficult to make the most of my final year socially and emotionally."***

"It has made it hard to balance worrying about money with studies, and has ***increased the pressure to find a good job as soon as a graduate,*** *in order to pay off my overdraft which I have had to use for food etc whilst studying."*

Impact on Health

"It is ruining everything"

1 in 4 students regularly go without food

Students commonly report that the cost of living crisis is having a negative impact on both their physical and mental health. 72% (N = 5595, weighted) of all students reported that their mental health has suffered due to the ongoing cost of living crisis, and 1 in 4 (25%, N = 5591, weighted) regularly go without food or necessities because they cannot afford them. Students from London were, on average, significantly (p = < 0.01) more likely than students outside of London to report an impact on their mental health (75%, N = 2725/3624 vs 72%, N = 1393/1936). Students from marginalised communities -- such as disabled students, estranged or care-experienced students and those from socioeconomically disadvantaged backgrounds -- and who are already at higher risk of poorer health outcomes, were more likely to report regularly going without food.

Where students are unable to match rising costs by taking on more work, they are cutting back on spending money on things they deem 'less essential', such as heating, non-emergency health care and socialising. Many students report not turning on the heating at all over winter, given rapidly rising energy bills, which led to detrimental impacts on their health – and by extension, their ability to study and succeed academically. For one student, being "unable to afford to heat my flat" meant that they "fall ill every few weeks", with "very negative effect(s) on my studies". Another reported that not using the heating "has led to mould growing in all the rooms, leading to the worst asthma symptoms I've ever had". Almost 7 in 10 students would not be able to afford the costs of an emergency, including emergency dental or medical treatment. One student reported that "At the moment I have 3 jaw teeth from both sides that are broken and need urgent treatment, since I cannot afford it so I am living on Ibuprofen and other painkillers regularly".

Students also report cutting back on food, relying increasingly on cheap food with poorer nutrition, and skipping meals.

The top five groups who reported regularly going without food or necessities were:

- **Students with caring responsibilities** (40%, N = 203/504)
- **Estranged or care-experienced students** (39%, N = 137/347)
- **Disabled students** (36%, N = 323/906)
- **Students whose parents have no qualifications** (34%, N = 133/389)
- **Black students** (33%, N = 55/169)

Each of these groups were statistically more likely to report regularly going without food or necessities.

"Food in London is also quite expensive, so I often went to the supermarket to buy discounted food and stock up in the fridge. ***I spend very little money on food, sometimes just one meal a day."***

Disabled students are seeing their health particularly impacted by the crisis. One student said that "the particular impact on disabled students is often overlooked", raising the issue of unexpected costs such as "travel to appointments or the hospital". This is reflected in the responses to the question of whether students would be able to cover the cost of an emergency, with just 27% (N = 240/905) of disabled students saying yes compared to 34% (N = 1464/4318) of students with no disability.

*"I have found that **groceries are much more expensive, which makes it hard to cook large and healthy meals** and as such it can feel **harder to focus throughout the day whilst studying** as I do not want to spend the extra on snacks and healthy food."*

*"The food at university is so highly priced that **I cannot even remember the number of meals that I have skipped to save money."***

*"The cost of heating the flat is too high and so we don't use it. We've had mould around the windows. In late 2022, **I had to take a week off of university due to illness that I blame on the cold, or, at the very least, I blame the slow recovery on.** This put me significantly behind my study schedule."*

*"Living on dwindling savings and **not having the financial safety net to deal with emergency situations is stressful.** On top of that, you don't have enough money to socialise, support family, or pay for some mental and physical healthcare costs (e.g. therapy and dental)."*

*"Parents of children are not always considered in funding. I have children and a disability. **Financially, university is an immense strain."***

"I am estranged, so this comes with extra financial pressure.** Additionally, I have disabilities and mental health conditions that mean I need extra support in order to study as there are financial implications here too. I would say there is already more financial pressure on the people who are marginalised and the cost of living risis only exacerbates this. **It would be great to see additional financial support specifically for students who are in more vulnerable situations through no fault of their own."

The top five groups who reported a significant negative impact on their mental health were:

- **Students whose household income is below £25,000/annum** (83%, N = 1389/1679)
- **Disabled students** (82%, N = 739/905)
- **Non-binary students** (82%, N = 106/129)
- **Students whose parents have no educational qualifications** (81%, N = 317/390)
- **International students** (78%, N = 1357/1747)

Each of these groups were statistically more likely to have their mental health negatively impacted by the cost of living crisis.

Mental health was the most commonly reported impact of the cost of living crisis from students, with over 300 of the qualitative comments discussing the negative impact that the cost of living crisis is having on their mental health. Students are continually worrying about their finances and whether they will be able to afford necessities, socialising less which in turn exacerbates student loneliness, feeling guilty about the strain they are putting on family members who are supporting them, and anxiety regarding the graduate job market has been heightened.

For many students, difficulties finding affordable accommodation has exacerbated the negative impact the cost of living crisis is having on their mental health. One student said, “Honestly it made me suicidal, emotionless, and [feel] empty”, explaining how they ran out of savings due to poor health forcing them to defer their master’s programme twice. Speaking to the impact of rising rent, they said, “My rent doubled in the past 2 years, I cannot afford to heat my house, eat only cheap and basic food, cannot socialise.”

“My student loan doesn’t even cover my bills not even considering food. ***I have to earn an additional £500 each month just to pay my rent, electricity, Wi-Fi, transport etc and that’s not including food or any sort of fun.*** *This is generally really getting me down and I’m becoming super stressed. I love university and my course, and I am currently applying to graduate schemes so hopefully I get a job and a 1st in my degree, and everything will get somewhat better towards the end of the year. But* ***currently I am massively struggling financially, and this is having huge effects on my mental health.”***

“I knew London was a costly city before coming here but the cost of living crisis has only exacerbated this. ***Rent is astronomical and that is with me booking a cheap place further away from college.*** *Then my transport charges come up which makes me wonder if I made an unwise decision. I avoid eating out and am constantly thinking about my loans and how I’ll pay for them. This involves me continually applying for jobs which affects my study time.* ***Overall mental health is tanking.”***

“As a full-time postgrad student, I am not entitled to any government benefits, hence I need to cover all the costs - e.g., the rent and all the bills. ***Working whilst studying causes a lot of stress. I am constantly worried not having enough money, how I will survive from one month to next.*** *This impacts my anxiety levels and wellbeing in general.”*

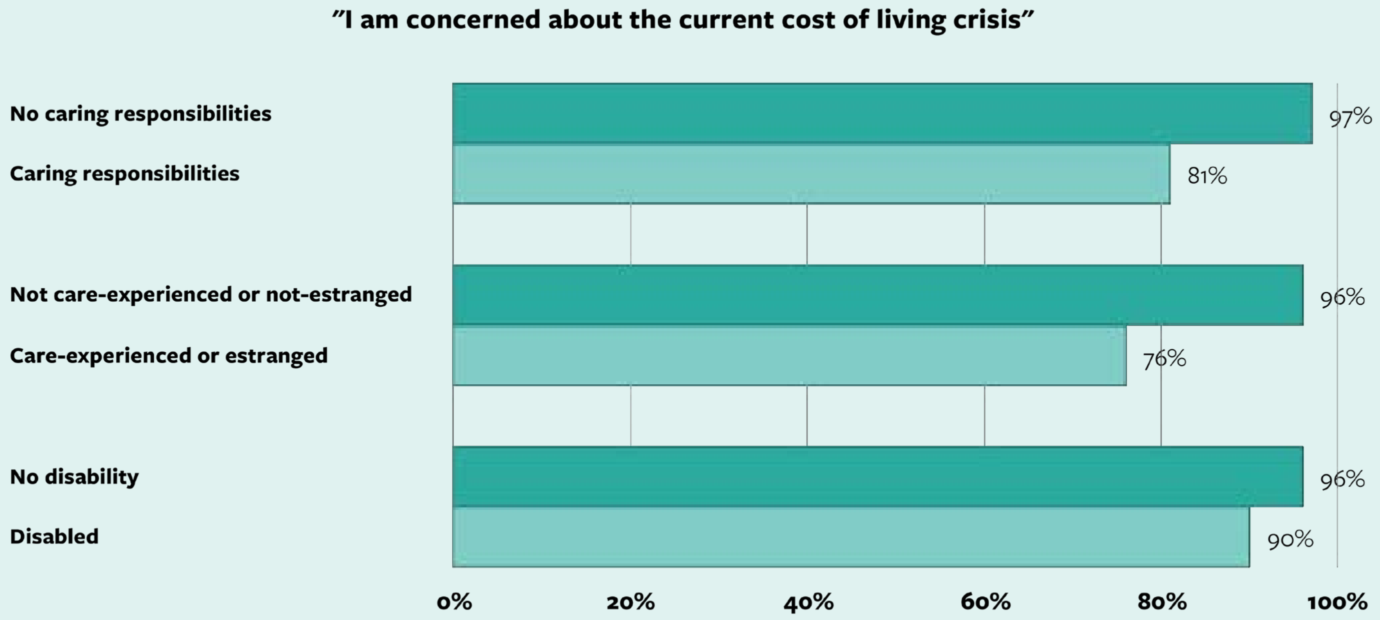


Figure 5: Grouped bar graph showing percentage of respondents who agreed to "I am concerned about the current cost of living crisis" by demographics

For many students, the impact on their mental health is exacerbated by multiple, intersecting factors, and those from marginalised communities see their mental health suffer to a greater extent. With research showing that individuals from low-income backgrounds, LGBT+ individuals, and minoritised racial and ethnic groups are more susceptible to poorer mental health than others due to personal, social, and environmental factors, the disparities in mental health outcomes between certain groups and the wider student population are unsurprising[5].

Students who were already vulnerable report being left exposed to additional, insurmountable pressures due to the cost of living. Disabled students, students with caring responsibilities, and care-experienced or estranged students are significantly less likely to be concerned about the cost of living crisis (Figure 5). However, these students are also all significantly more likely to go without food or necessities because they could not afford them; not be confident that they had enough money to cover their basic cost of living; or to consider dropping out or deferring university because they could not afford to continue. For these students, concerns regarding being able to financially cope at university are not new, however it is clear the cost of living crisis has exacerbated negative impacts regarding their academic studies, their health, and their social wellbeing.

Postgraduate research students are another group which is being disproportionately impacted by the crisis, with 77% (N = 1954/2550) agreeing that their mental health had been impacted, significantly higher than Undergraduate students (p = < 0.05). Postgraduate research students expressed discontent due to inadequate stipend provision, no financial support for write up periods, and the lack of consideration or adequate provision given to funding for postgraduate research students with children, all of which led to high levels of stress, anxiety and financial insecurity for this group of students.

"The entirety of ***last year was like living in a pressure cooker with the heat turned up each month,*** *I feel like I've lost a year of my PhD simply due to worrying about costs."*

"I am also not able to save for the future, including buying a house or starting a family. In many ways ***it feels like my life is on hold until after the PhD,*** *which has a large impact on my mental health and wellbeing."*

"The increased cost of living (especially sky rocking prices of single rooms in London) caused me to have to choose between a daily very long trajectory to university or having a few meters square single room. This causes a big strain on PhD students mental health, as ***we are expected to carry a heavy workload whilst enduring a hard living condition and not being able to do activities that cost money."***

"I dare you to live off this stipend *for just 3 months.* ***You will see that it's not really living."***

"I was thinking a lot to drop the program and go back to my country because ***the circumstances here are unbelievably terrible.*** *I am a mother with 2 dependants (with a husband and a child) ...* ***I was crying the whole nights and could not focus at all to read and study and do the assignments.*** *So, my academic situation is not going well at all. I'm really worried. When I go by trains, I see homeless people sitting in the stations and I'm afraid I would be just like them one day."*

Postgraduate research students also spoke about the lack of hardship and financial assistance available to them. They feel that, whilst institutions and organisations may be aware of the particular issues facing postgraduate research students, this has not been met with "appropriate action": "I noticed that all individuals and organizations understand the cost of living crisis for PhD students, but what we actually need is appropriate action - increase of stipend, support (canteen food, healthcare etc)."

As well as expressing anxiety about the present, it is clear that the cost of living crisis has exacerbated anxiety regarding the future, particularly the graduate job market and debt from university. 43% of respondents (N = 5587, weighted) regularly worry about their student loan repayments. One student spoke about the intersection between their mental health and their fears for life as a graduate: "My mental health has certainly been impacted, as I worry about getting a suitable job when I graduate, with enough money to be able to afford rising rent costs, skyrocketing bills and ridiculous food costs." These comments often align with students worrying about the future and thinking about dropping out of their course.

The top four groups who reported regularly worrying about their student loan repayments were:

- **Students whose parents have no qualifications** (55%, N = 215/388)
- **Students whose household income was below £25,000** (49%, N = 827/1674)
- **Disabled students** (49%, N = 445/906)
- **Students who are estranged or care-experienced** (47%, N = 163/346)

Each of these groups were statistically more likely to experience worry about their student loan repayments than their peers.

Although students on an SFE loan will not begin making repayments until they are earning above the current threshold (£27,295 as of January 2023), its looming presence for students is clear. One student stated that it is having an explicit impact on their mental health: “As a healthcare student it’s really hard. I’m left to question if I want to continue my studies as it’s getting harder to pay for all the bills and necessities. Even thinking about the huge amount of debt I’ll be in after I’ve graduated is having an impact on my mental health. I’m sure that other healthcare students feel the same too.” Another student commented that concerns regarding loan repayments is causing them to consider whether their degree is worth it:

“On top of an already stressful degree (medicine), it is added stress thinking about loan repayments and, considering how long it is, I have thought about dropping out many times.”

Where students are being shielded from the full financial impacts of the crisis, they are often relying on family, partners, friends and savings, or living at home to reduce costs, which in turn is impacting on their mental health. Feelings of guilt and shame are persistent throughout qualitative comments, with students’ families also struggling to meet rising costs. Speaking about their parent’s sacrifice, one student expressed their upset that their parents are “forgoing essentials like heating so that [I] can afford to study here.” Another student said, “My parents are spending twice the amount to send money from my home country. Seeing my parents worrying about money is affecting my mental health too. The money they send me is enough generally but this year it’s seeming too less.” This further exacerbates anxiety about the future and graduate job prospects; students are concerned that they will have to continue to rely on family for support, and are anxious to obtain a salary sufficient to allow them to repay those who have been supporting them.

4 in 5 students whose parents have no educational qualifications would not be able to cover the cost of an emergency

Only 35% of students with caring responsibilities are confident that they have enough money to cover their basic cost of living

67% of disabled students agree that their academic performance has suffered due to the crisis

"I am very lucky to come from a household that is financially well off and to have parental support but ***despite my parents being high earners I have felt almost constant anxiety about running out of money.*** *My rent alone is £300 more than my student loan a month, aside from bills and transport. I am forced to rely on parental support which I would rather not have to do seeing as I work 12 hours a week and used to be able to live relatively comfortably with the odd £100 here and there taken from my parents.* ***I cannot begin to imagine how stressful this situation must be for students from lower socioeconomic backgrounds or those who have to provide for their families.*** *Students are not eligible for most of the support payments from the government, so I wonder how people are coping. It is truly horrible."*

“Loneliness prevails and the fear of missing out is intense”

Over half (55%) of students have stopped taking part in extra-curricular activities because they cannot afford to

The cost of living crisis is having a significant impact on students’ social wellbeing: their ability to build and maintain healthy relationships and have meaningful interactions with those around them. 73% (N = 5589, weighted) of students have reduced the amount of socialising they do and 55% (N = 5590, weighted) have stopped taking part in extra-curricular activities (e.g., societies and clubs) because they cannot afford to.

Having a strong sense of belonging and community at university has been linked to better academic outcomes and improved mental health . Having strong student communities and extra-curricular opportunities is essential for equipping students with soft skills and experiences that will aid them in their future careers. Societies and clubs (often supported by Students’ Unions) are one of the most common ways for students to develop friendships, build their support networks, take on leadership roles, learn new skills and socialise. However, the most vulnerable students responding to our survey, and those who likely benefit the most from extra-curricular activities, are the ones who are more likely to stop engaging in them due to the cost.

*“**I’m scared that I won’t be able to afford food as I’ll be struggling to afford the roof over my head.** My mental health has gotten very bad because of this and **I’m struggling to find a work/life/study balance** but I need the money. I am unable to participate in clubs and socialise.*

The top five groups who reported having stopped taking part in extra-curricular activities (e.g., societies and clubs) because they cannot afford to were:

- **Students whose parents have no qualifications** (70%, N = 273/389)
- **Students whose household income was below £25,000** (70%, N = 1173/1678)
- **Black students** (68%, N = 115/170)
- **International students** (65%, N = 1139/1748)
- **Disabled students** (63%, N = 573/906)

Each of these groups were statistically more likely to have stopped taking part in extra-curricular activities because they cannot afford to.

Students from households with the lowest household income are almost twice as likely to stop engaging with extra-curricular activities than those with the highest (Figure 6). Whether it is joining fees for societies, the cost of travel to events, avoiding socialising in settings that involve purchasing food or drink, or simply the fact that any socialising or extra-curricular activity – free or not – takes away time that students could be undertaking paid work, students are not able to justify the expense of these opportunities whilst struggling to afford necessities such as food and rent.

"I have been unable to join any clubs or societies which has left me feeling isolated. I have had to take on more hours of work despite my illness to make ends meet, and have very little time to do anything for myself."

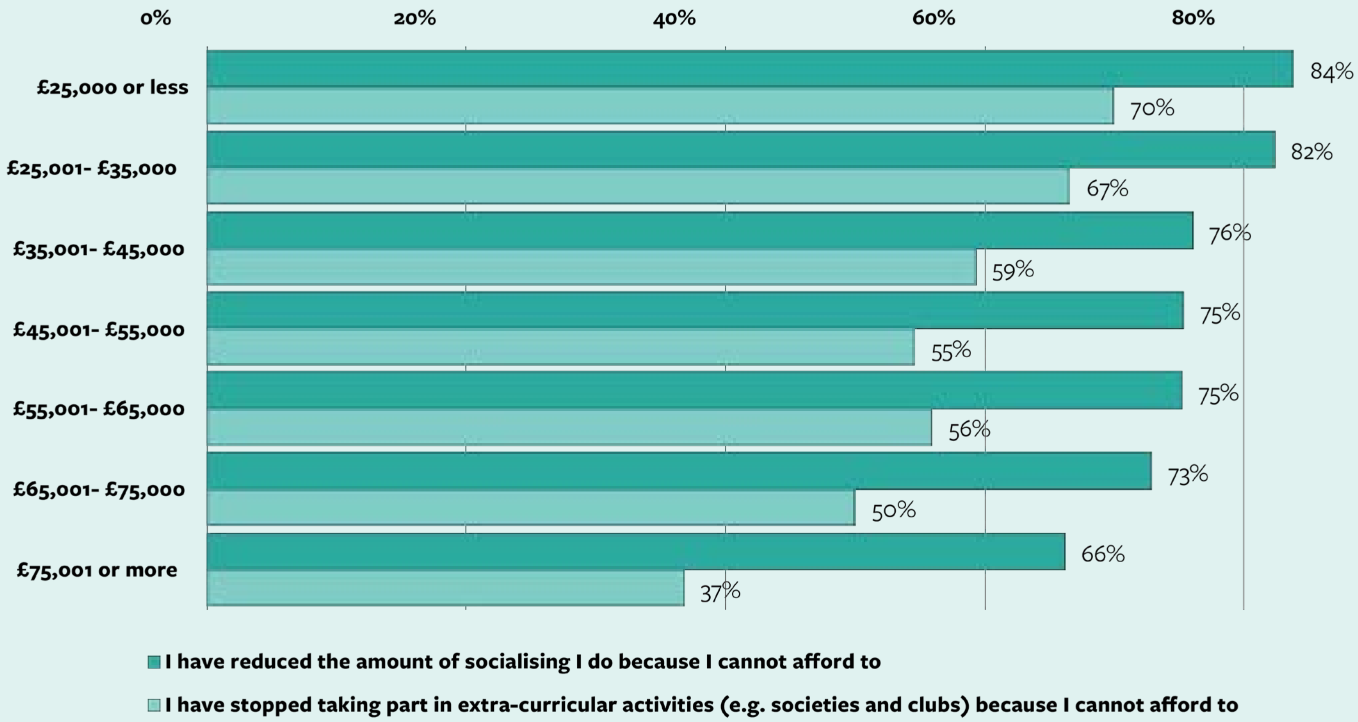


Figure 6: Grouped bar graph showing percentage of respondents who have reduced socialising or stopped taking part in extra-curricular activities by household income (GDP/annum)

"The money I have received from student loans/bursaries hasn't even been enough to pay my rent so I've had to get 2 jobs to be able to support this. My parents are struggling themselves so can't help finically. ***I've had to eat very little food in a week to save money, not joined clubs/ ocieties that I would've wanted to and only been out once or twice because I can't afford to.*** *Having 2 jobs has obviously affected my studies and t****he constant worry about being able to finically survive has hugely effected my mental health to the point of nearly dropping out multiple times."***

"It is always difficult to work part-time and study for assessments. There are situations where you can't ask your parents for money so you would have to stop socialising and not attend parties or avoid a take out. ***You're only studying and not engaging in any relaxing activities which made me more anxious and sad."***

Students report having to choose between food, heating and socialising/seeing friends, "a night out has been swapped for a day of heating", with the students finding that their "relationships have suffered" as a result. Social activity is often the first thing that students cut back on. Feelings that they "cannot justify the time and expense" featured commonly in the 198 comments on the impact to their social wellbeing that the cost of living crisis has had. For students who have been able to increase their part-time working hours, whilst they have been able to afford necessities, they have drastically reduced the amount of 'free time' they have. One student told us that they "have given up extracurricular activities to work part-time", with another saying that they "have had to work more hours meaning [they] cannot socialise".

With students socialising less, there is a concern that the cost of living crisis will further deepen the student loneliness epidemic. In 2022 23% of students felt lonely 'most' or 'all of the time'[7]. If students continue to cut back on seeing their friends due to fears of the cost then this figure is likely to increase significantly. One student stated that, due to the cost of living crisis, "I socialise less and ultimately feel more alone". After two years of online and hybrid teaching due to the Covid-19 pandemic, this year was supposed to be a return to normal. However students are unable to socialise how they want to, or sometimes at all, unable to afford to join campus clubs and societies and unable to maintain healthy relationships.

The top five groups who reported having reduced the amount of socialising they do because they cannot afford to were:

- **Students whose parents do not have qualifications** (86%, N = 333/389)
- **Students whose household income was below £25,000** (84%, N = 1403/1675)
- **Students from 'other ethnic backgrounds'** (82%, N = 287/348)
- **Postgraduate taught students** (82%, N = 1253/1529)
- **International students** (81%, N = 1415/1748)

Each of these groups were statistically more likely to have reduced the amount of socialising they do because they cannot afford to.

"My student life here is non existent because I cannot afford to go to society events, *which makes it generally hard to make friends and socialise with people."*

"The biggest impact has been on my social activities. ***The cost of living crisis comes up in conversation most days with my fellow PhD students.*** *I've stopped going out in the evenings with many people, although there are some more well-off students still go out, which can make me feel left out sometimes."*

"I want to do many things other students are doing but most things require money. *I need to take into account how much I'll have by the end and so, I'm normally unable to join them.* ***It is horrible."***

"It is the inability to have balance of living and enjoying everyday life, without considering if I will have enough money to cover me *if I want to do something different, or go out somewhere extra or explore."*

Support

The impact of the cost of living crisis is significant for students, with a variety of factors resulting in them being a group in society particularly vulnerable to financial insecurity. Many are unable to increase their earning potential to meet rapidly rising prices due to academic demands of their studies or due to explicit work restrictions (i.e. for international students), the support respondents already receive has not risen in line with inflation (i.e. student maintenance loans), and students are often not eligible for additional benefits or cost of living related government support.
Respondents commonly report feeling that support from universities and the government is inadequate, non-existent or inaccessible. When support is available there is often low awareness levels amongst students, and many do not access or face difficulties accessing support when they do know about it due to inaccessible procedures. When support is available and students are able to access it, respondents commonly noted that the support is vastly insufficient to offset the financial pressure they are facing.

Just 36% (N = 5590, weighted) of all students agreed that if they needed advice or help regarding money and finance, they would know how to access this. Nearly half (N = 2916/5927) of all students said they were not aware of their universities or Students' Unions hardship funds, the main source of financial support currently available to students. Students raised the issue of a lack of effective outreach and communication from universities regarding financial support, with one student commenting that "the lack of communication is appalling" and another raising the issue of university support being "inefficient and closed during holidays".

For particular groups of students existing funding is not, or was not perceived to be, accessible to them. For example, one student parent commented "none of the resources I see circulated by the University take into account the extra financial pressures faced by student parents", and another stated that mature students will "probably be less likely to know or have the confidence to ask for help". One part time student commented that "the University I attend only cares about full-time students and so I don't feel included in anything, or that there is the necessary help and support for those who do not fit into the 'norm' of students".

International students feel that support from universities regarding the crisis is not accessible to them. One stated that "there are not enough University resources, especially for international students", while another felt that "the financial aid that the university provides is exclusive and limited to local UK students". Many university hardship funds are accessible only to home students, have separate pots for international students with more limited resources, or only consider applications from international students in exceptional circumstances.

Even when students are aware of support that they are eligible to apply for, there are a range of barriers that mean the support is often inaccessible. While 49% (N = 2916/5927) are aware of university hardship funds existing, just 1 in 10 (N = 459/4209) said they had applied for them. Generally, students perceive that the application process is highly invasive and time consuming. This puts some students off applying altogether; one said "the process is so long and takes time and is still not a guarantee. I don't have time for this" and so instead decided to "spend this time looking for more work or other sources of income". Another "filled the form halfway and then quit because of stupid expectations", and a third described it as "an incredibly invasive application process". Students in great financial need also report being unsuccessful when they do make applications or having to re-apply consistently. One student reported that they have been homeless since September 2022 and said that they "felt as though the university has not helped me where I have explicitly begged for help". Another described "a 4 month long struggle with the university to even get any help".

"To access grants and schemes they always ask me how much my parents earn. I don't understand this logic. ***I am over 18 and supposed to be paying my parents for rent now but I can't even afford to buy my own things and cover uni travel costs without asking them for some money which isn't fair.*** *I only receive 500 in bursaries per year and it's very hard.Due to religious reasons I only took one initial student maintenance loan and then stopped because I cannot afford to take any more as I am not certain if I can pay it back despite working on the weekends. I'm also actively trying to get more work but it's hard and I don't know what to do."*

"You ask about hardship funds but we can't access those as easily as domestic and funded students can. ***Do I have money? Yes. Is it an insurmountable mountain of debt? Also yes.*** *Is this fair that some students are getting multiple stipends? Of course not. Does anyone care? No. So...this [cost of living] crisis has just made unfunded students more resentful of the [university], funded students, and the wealthy."*

"[My university] have a financial hardship fund that is meant to be accessible to all students. However they only will provide a maximum of £2,500 after an incredibly invasive application process. ***The process includes handing over a year's worth of bank statements and explaining any transaction over £200.*** *The most frustrating part is that after I applied, I was turned down. Their feedback was that, as an American student I could simply take out more loans... This is not helpful at all and incredibly frustrating. I do not want to put myself in more debt just to get an education that I am already in debt paying for.* ***It has been incredibly hard to continue my PhD. I am writing this in a room that is 10 degrees as I cannot afford to heat my flat. It is exhausting, it is frustrating, and most of all it is demeaning."***

University hardship funding is designed to cover unexpected financial shortfalls. However, the cost of living crisis is systemic and even if hardship funding was significantly increased and the process improved it would be unlikely to present a comprehensive solution given the extent of financial pressure respondents are experiencing.

In open comments, students expressed that government support is needed, and currently falling short. There is a widespread perception that "no government provision has been offered to students through the cost of living crisis" with students criticising a "lack of governmental coherence" and a "lack of leadership and guidance from the Government". Many commented on the fact that student loans have not increased in line with inflation, leading to the perception that "no adjustments are made to factor in cost of living by student finance", and there were also calls for Student Finance England to "reconsider the maintenance grant" allowance. The 20 hour working limit on international students' visas also contributes to hardship within these groups, limits the potential of students being able to increase income to meet rising costs, and this is another area where students feel the government should intervene.

Methodology

The survey was open from Monday 9th January to Monday 20th February 2023. 14 Students' Unions participated. It was promoted via Students' Unions to their respective student populations. The overall response rate was 8800 and these respondents were self-selecting. The results were weighted by London vs non-London respondents.

Demographics

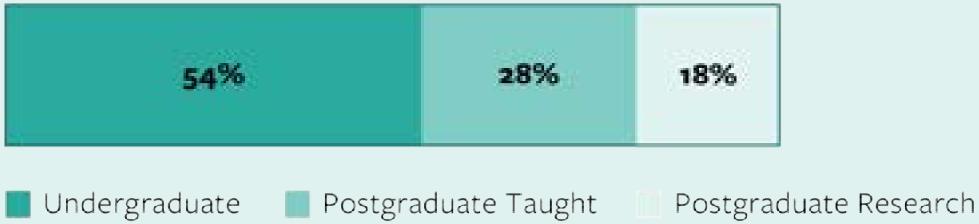
All: N = 8800
Gender: 66% women (including trans women) | 29% men (including trans men) | 2% non-binary | 1% prefer to self-describe | 2% prefer not to say
Level of study: 54% undergraduate | 28% postgraduate taught | 18% postgraduate research
Fee status: 59% home/ UK students | 10% EU students | 32% International students
Ethnicity: 30% Asian | 3% Black | 5% Mixed | 9% 'Other*' | 53% White
Disability: 16% disabled | 79% no-disability | 5% prefer not to say
*Other includes Arab, Hispanic/ Latino/ Latinx, Irish Traveller, Romani or Traveller, and ethnic background not listed

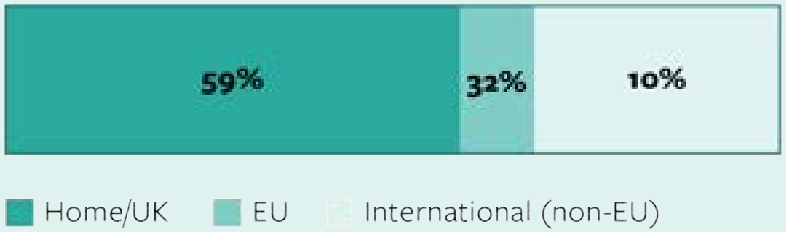
About the authors

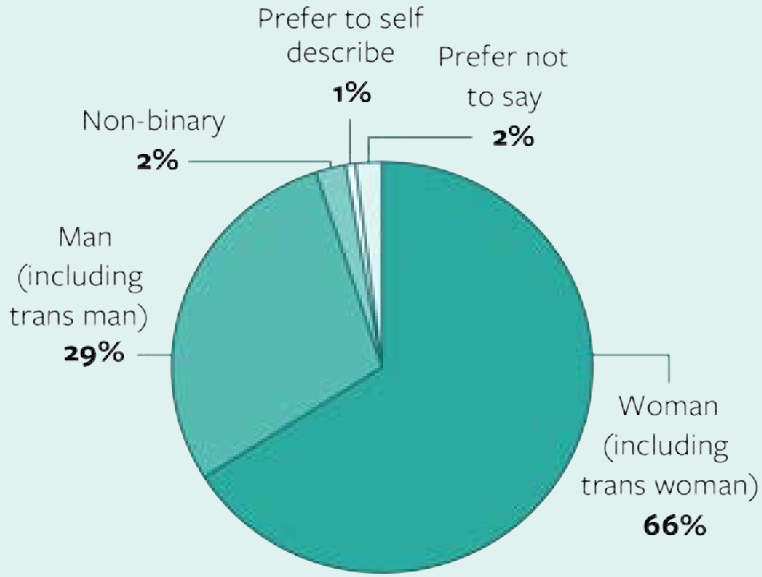
This study was commissioned by Russell Group Students' Unions and carried out by Dani Bradford, Policy and Research Manager, Meg Haskins, Policy and Research Coordinator, Jake Simms, Policy and Research Coordinator, and Carol Paige, Policy and Research Coordinator, within Students' Union UCL's Policy and Research department.

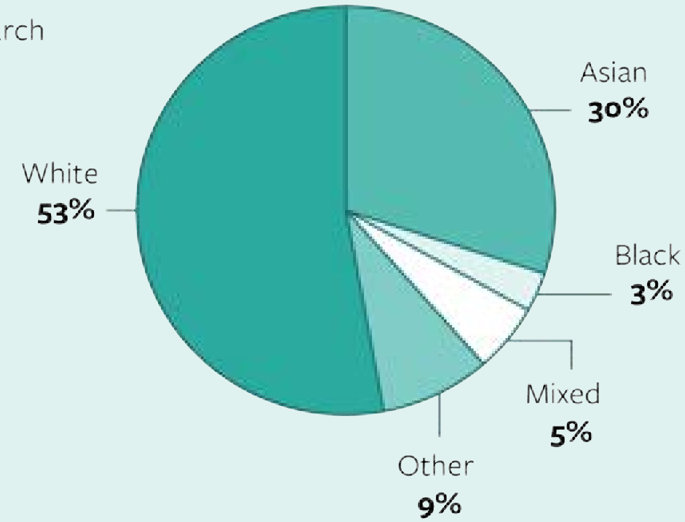
Queries regarding this research should be directed to hello@rgsu.co.uk

Demographics









Footnotes

[1] Savethestudent (2023) Revealed: The universities where students pay the most rent, Save the Student. Available at: https://www.savethestudent.org/accommodation/universities-students-pay-the-most-rent.html (Accessed: March 2, 2023).

[2] Poverty definitions and Thresholds (2020) Trust for London. Available at: https://www.trustforlondon.org.uk/data/poverty-thresholds/ (Accessed: March 2, 2023).

[3] Ibid.

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[5] Advancing mental health equalities strategy (2020). NHS England. Available at: https://www.england.nhs.uk/publication/advancing-mental-health-equalities-strategy/ (Accessed: March 8, 2023).

[6] Stress, Burnout and coping strategies in Preclinical Medical Students," North American Journal of Medical Sciences, 8(2), p. 75. Available at: https://doi.org/10.4103/1947-2714.177299.)

[7] Student academic experience survey - HEPI (2022). Available at: https://www.hepi.ac.uk/wp-content/uploads/2022/06/2022-Student-Academic-Experience-Survey.pdf

Published March 2023

25 Gordon Street. WC1H 0AY

RUSSELL GROUP STUDENTS' UNIONS

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #54 –

COMPLETE

Started:	Monday, March 27, 2023 2:40:14 PM
Last Modified:	Monday, March 27, 2023 5:30:42 PM
Time Spent:	02:50:27
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neill Associates

[redacted]

Contact details:

Organisation (optional)	O'Neill Associates
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

See attached document

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

See attached document

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

See attached document

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

See attached documents

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

See attached documents

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

See attached document

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

See attached document

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

See attached document

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

Chartered Town Planning Consultants

City of York Community Infrastructure Levy Consultation

27 March 2023

Response on behalf of Helmsley Group, Foss Argo Developments Ltd

INTRODUCTION

i. These representations are made on behalf of Helmsley Group and Foss Argo Developments Limited in response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023.

ii. The representation is supported by and should be read in conjunction with the Technical Representation prepared by CBRE and submitted with this representation.

iii. The Council's decision to introduce a CIL is welcomed because it provides greater certainty in terms of development costs, however the evidence base and charging schedule is fundamentally flawed and unsound.

iv. There has been no meaningful consultation with the development industry prior to the publication of the consultation documentation, except for a workshop with development industry representatives on 22 September 2016. Paragraph 1.11 of the CIL Viability Study (CVS) states that little further evidence was submitted to inform the assumptions in the CVS. However, the presentation at the workshop stated that there would be a public consultation on the preliminary draft charging schedule before this formal consultation period. It is hugely disappointing that the consultation on the preliminary draft charging schedule has not happened, as promised, and a significant weakness of the CIL evidence base that it has not been properly informed by specialists who work in the development industry day to day. Planning Practice Guidance (PPG) Viability (§2, Reference ID: 10-002-20190509) states that:

"*It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers*"

v. The CIL is proposed at a time of considerable uncertainty in terms of both the economy, and Central Government's changes to the developers' contributions regime proposed by the Levelling Up and Regeneration Bill. At the time of writing the Government has published its consultation on The Infrastructure Levy, and inflation was expected to be falling but instead has increased to 10.4% (up from 10.1%) and interest rates have risen from 4.0% to 4.25%. This wider economic picture of rising costs has fed through to rapidly increasing construction costs. Barbour ABI, the market leading provider of construction project information, reported that:

"Price rises were at record levels over summer 2022, with many goods seeing 25 per cent annual inflation. This has now dropped closer to 15 per cent, but some products still hover well above 20 per cent and insulation products have recently jumped to 50 per cent."

vi. Against this uncertain economic background, the Government has suggested a delay the full introduction of its proposed new Infrastructure Levy by up to 10 years due to uncertain of impact on the delivery of development. These same uncertainties exist with the current CIL system.

vii. We request to be notified about:

- submission of the CIL Draft Charging Schedule to the Examiner in accordance with Section 212 of the Planning Act 2008;
- the publication of the recommendations of the Examiner and the reasons for those recommendations; and
- the adoption of the charging schedule by the charging authority.

viii. In accordance with Regulation 21 of the CIL Regulations 2010 we wish to exercise our right to be heard by the examiner either as a consortium or as an independent stakeholder organisation.

ix. The questions (1-9) posed by the Council as part of this consultation and our responses are set out below.

QUESTIONS AND RESPONSES

1) Do you have any comments of the content of the CIL viability study?

Response

Yes, as set out below and please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

i. There is no Infrastructure Funding Statement as part of the consultation. As such it is unclear what will be delivered through CIL and what will be required to be provided by developers through S106 obligations to make a development acceptable in planning terms. Without this detail, it is not possible to fully understand the viability position of schemes. The Council's approach to on-site open space provision highlights this issue. Currently, the Council applies Policy GI6 (new open space provision) of the Publication Draft Local Plan which states:

"all residential development proposals should contribute to the provision of open space for recreation and amenity."

This is based The Open Space and Green Infrastructure Update 2017 (referred to in the local policy) which requires 40.5 sq m of amenity space for a 1 bed dwelling and 17.8 sq m towards sports. This is not typically possible to provide for on urban sites proposing even low densities, there is not the space. As such the Council typically requires an off-site contribution. Clearly, both on site and/or S106 contributions have a significant impact on viability which has not been considered in the CIL viability study. An example of the application of open space policy/ contributions can be found with reference to planning permission 19/00979/OUTM dated 1 July 2020 which relates to a former gas works that had viability issues even without CIL and therefore would have been undeliverable if the draft CIL charging schedule was applied.

ii. Similarly, the Council's approach to sustainable travel contributions and travel plan obligations which are also applied and are not considered as part of the CIL evidence base.

iii. Although the CVS takes account of S106 obligations the assumption about values and costs are averages. Paragraph 5 of the Consultation Information Booklet published with the CVS is explicit in stating:

"it is not required, and would be impossible, to look at every type of development individually, hence the use of typologies."

In practical terms what this means is that where a residential scheme liable for CIL has higher development costs that affect viability, and given that CIL is non-negotiable, it is the section 106 requirements such as affordable housing, that will be negotiated down. Delivery of affordable housing is a key objective of the emerging local plan which will be severely threatened by the introduction of the draft CIL Charging Schedule. Similarly, the Council has fallen short of its local plan targets for housing delivery for many years which is likely to worsen rather than address the existing backlog.

iv. Paragraph 4.44 of the CVS states that brownfield sites are assumed to include the necessary strategic infrastructure from their existing or previous use. However, this assumption understates the requirement on many brownfield sites to provide reinforced or completely new infrastructure. For example, the Council's drainage and flood risk policies require a 30% betterment for surface water drainage/ SuDS, and flood risk mitigation. As the Local Plans spatial strategy directs development to brownfield sites and the urban area this requirement will impact on a considerable number of development schemes.

v. Similarly, the majority of the city centre is located within an area of archaeological importance, and historic core conservation area. Both of these designations, and associated local plan policies increase development costs and have significant viability implications which are overlooked by the CVS.

vi. The viability evidence base is outdated and doesn't take any account of significant shifts in market conditions in Q3/4 2022. This matter is considered in detail in the CBRE representation.

vii. Viability evidence relies on RICS BCIS build costs. The supporting CBRE report finds these are too low and backward facing. For example, PBSA cannot be built at the costs being assumed and there are a number of errors which, if corrected, would erode any viability headroom for PBSA.

viii. The Planning Practice Guidance (PPG) plan making (paragraph: 039 Reference ID: 61-039-20190315) requires local planning authorities to:

"*prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable*".

This has not been undertaken for the emerging local plan in relation to its latest iteration given most policies have been subject to change during the course of the local plan examination.

ix. Similarly, National Planning Policy Framework paragraph 34, and PPG Paragraph: 002 Reference ID: 10-002-20190509 states that:

"*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.*"

x. The latest modifications to the emerging local plan increase policy requirements for most developments, particularly major developments. These policies have a cumulative cost impact when taken together. The Council does not appear to have fully considered how sites can also bear CIL given this demanding policy context. A full viability review and justifiable evidence of the modified policy requirements will be necessary. Policy requirements include (not exhaustive), the majority of which are not considered in the CVS:

a) 75% carbon reduction aspirations – policy CC2 (modification) (this is considered within CIL Viability study)

b) 10% Biodiversity net gain (this is considered within CIL Viability study)

c) Accessible Housing Standards (this is considered within CIL Viability study)

d) Archaeology – much of the city centre is within an archaeology area of importance which, taken on its own, gives rise to considerable risk and significant additional delay and development costs

e) H10(i) states:

"higher rates of (affordable housing) provision will be sought where development viability is not compromised".

This implies that development may be subject to additional affordable housing if it can be viably provided, and that a viability assessment will be required for all applications over 5 units which will delay the determination period significantly, particularly given to limited capacity of the District Valuer. Policy H10 requires all viability assessments to be reviewed by the District Valuer.

f) Changes to policy H7 and the requirement for nominations agreements.

g) Air Quality assessments/mitigation for all major applications

h) Flood mitigation measures. Policy requires a 30% betterment for surface water runoff which typically requires attenuation or SuDS, and much of the city centre is within high flood risk area. Again, taken on its own, flood mitigation gives rise to considerable risk and significant additional development costs.

i) Heritage policy. The vast majority of the city centre is within the York Historic Core Conservation Area and contains amongst the highest concentration of listed buildings and scheduled ancient monuments in England. These heritage constraints arising from national and local heritage policies, taken on their own, gives rise to considerable risk and significant additional development costs.

j) Travel Plan obligations e.g. car clubs, free bus travel, cycle equipment contributions, travel plan coordinator.

k) Green infrastructure/ on-site open space provision – the local plan including its evidence base prescribes totally undeliverable targets with regards for open space as part of new development and currently S106 payments are sought for any shortfall. Will this now be provided through CIL and does this mean no on site provision is required? If not, on site provision has significant viability impacts.

2) Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusion of the CIL Viability Study?

Response

No, the conclusions of the CVS are fundamentally flawed, contain a number of errors and do not justify the draft CIL charging schedule, for the reasons set out below and please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached:

i. The proposed rate or rates would seriously undermine the deliverability of the emerging local plan, particularly with regards to residential completions, PBSA completions, delivery of affordable PBSA and housing, new open space delivery, and brownfield first principles, amongst others.

ii. It is essential that the CIL rates are set at a level which ensures that most developments remain robustly viable over time as development costs change – most likely upwards. As such CIL rates should not be set at a marginal viability point. It is vital for the Council to build in a significant degree of flexibility to ensure durability of the CIL charging schedule. The submitted evidence has been overtaken by rapidly changing economic circumstances and an evolving planning policy context and fails to take account of the following, amongst other aspects:

   a. National consultations on changes to NPPF and CIL
   b. Changes in the housing market and house prices
   c. Changes in inflation, interest rates and the cost of borrowing
   d. Changes in build costs

iii. The residential rates are too high, unjustified and are amongst the highest, if not the highest across the entirety of Yorkshire and Humber, even when allowing for indexation since adoption in other charging authorities. The Council has not provided comprehensive, robust and up-to-date justification for these charges as required by regulation 14(1) of the CIL Regulations (as amended). This is not the case, as shown in the detailed evidence prepared by CBRE that accompanies this response.

iv. The CVS has not properly understood development costs, particularly for brownfield sites. The notion that allocated sites within the local plan incur greater development costs than other residential sites in unjustified. Significantly, the CVS has not adopted a comprehensive and robust 'policy on' approach with the full cost of the emerging local plan policies (including affordable housing) being accounted for, and taking precedence over, the introduction of CIL rate setting.

v. The proposed PBSA CIL rates are also too high and unjustified. By increasing the cost of student housing, it will reduce the affordability of student accommodation for which there is an immediate and growing need. The CIL rates in relation to student accommodation seriously risk constraining PBSA development, which is contrary to the Council's stated aims of supporting and encouraging Askham Bryan

College and the universities' growth and sustainability, and also its draft economic strategy.

vi. Planning applications will no longer be submitted for retail uses, instead they will refer to Class E of the use class order. How will the Council apply the charging schedule to planning permissions that simply apply for class E and do not distinguish between retail or office for example?

vii. It is counter-intuitive that development costs of brownfield sites are lower than greenfield sites for Extra Care accommodation. The proposed CIL rates are contrary to Government and local plan objectives of brownfield first. It is understood that other parties will submit viability evidence challenging the draft CIL charging rates for retirement living.

3) Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Response

No, the proposed CIL rates do not support delivery of the emerging local plan and would have a disastrous effect on local development projects for the reasons set out below and please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached:

i. The 'appropriate balance' is the level of CIL which maximises the delivery of development and supporting infrastructure in the area. This has not been justified and there is a lack of clarity in how the CIL will be allocated and spent.

ii. The *CIL Infrastructure Funding Gap Assessment (IFGA)* and *Consultation Information Booklet (CIB)* documents issued with the Draft Charging Schedule set out to identify the cost of infrastructure required to support new development and where it is to be spent. However, there is a lack of clarity between the documents. For example, the IFGA identifies a cost of £47.3 million required for "Education". However, section 10 of the CIB, states that Infrastructure for the purposes of CIL spend "can" include transport, flood defences, schools, hospitals and other health and social care facilities.

iii. This provides no certainty or clarity, for example, for residential developers as to whether they will be paying CIL and a Section 106 contribution for education; flood alleviation; or health facilities.

iv. The Charging Schedule therefore needs to state clearly what the CIL will be spent on so that developers can make a proper assessment of whether the CIL and S106 costs on a scheme be viable or whether necessary development will be inhibited.

4) Do you have any comments on the proposed CIL rates?

Response

Yes, as set out below and please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.:

i. The CBRE report provides a detailed analysis of the proposed CIL rates, particularly the residential and PBSA rates, and questions their appropriateness given the current uncertain economic environment facing the property and construction sectors. Viability is becoming more challenging as high levels of inflation in build costs are proving persistent and sales values remain static or at best are increasing at below the rate of build cost inflation.

ii. With regards to the Residential CIL rate, this must be considered in the context of the acknowledged poor delivery of housing in the city over a long run period. Evidence we have presented to the Local Plan Examination, using the Council's own data, demonstrates that in the 10 years 2013/13 to 2021/22, house completion rates fell below the OAH of 790 in 7 of those years. However, the Council's housing completion data includes student accommodation. If student accommodation is excluded, housing completions fell below the OAHN for 9 of the 10 years.

iii. Furthermore, the Council's Housing trajectory set out in supporting evidence to the Local Plan Examination, shows that a cumulative undersupply of housing will persist until 2023/24 – i.e. 7 years into the Plan period. Our analysis indicates it will persist until 2024/25, 8 years into the Plan period (See Appendix A).

iv. In this context of long-term undersupply of housing, the imperative is clearly to implement the NPPF requirement to significantly boost the supply of housing. Against this background, the proposed £200 psm rate for housing, the highest rate in the Yorkshire region, seems clearly anomalous and could seriously impede the delivery of housing so desperately required to make good more than a decade of undersupply.

v. A more sophisticated approach to the proposed rates would be setting a distinct city centre zone given the city centre commands the high values but also is subject to significant development cost because it is within an area of archaeological importance (huge risk/ cost for developments historically and in the future), the city centre is all in the historic core conservation area, and most is high flood risk. The rest of the city commands lower values but lower development costs (typically).

5) Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed

Response

i. Please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

6) Do you have any comments on the draft Instalments Policy?

Response

Yes, as set out below:

ii. There is no certainty with regards to larger schemes over £500,000. For example, what happens if the developer and Council are unable to agree a project specific payment schedule?

iii. Please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

7) Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Response

i. Yes, please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

8) Do you have any other comments on the draft CIL Charging Schedule?

Response

Yes, as set out below:

i. Please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

ii. The draft CIL Charging Schedule of rates is not well written, particularly in respect of PBSA development.

iii. The definitions are ambiguous e.g. it is unclear what happens in circumstances where PBSA cannot viably provide affordable housing. Will it be subject to CIL because it falls within PBSA without affordable housing? Clearly, if a PBSA scheme cannot support and affordable housing requirement, it is equally, unlikely to be able to support CIL requirement in which case development of necessary student accommodation would be stifled.

9) Do you have any other comments on the CIL evidence base?

Response

i. Yes, please refer to the City of York CIL Charging Schedule Consultation Technical Representations by CBRE, attached.

(ref:ylp2303.CIL reps.V8)

APPENDIX A

Table 1 Revision to the "Table 1 CYC Housing Trajectory, August 2022" in Housing Trajectory Note August 2022 CYC_EX_107_1

Table 1 revision to the "Table 1 CYC Housing Trajectory, August 2022" in Housing Trajectory Note August 2022 CYC_EX_107_1

		TOTAL	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	Total for Plan Period	33/34	34/35	35/36	36/37	37/38	Total 5 yr post plan	Post 2038
1. Net Housing Completions 2017 to 2020			**Actual Completions**																							
	Net Housing Completion		1296	449	560	622	402												3329						0	
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		35	2	67	82	252												438						0	
Total			1331	451	627	704	654												3767							
2. Housing Allocations Below 5 ha (H Sites)																										
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607									215		392						607						0	
H3	Burnholme School	83							63	15	5								83						0	
H5	Lowfield School	165						69	24										93						0	
H7	Bootham Crescent	93						25	35	33									93						0	
H8	Askham Bar Park & Ride	60									35	25							60						0	
H10	The Barbican	187											187						187						0	
H20	Former Oakhaven EPH									36									36						0	
H29	Land at Moor Lane Copmanthorpe	92							2	40	50								92						0	
H31	Eastfield Lane Dunnington	82						6	40	37									83						0	
H38	Land RO Rufforth Primary School Rufforth	21							10	11									21						0	
H39	North of Church Lane Elvington	32									17	15							32						0	
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	117							20	35	40	22							117						0	
H52	Willow House EPH, 34 Long Close Lane	15									15								15						0	
H53	Land at Knapton Village	4									4								4						0	
H55	Land at Layerthorpe	20										20							20						0	
H56	Land at Hull Road	0					0												0						0	
H58	Clifton Without Primary school	15								15									15						0	
Annualised Projected Completions H Sites (Hide)						**0**	**0**	**100**	**194**	**222**	**381**	**82**	**579**	**0**	**0**	**0**	**0**	**0**	1558	**0**	**0**	**0**	**0**	**0**	0	
3. Housing allocations above 5ha (ST Sites)																										
ST1a	British Sugar/Manor School	1100										150	150	150	150	150	150	150	1050	50					50	
ST1b	Manor School	100											35	35	30				100						0	0
ST2	Former Civil Service Sports Ground Millfield Lane	263				0		53	78	52	50	30							263						0	
ST4	Land Adj. Hull Road and Grimston Bar	211									35	40	40	40	40	16			211						0	0
ST5	York Central	2500									45	107	107	107	107	119	119	119	830	119	143	143	143	143	691	979
ST7	Land East of Metcalfe Lane	845										50	90	120	120	120	120	120	740	105					105	0
ST8	Land North of Monks Cross	970								30	70	100	100	100	100	100	100	100	800	100	70				170	0
ST9	Land North of Haxby	735										45	90	90	90	90	90	90	585	90	60				150	0
ST14	Land to West of Wigginton Road	1348										60	60	160	160	160	160	160	920	160	160	108			428	0
ST15	Land to West of Elvington Lane	3339											35	70	105	105	105	140	560	210	210	280	280	280	1260	1519
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22						21											21						0	
ST16	Terrys Extension Site - Terrys Car park (Phase 2)	0																	0						0	0
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	0																	0						0	0
ST17	Nestle South (Phase 1)	279							279										279						0	0
ST17	Nestle South (Phase 2)	425								35	35	35	35	35	35	35	35	22	302						0	123
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158								35	35	35	35	18					158						0	0
ST32	Hungate (Phases 5+) (Blocks D & H)	375									196				179				375						0	0
ST33	Station Yard Wheldarke	150								7	35	35	35	38					150						0	
ST36	Imphal Barracks, Fulford Road	769																100	100	100	100	100	100	100	500	169
Annualised projected Completions for ST Sites						**0**	**0**	**74**	**357**	**159**	**501**	**687**	**812**	**963**	**1116**	**895**	**879**	**1001**	7444	**934**	**743**	**631**	**523**	**523**	3354	2790
4. Projected Housing Completions From Non Allocated Unimplemented Consents																										
Total		**1713**						**483**	**333**	**363**	**250**	**105**	**143**	**36**		**0**	**0**	**0**	1713	**0**	**0**	**0**	**0**	**0**		
5. Projected completions from communal establishments and student accommodation																									0	
Total		**436**						**357**	**26**	**53**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	436	**0**	**0**	**0**	**0**	**0**	0	
																									0	
Supply Trajectory																									0	
Actual Net Completions (2017 to 2022)			1331	451	627	704	654												3767						0	
Projected Completions (all sites)						0	0	1014	910	797	1132	874	1534	999	1116	895	879	1001	11151	934	743	631	523	523	3354	
Windfalls						0	0	0	0	0	199	199	199	199	199	199	199	199	1592	199	199	199	199	199	995	
Actual and Projected Housing Completions (Inc Windfall Allowance)								1014	910	797	1331	1073	1733	1198	1315	1094	1078	1200	12743	1133	942	830	722	722	4349	
Cumulative Completions (Including Windfalls)			1331	1782	2409	3113	3767	4781	5691	6488	7819	8892	10625	11823	13138	14232	15310	16510		17643	18585	19415	20137	20859		
Requirement (790pa plus 32 under supply) 822dpa			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	13152	822	822	822	822	822	4110	
Cumulative Requirement			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152		13974	14796	15618	16440	17262	0	
Over/Under Suppy			**509**	**138**	**-57**	**-175**	**-343**	**-151**	**-63**	**-88**	**421**	**672**	**1583**	**1959**	**2452**	**2724**	**2980**	**3358**		**3669**	**3789**	**3797**	**3697**	**3597**	0	
																									0	
Detailed Trajectory (including 10% Non-Implementation Rate)																									0	
Projected Completions (all sites)			*0*	*0*	*0*	*0*	*0*	*1014*	*910*	*797*	*1132*	*874*	*1534*	*999*	*1116*	*895*	*879*	*1001*	*11151*	*934*	*743*	*631*	*523*	*523*	*3354*	
Projected Completions (all sites) - 10% Non-implementation Rate Applied			0	0	0	0	0	913	819	717	1019	787	1381	899	1004	806	791	901	10035.9	841	669	568	471	471	3018.6	
Windfall Allowance											199	199	199	199	199	199	199	199	1592	199	199	199	199	199	995	
Total Projected Completions (with 10% Non implementation rate applied and windfalls) + Actual completions 2017-2022			1331	451	627	704	654	913	819	717	1218	986	1580	1098	1203	1005	990	1100	15395	1040	868	767	670	670	4013.6	
Cumulative Completions (with 10% non implementation rate applied and windfalls)			1331	1782	2409	3113	3767	4680	5499	6216	7434	8419	9999	11097	12300	13305	14295	15395		16435	17302	18069	18739	19409		
Annual Target (Inclusive of Shortfall)			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	13152	822	822	822	822	822	4110	
Cumulative Annual Requirement (Inclusive of Shortfall)			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152		13974	14796	15618	16440	17262		
Over/Under Supply of Housing (calc = Cumulative completions - cumulative annual target)			**509**	**138**	**-57**	**-175**	**-343**	**-252**	**-255**	**-360**	**36**	**199**	**957**	**1233**	**1614**	**1797**	**1965**	**2243**		**2461**	**2506**	**2451**	**2299**	**2147**		
5 year housng supply																										
5 year requirement (822*5)							4110	4110	4110	4110	4110	4110	4110	4110	4110	4110	4110	4110								
Shortfall to be carried over remainag plan period (Absolute value of H)							343	227	165	0	0	0	0	0	0	0	0	0								
Shortfall within 5 years (5x(G=Remaining Plan Period) (Liverpool)							156	114	92	0	0	0	0	0	0	0	0	0								
20% buffer (0.2*(J+L))							853	845	840	822	822	822	822													
5% buffer (j*.05)														206	206	206	206	206								
Rolling total 5 year requirement (J+L+Buffer)							5119	5068	5042	4932	4932	4932	4932	4316	4316	4316	4316	4316								
Rolling 5 year land supply (Row D)							4652	5319	5598	6085	5871	5876	5396	5338	5002	4764	4444	4014								
Over/Under Supply (with NI applied) against total 5 year requirement (P-0)							-467	251	556	1153	939	944	464	1022	686	449	128	-302								
Land supply in Years (no account for previous oversupply)							4.54	5.25	5.55	6.17	5.95	5.96	5.47	6.18	5.80	5.52	5.15	4.65								
Rolling 5 year requuirement (J=(M orN)-H)										*5292*	*4896*	*4733*	*3975*	*3083*	*2701*	*2519*	*2351*	*2073*								
Land Supply in years inclusive of past oversupply										*5.75*	*6.00*	*6.21*	*6.79*	*8.66*	*9.26*	*9.46*	*9.45*	*9.68*								

CBRE

City of York CIL Draft Charging Schedule Consultation

Technical representation prepared by CBRE UK Ltd jointly on behalf of the following:

- Foss Argo Developments Ltd
- Helmsley Group Ltd

March 2023

Contents

Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by a consortium of two developers ('the consortium'), each with land and property interests in York, to prepare a formal representation document setting out a technical response to the City of York Council ('CYC') Community Infrastructure Levy ('CIL') Draft Charging Schedule ('DCS') consultation 2023 ('the consultation').

2. CBRE's technical representations focus upon the evidence base underpinning the CYC CIL DCS – specifically the City of York CIL Viability Study Final Report ('CIL Viability Study') produced by Porter Planning Economics ('PPE') and dated December 2022.

3. An overarching representation has been prepared by York-based town planning consultancy O'Neill Associates.

The Consortium

4. The consortium consists of the following developers, each with existing land and property interests within York:

   - Foss Argo Developments Ltd
   - Helmsley Group Ltd

The Consultation

5. CYC published the following documents on 13th February 2023:

   - CIL Statement of Representations Procedure ('SORP')
   - CIL Consultation Information Booklet
   - CIL Draft Charging Schedule ('CIL DCS')
   - CIL Viability Study
   - CIL Infrastructure Funding Gap
   - CIL Associated Mapping (for information only)

6. The consultation ran to 27 March 2023.

7. The SORP confirms BCC's intention to submit the CIL DCS for independent examination following the close of the CIL DCS consultation.

The Consortium's Stance

8. The consortium has fundamental concerns regarding:

   a. CYC's proposal to introduce CIL charging on purpose built student housing (usually referred to as purpose built student accommodation or 'PBSA') development within the CIL DCS; and

  b. CYC's proposal to introduce CIL charging on residential dwellings within the City of York in the CIL DCS.

9. It is the consortium's firm view that the introduction of the proposed CIL rates will undermine the viability of new development in an environment where recent long-term construction cost inflation, softened funding investment yields, and increased debt servicing costs have placed increasing pressures on development significantly since mid-2022. This is exacerbated by the limited availability of suitable sites in what represents a highly constrained urban context.

10. In light of above the consortium does not accept the validity and reliability of the published viability evidence base upon which the proposed PBSA and residential charging rates within the CIL DCS relies, and hence the legal compliance of the published CIL DCS with the relevant legislation and guidance.

11. On this basis, the consortium members cannot agree with CYC 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 unavoidably lead to the rejection of the Charging Schedule in accordance with Section 212A(2) of the 2008 Act.

12. Should CYC determine to submit the CIL DCS for examination, in its current form and without rectifying the issues identified in this representation and O'Neill Associates overarching representation, the consortium will be left with no choice but to seek that the Examiner rejects the Charging Schedule via the examination process.

Request to be Heard and Notification Requests

13. It is stated on the consultation page of CYC's 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 CYC's approval of the Charging Schedule.

14. This constitutes the consortium's formal request to be heard at the examination of the CIL DCS, either as a consortium or as independent stakeholder organisation, and to be notified by CYC of the events listed in paragraph 12 above. This notification should be provided to both O'Neill Associates and CBRE, as instructed joint agents.

Matters of Representation

Purpose

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

Significance of Proposed CIL DCS Rates

16. The CIL DCS proposes a significant increase in costs via the introduction of CIL charging on multiple uses for the first time.

17. Notably, the CIL DCS introduces the following new zonal charges:

Development type	CIL rate per sqm
Residential dwellings within the City of York	£200
Residential dwellings within the City of York Local Plan strategic sites ST7, ST8, ST9, ST14 and ST15	£0
Residential dwellings within the remaining City of York Local Plan strategic sites	£100
Sheltered / Retirement accommodation	£100
Extra care accommodation on Brownfield sites	£100
Extra care accommodation on Greenfield sites	£0
Purpose Built Student Housing without an affordable housing contribution	£150
Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution	£50
Convenience[1] retail with up to 450 sqm gross internal area	£100
Comparison[2] retail built outside the City Centre boundary	£100
Comparison retail built inside of the City Centre boundary	£0
All other development	£0

18. These are not incremental changes, but rather represent a fundamental shift to introduce substantial rates of CIL charging across multiple uses both city-wide and on a zonal basis.

19. It is notable that the rates proposed are amongst the highest, if not the highest, across the entirety of Yorkshire and the Humber, even when allowing for indexation since adoption in other Charging Authorities.

CBRE has provided a full schedule of proposed and adopted rates across the region as a comparison within **Enclosure 1**.[1]

20. As a result, such proposals by CYC must necessitate comprehensive, robust, and up-to-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).

Illogical Timing

21. The UK property market is experiencing a highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally over 2022 and which is expected to prevail over the course of 2023. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Development and investment across a wide range of sectors are facing headwinds, which commenced in mid-2022 and continue to prevail during 2023.

22. 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. Throughout 2023, CBRE expect unemployment to rise from its current historically low level. In tandem, job vacancies will decrease. Wage growth will not be able to keep up with inflation until late 2023, eroding consumer purchasing power. We expect a moderate recession to occur in 2023, with GDP falling by 0.9%.

    b. Inflation has been rising relentlessly over the past 18 months and is at its highest for 40 years. Inflation has been driven by a post-COVID surge in demand, which could not be met due to supply bottlenecks. Russia's war in Ukraine has exacerbated supply shortages, pushing energy, food, and other commodity prices even higher. Policy choices, such as China's zero-COVID policy, are slowing down the recovery of supply chains, and raising the costs of imported durable goods. In the UK, inflation has been exacerbated by a weak pound, which has made imports more expensive to the UK consumer.

    c. Increased global supply chain disruption has and will continue to put further upward pressure on energy prices, food prices and construction materials. Significant uncertainty persists around the future path of inflation. Inflation remains stubbornly high in early 2023, with the Consumer Prices Index (CPI) rising by 10.4% in the 12 months to February 2023, up from 10.1% in January. CBRE's base case is that CPI inflation will have peaked in Q4 2022 and fall back in the second half of 2023. Implicit in this forecast is the end of the Ukraine conflict by year end with energy - and non-energy commodity prices falling from their current highs.

    d. Monetary tightening is well underway over fears of second-round effects from wage and price-setting. During 2023, the Bank of England will continue to rise interest rates, which CBRE forecast to peak at around 4.5% and push borrowing costs to the highest levels prior to the financial crisis in

[1] Note: this information was obtained from Planning Resource and is understood to have been correct as at August 2022. The rates presented are not indexed, but represent those rates either proposed (latest) or at the date of adoption of relevant Charging Schedules.

2008. As inflation begins to cool, rates will begin to decrease, declining gradually to a 'new normal' of around 2% from 2026 onwards.

e. Faced with spiraling prices and higher interest rates on loans, businesses and consumers are limiting spending. Consumer confidence has been hit, and retail sales will continue to decline until inflation moderates and consumers restore their purchasing power. Businesses will have to cut costs to preserve margins in a high-inflation environment. This will lead to some job losses and higher unemployment in the first half of 2023.

f. The 10-year gilt yield has risen by almost 200bps since the beginning of 2022 and financial conditions are materially tighter than in Q2 2022. The expectation of future short-term interest rate hikes will continue to push upward on long-term market interest rates until the base rate starts to move down.

g. Inflation and rising interest rates have resulted in an increase in property yields. This ongoing yield shift, which commenced from Q3 2022 has hit values and returns for investors. As the cost of capital, closely related to the interest rates of central banks and therefore to inflation, have risen, valuations have been negatively impacted.

23. Specifically considering the PBSA sector, CBRE's baseline forecast for 2023 is as follows:

a. Overall, the sector continues to be undersupplied but this is highly nuanced, and an understanding of affordability is key. An in-depth understanding of the submarket dynamics is critical.

b. Investment yields have softened in H2 2022 and high inflation and rising interest rates will continue to impact the investment and funding market over 2023 and into 2024, until inflation abates and central banks pivot on interest rates.

c. Overall, the development of new PBSA is slowing due to a combination of factors, and this will carry forward throughout 2023. Specifically, the drivers are as follows:

i. Rising build costs present viability challenges

ii. The pace of the planning system remains a significant barrier to delivery

iii. Rising operational costs will also continue to hinder new development given the negative impact on net rental income.

iv. Development financing is also increasingly expensive and is increasingly difficult to obtain.

24. Specifically considering the residential market, CBRE's baseline forecast for 2023/24 is as follows:

a. The residential market will face challenges in 2023. This will curb activity and result in moderate price falls in the mainstream housing market. Investment into the sector will remain robust but pricing will adjust to reflect some yield expansion. However, this will be partly mitigated by strong rent growth.

b. As home buyers are faced with a more challenging backdrop in 2023, activity in the housing market will reduce. Even so, while we expect sales to fall below their long-run average, the market will avoid a 'cliff-edge' fall in activity.

c. In line with the wider economic slowdown, we expect prices to fall moderately in 2023 and 2024. On balance, we forecast that UK house prices could fall by 3% in 2023, and a further 1% in 2024. But stricter mortgage regulations (since 2014) will somewhat insulate the housing market against large scale distressed sales. The absence of such a 'supply shock' should prevent a significant fall in prices.

d. As a result of the more challenging environment, we expect a smaller potential buyer pool in 2023. This may be compounded by the end of Help to Buy scheme that, on average, has facilitated the sale of 40,000 homes a year since its inception in 2013. Although not everyone using the scheme necessarily needed to, we identified that it's absence could result in a fall of 25,000 new home sales per year going forward.

e. Investment appetite for Build-to-Rent and Co-Living will remain strong. However, pricing will adjust to reflect the higher interest rate environment. The challenging sales market will present opportunities for single-family Build-to-Rent investors. However, high build cost inflation will continue to hamper forward-funding viability in early 2023.

25. CBRE questions the logic and rationale, and efficiency in use of public funds, for introducing a CIL regime at this juncture, given the wider challenges facing development and uncertainty in both the macro-economy and property market.

26. CYC'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 city for PBSA development.

Outdated Evidence

27. The published available evidence to inform the CIL DCS is the CIL Viability Study produced by PPE and dated December 2022.

28. CBRE has reviewed the CIL Viability Study in detail. It is apparent that the input assumptions for PBSA scheme typologies, which are subsequently utilised by PPE in undertaking the viability modelling, analysis, conclusions and recommendations rely substantially upon evidence from Q1-2 2022. Moreover, the input assumptions for residential scheme typologies are base dated as at August 2022.

29. As set out above, and well-documented, have been significant macro-economic headwinds and property market adjustment issues over the period since, as well as substantive ongoing construction cost inflation, which are material considerations that any robust viability evidence base must account for.

30. In addition, the Government is conducting a staged implementation of the Building Safety Act 2022, and has stated that it expects student accommodation to be subject to the regulatory regime under Part Three, which will have implications for the design and construction of new developments.

31. The Government has also recently consulted upon amendments to Approved Document B, which proposes that all new buildings of 30m (circa 10 storeys) or above will require a second separated staircase[2]. The Greater London Authority ('GLA') has pre-empted the Government's conclusions by mandating this requirement for new development in Greater London with immediate effect.

32. The Government is currently considering responses following closure of the consultation on 17 March 2023, but it is widely anticipated that student accommodation will be required to conform to the amendments, which

[2] https://www.gov.uk/government/consultations/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings

is prompting developers and investors to factor second staircases into plans for new development going forward in order that they can meet regulations, and be insurable, investable and deliverable. Specifically, Government states:

"58. Recognising that many schemes are in development, and this change would represent a significant change, we are proposing a very short transition period before implementing the changes.

59. The transition period will allow time for schemes to be completed but should not allow the opportunity for developments to get off the ground ahead of the new requirements coming into effect.

60. We would encourage all developments to prepare for this change now."

33. Based on the impact assessment conducted, the Government has publicly acknowledged that the implications of additional construction costs, and loss of build efficiency, will impact negatively on the financial viability of development and, as a result, is likely to reduce the propensity of higher density schemes to deliver affordable housing as a consequence:

    "65. The costs of a second staircase will also impact the viability of high rise buildings, this is likely to reduce the amount of affordable housing that can be provided by developers."

34. The impact will be that gross to net build efficiency is reduced, meaning lower net lettable floorspace against a higher or equivalent gross internal area (GIA).

35. It does not appear that the CIL Viability Study has accounted for the this or addressed the implications.

36. CBRE has provided further details upon this relating to PBSA use within the 'Technical Deficiencies' sub-section of this representation.

Technical Deficiencies

Purpose Built Student Housing

37. There are a range of detailed technical issues identified, which render the CIL Viability Study as an unsound basis for setting the proposed CIL rates for purpose built student housing, and which the consortium advocate will require rectification prior to CYC proceeding with the CIL DCS as presently published:

    a. **Rents, Yields and Capital Values for PBSA Typologies:**

        i. The CIL Viability Study tests 5no. PBSA typologies ranging from 25 beds to 600 beds. An average gross rental income is applied of £177/week over 47 weeks (annual) based on the 2022-23 academic year. This is drawn from a cross-section of PBSA schemes across the city, which is provided in Appendix C of the document.

        ii. CBRE notes that the adoption of an 'average' gross rental rate of £177/week is represents a cross-section of both private sector operator PBSA schemes and HEI operated student accommodation.

        iii. CBRE does not disagree with the CIL Viability Study's usage of the average gross rental income of £177/week to be applied to private sector (off-campus) development typologies.

        iv. OPEX is deducted at 30% of gross annual rent to generate a net rental income, which is capitalized at an investment yield of 5.0%. This is stated as generating a capital value of £112,300 per room.

v. The CIL Viability Study cites, at para 3.75 that the above capital value is a "*cautious sales value for the sole purpose of this planning viability assessment*".

vi. CBRE notes that this observation is based on evidence obtained from a Cushman & Wakefield report (non-York specific) drawing on data from H1 2022. It therefore does not represent current market conditions.

vii. Analysing York specifically, there are relatively few recent transactions for which information is available. These are as follows and demonstrate a tone of circa 5.5%-6.5% NIY and capital value of circa £90,000-£100,000 per bed:

1. 62 Layerthorpe: comprising 98 beds transacted in 2019 on a forward fund / commit to iQ Student Accommodation for a total capital value of £92,000 per bed.
2. Haxby Road City Residential: comprising 124 beds transacted in 2018 on a stabilized investment basis at a NIY of 6.5%, reflecting £60,000 per bed.
3. Foss Studios: comprising 220 beds transacted in 2017 on a stabilized investment basis at a NIY of 5.7%, reflecting £106,000 per bed.

viii. The above capital values would suggest that the sum of £112,300 per room adopted in the CIL Viability Study actually exceeds transactional evidence available for York in recent years.

ix. CBRE's research places York as 21st in the league of the UK's cities with the highest full-time student populations in 2021/22, with circa 27,000 full-time students. This is relatively low compared to the top five regional cities (Birmingham, Glasgow, Manchester, Nottingham, Leeds), which collectively accounted for 374,000 full time students.

x. On the basis of the above, CBRE ranks York as a Prime Regional location for PBSA and understand that other agents such as JLL and Knight Frank regard the city on an equivalent basis.

xi. As stated earlier in this document, investment yields have softened since Q3 2022 due to wider macro-economic conditions, and continue to trend weaker in a high interest environment. The latest available investment yield sheets now record Prime Regional PBSA yields as follows:

1. JLL Monthly Yield Sheet: PBSA Prime Regional at 5.25% in January 2023 (softening from 5.0% in Q3-4 2022[3].
2. Knight Frank Prime Yield Guide – March 2023: PBSA Prime Regional at 5.0% - 5.25% (softening from 4.75%-5% in Q3 2022)[4].

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[3] Note: this is provided within **Enclosure 2**.
[4] Note: this is provided within **Enclosure 2**.

3. CBRE UK Living Sectors Investment Yields – March 2023: PBSA Prime Regional at 5.0% and trending weaker (softening from 4.75% in Q3 2022)[5].

xii. In summary, three respected agents all report PBSA Prime Regional yields softening to 5.0% - 5.25% at present day. Importantly, these are not development funding yields, but are stabilized investment yields.

xiii. Institutional forward funding has been one of the main delivery routes for financing the development of PBSA schemes in York and elsewhere across the regions, where brought forward by the private sector (i.e. non-University). CBRE's market intelligence is that funding yields are transacting at a discount of circa 25bps in comparison to stabilized investment yields. As a result, if the rates above are adjusted for development funding, this would see yields at 5.25% - 5.5%.

b. **Construction costs**:

i. The construction costs adopted are set out in Table 5.3 on p.49 are cited as being drawn from RICS BCIS. The source data is referenced as being provided in Appendix D. The RICS BCIS cost is cited as £2,112/m^2 (£196/ft^2) and base-dated at Q3 (i.e. Jul.-Sept.) 2022.

ii. Given that circa 6 months has passed since the construction costs were base dated, CBRE has reviewed the RICS BCIS data as published at 11 March 2023. On an equivalent basis the RICS BCIS median cost now stands at £2,166/m^2 (£201/ft^2), which is an increase of 2.6%. The data is provided within **Enclosure 3**.

iii. CBRE comment that the RICS BCIS costs of £2,166/m^2 (£201/ft^2) are extremely low in the context of PBSA developments being brought forward for delivery in regional cities in the current market, and would highlight that RICS BCIS is a significantly lagging indicator due to the time taken for tender data be provided and reporting updated. Hence, in an inflationary environment over 2022 and 2023, it has consistently underestimated construction costs being generated in real-time. Moreover, as mentioned prior, RICS BCIS will not yet account for changes to fire safety guidance (Approved Document Part B).

iv. CBRE notes that the CIL Viability Study also cites in para. 5.10 that additional allowance of 15% of build costs for external site works such as utilities, car parking and landscaping is provided.

v. However, reviewing the example 100-bed typology appraisal in Appendix A confirms that there is an error, whereby the viability appraisals only account for a 10% external works cost, which means that there is an omission in the viability testing of this typology of at least £280,262.50. This is greater than the entirety of the CIL headroom of £223,666, which would significantly alter the conclusions and recommendations of the CIL Viability Study. In essence, if corrected, it would eradicate any headroom at all for CIL on Typology 10a or 10b alongside the proposed Policy 10 AH OSFC payment, and CIL would require reducing to NIL

[5] Note: this is provided within **Enclosure 2**.

for these typologies. As a result, the charging rate of £50/m^2 proposed within the CIL DCS for "*Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution*" would be required to be removed altogether via modification.

vi. In a further apparent error, the 100-bed typology appraisal in Appendix A contains only 8% professional fees, as a cost allowance. However, para. 5.10 states clearly that modelling allows for " *10% of build costs and externals for professional fees associated with the build, including architect fees, planner fees, surveyor fees, and project manager fees*". This means a further cost omission within the viability testing of the PBSA typologies, which will further reduce the viability of this use if reintroduced to the viability appraisals for each PBSA typology.

vii. CBRE has set aside the above points, pending clarification from CYC.

viii. Taking a stand back approach, CBRE's cross-section of market intelligence in the sector is that the current minimum construction cost for developer-led mid-specification PBSA schemes in the regions, equates to circa £85,000 per bed. It is CBRE's direct experience that higher specification schemes, which seek to secure higher rents from students (and which primarily target the international student market) are incurring far higher costs.

ix. In **Table 1** overleaf, CBRE has set out both a comparison between the RICS BCIS median rate costs as at Q3 2022 and March 2023. CBRE considers these costs to be more likely representative of construction to a low-mid specification product, which would achieve a lower than average rental price point in the York market. As the definition in RICS BCiS states it would therefore be more appropriate to reflect student halls of residences (i.e. university-led on campus development), rather than the higher specification product being delivered off-campus by private developers, and those which can secure rents at an average for York (i.e. the £177/week) or above.

x. CBRE notes that the RICS BCIS upper quartile rate (£2,389/m^2 | £222/ft^2) generates a construction cost, when allowing for external works, that is commensurate with the level of costs being seen for mid-market specification PBSA schemes in the regions (at circa £84,500/bed). This is provided for comparison in **Table 1**.

xi. For the reasons set out above, CBRE strongly advocates that the RICS BCIS upper quartile rate should represent the base construction cost for viability testing developer-led (i.e. off campus) PBSA typologies. The median rate simply isn't a realistic cost benchmark to adopt for this purpose in the current market.

Table 1: Comparison Analysis: RICS BCIS Costs Q3 2022 vs. Q1 2023 vs. Minimum Market Rates (CBRE Q1 2023)

RICS BCIS Median Q3 2022			Build			External Works @	10%	Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,112	196	19,288	40,736,256	600	67,894	4,073,626	6,789	44,809,882	74,683	2,323	216
2,112	196	11,251	23,762,112	350	67,892	2,376,211	6,789	26,138,323	74,681	2,323	216
2,112	196	6,429	13,578,048	200	67,890	1,357,805	6,789	14,935,853	74,679	2,323	216
2,112	196	3,215	6,790,080	100	67,901	679,008	6,790	7,469,088	74,691	2,323	216
RICS BCIS Median Q1 2023			**Build**			**External Works @**	**10%**	**Total Costs (Build + Externals)**			
£/m2	**£/ft2**	**GIA (m2)**	**Cost (£)**	**Beds (Typologies)**	**£/Bed**	**Cost (£)**	**£/Bed**	**Cost (£)**	**£/Bed**	**£/m2**	**£/ft2**
2,166	201.2	19,288	41,777,808	600	69,630	4,177,781	6,963	45,955,589	76,593	2,383	221
2,166	201.2	11,251	24,369,666	350	69,628	2,436,967	6,963	26,806,633	76,590	2,383	221
2,166	201.2	6,429	13,925,214	200	69,626	1,392,521	6,963	15,317,735	76,589	2,383	221
2,166	201.2	3,215	6,963,690	100	69,637	696,369	6,964	7,660,059	76,601	2,383	221
RICS BCIS Upper Quartile Q1 2023			**Build**			**External Works @**	**10%**	**Total Costs (Build + Externals)**			
£/m2	**£/ft2**	**GIA (m2)**	**Cost (£)**	**Beds (Typologies)**	**£/Bed**	**Cost (£)**	**£/Bed**	**Cost (£)**	**£/Bed**	**£/m2**	**£/ft2**
2,389	221.9	19,288	46,079,032	600	76,798	4,607,903	7,680	50,686,935	84,478	2,628	244
2,389	221.9	11,251	26,878,639	350	76,796	2,687,864	7,680	29,566,503	84,476	2,628	244
2,389	221.9	6,429	15,358,881	200	76,794	1,535,888	7,679	16,894,769	84,474	2,628	244
2,389	221.9	3,215	7,680,635	100	76,806	768,064	7,681	8,448,699	84,487	2,628	244

Source: RICS BCIS / CBRE Data

c. **Site Areas for Typologies**: It is not clearly stated within the CIL Viability Study as to how the site areas applied for each typology were derived and the evidence used to inform this. Given this is an important basis for setting benchmark land values, CBRE requests that this information is provided by CYC to provided transparency and clarity to stakeholders.

d. **Benchmark Land Value**:

i. The CIL Viability Study includes the adopted BLVs for non-residential uses within Table 5.6 on p.52. However, the document contains no supporting justification or evidence to underwrite the proposed BLVs, which CBRE considers a significant omission.

ii. The CIL Viability Study proposes a BLV of £1.5m/ha (£607,000/acre) as the BLV to apply to PBSA typologies. In order to find justification for this BLV, CBRE has had regard to the earlier Technical Note titled *CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7 ('Policy H7 Technical Note')*, which was produced by PPE and which is dated August 2022. An explanation is provided in paras 20-23.

iii. This is predicated on a logic whereby it is proposed that abandoned or unviable locations and/or dilapidated industrial units will be the typical brownfield sites that will be brought forward for alternative uses, such as PBSA schemes. The transactions drawn upon in Table 4 of the Policy H7 Technical Note, which are cited as comparables, are not relevant to York and it is not stated whether any of the transacted sites were ultimately brought forward for PBSA development.

iv. CBRE is not aware of any abandoned, unviable or dilapidated industrial premises that could be redeveloped for PBSA use. There is presently a limited supply of sites suitable for redevelopment for PBSA uses across the city, which necessitates PBSA development competing with other forms of prospective development including hotels, traditional residential, elderly persons accommodation or offices.

v. CBRE is therefore unclear on the logic behind Table 5.6 in the CIL Viability Study, on p.52. This is replicated below. It sets a substantially lower BLV for PBSA development in comparison to competing uses such as Hotel and Care Home uses (both £2m/ha), supermarket use (£2m/ha) and retail warehouse use (£2m/ha).

Table 5.6 Benchmark land values for non-residential existing uses

Typology	BLV per gross area
1: Town centre office	£1,500,000
2: Business park	£1,000,000
3: Industrial / warehouse	£850,000
4: Small local convenience	£2,000,000
5: Supermarket	£2,000,000
7: Retail warehouse	£2,000,000
8: City Centre retail	£4,000,000
9: Hotel (60 beds)	£2,000,000
10: Student accommodation	£1,500,000
11. Care home (60 bed)	£2,000,000

vi. In addition, CBRE also notes that the CIL Viability Study adopts a BLV for residential typology viability testing of £1.7m/ha for brownfield land in its existing use as 'City centre / extension' land within Table 4.15 on p.47.

vii. The CIL Viability Study does not adequately justify why competing brownfield land uses have been viability tested against a higher BLV and PBSA against a lower BLV. This warrants further explanation by CYC.

viii. The risk is that this overstates the propensity for PBSA developments to acquire land at lower prices than competing uses, and through the proposed CIL rates applied to PBSA, then places them at a disadvantage when seeking to acquire land due to overstating viability and the further additional CIL costs applied.

ix. A rational approach would be for BLVs for this use to be considered by way of market transactional analysis of sites brought forward for PBSA use within the city of York in recent years. CBRE recommends that CYC seek to source and consider such evidence in taking a 'stand back' approach and a York-specific market sense-check.

Results & Re-appraisal

38. The CIL Viability Study sets out the results of viability modelling within Table 7.1 on p.61. This is replicated below for ease.

Table 7.1 Recommended non-residential psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of 50%	33%	25%
1: Town centre office	-£1,034			
2: Business park	-£906			
3: Industrial / warehouse	-£333			
4: Small local convenience	£154	£77	£103	£115
5: Supermarket	-£117			
7: Retail warehouse	£134	£67	£90	£101
8: City Centre retail	-£68			
9: Hotel (60 beds)	-£143			
10a: Student accommodation - 25 bed	£127	£64	£85	£95
10b: Student accommodation - 100 bed	£84	£42	£56	£63
10c: Student accommodation – 200 bed	-£16			
10d: Student accommodation - 350 bed	-£50			
10e: Student accommodation - 600 bed	-£152			
11. Care home (60 bed)	-£937			

39. Whilst the CIL Viability Study only appends a summary viability appraisal for PBSA typology 10b, Table 7.1 clearly demonstrates PPE's headroom analysis concludes that only PBSA typologies 10a and 10b can viably accommodate both any CIL and a 2.5% affordable housing equivalent OSFC contribution per student room as proposed under modifications published under CYC's draft Local Plan Proposed Main Modifications public consultation – specifically via modified Policy H7: Off Campus Purpose Built Student Housing.

40. This is notwithstanding CBRE and the consortium's representations that the conclusions within Table 7.1 and the CIL Viability Study are they themselves outdated and don't reflect deterioration in market conditions since Q3/4 2022.

41. With this in mind, Table 7.1 of the CIL Viability Study shows PBSA typologies 10c – 10e to all fall below the threshold of financial viability. This means they cannot accommodate any CIL, as there is no headroom, but critically these PBSA typologies are also demonstrated as generating negative headroom (shown in red). This means that PPE determine that they are now unable to even partially or fully meet the OSFC costs of Policy H7 whilst remaining financially viable – as they generate negative headroom **before** incurring additional CIL.

42. This directly contradicts Table 6 (replicated below) in the earlier published Technical Note titled *CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7 ('Policy H7 Technical Note')*, which was produced by PPE and which is dated August 2022.

43. The latter document accompanies CYC's draft Local Plan Proposed Main Modifications public consultation – specifically in respect of modified Policy H7: Off Campus Purpose Built Student Housing. The Technical Note, as specifically the conclusions in Table 6, was (and still is) being utilized as the viability evidence base to justify CYC's proposed requirement for off-campus PBSA schemes to provide a 2.5% affordable housing equivalent OSFC contribution per student room. This is replicated below for ease.

Table 6 PBSA scheme viability test at CYC Local Plan full policy and different OSFC rates

Scheme type	Land type	Viability and headroom			
		0% OSFC per student room (0% per Cluster unit)	2.5% OSFC per student room (10% per Cluster unit)	5% OSFC per student room (20% per Cluster unit)	10% OSFC per student room (40% per Cluster unit)
25-bed PBSA	Brownfield	£16,025	£10,276	£4,455	-£7,662
100-bed PBSA	Brownfield	£11,884	£6,151	£417	-£11,732
200-bed PBSA - low density	Brownfield	£11,095	£5,379	-£336	-£12,385
350-bed PBSA	Brownfield	£11,088	£5,386	-£316	-£12,326
600-bed PBSA	Brownfield	£8,794	£3,111	-£2,572	-£14,627

44. The CIL Viability Study now supersedes the earlier Technical Note and clearly demonstrates it is out-of-date. In the intervening period between the Policy H7 Technical Note being produced and the CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

45. Consequently, based on the CIL Viability Study results, there is no longer any evidenced justification for CYC seeking for off-campus PBSA schemes to provide a 2.5% affordable housing equivalent OSFC contribution per student room (particularly in 200+ bed typologies), as there is no longer sufficient 'headroom' demonstrable within the tested PBSA typologies to support this financial contribution.

46. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

47. Further elaboration is provided in PPG Viability (para. 002 ref: 10-002-20190509):

    "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."

48. As clearly set out in both PPG and the RICS Guidance[6], the impact on viability of a CIL, whether proposed or existing, should be considered alongside the full policy requirements of the Plan – this should therefore include the demonstrable viability of PBSA typologies (off-campus) to provide a 2.5% affordable housing equivalent OSFC contribution per student room.

49. 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. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage. PPG Viability is explicit on this point, stating the following in para. 002 ref: 10-002-20190509:

    "Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."

50. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed required of Policy H7 is unsound and requires removal.**

51. Noting this issue, the CIL Viability Study also runs viability testing on PBSA typologies, specifically with the cost of meeting the 2.5% affordable housing equivalent OSFC contribution per student room **removed**, to determine CIL headroom to apply to on-campus PBSA. This is replicated in the following table.

Table 7.2 Recommended on campus student accommodation, psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of		
		50%	33%	25%
10a: Student accommodation - 25 bed	£421	£211	£281	£316
10b: Student accommodation - 100 bed	£374	£187	£249	£281
10c: Student accommodation - 200 bed	£272	£136	£181	£204
10d: Student accommodation - 350 bed	£238	£119	£159	£179
10e: Student accommodation - 600 bed	£135	£68	£90	£101

52. CBRE cannot support the levels of CIL headroom being identified within Table 7.2 above for the PBSA typologies, for the reasons set out earlier within this representation.

53. Firstly, there is an inconsistency in the level of buffer back from the calculated maximum headroom being recommended by PPE. For residential typologies (and proposed CIL rates) a buffer of 60% is advocated by PPE, citing market risk and uncertainty. However, for PBSA typologies only 25%-50% buffer is recommended

[6] RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14

for allowance in proposing the setting of the CIL charging rate at £150/m². CBRE considers this to be irrational and advocates for consistency in the applying of any buffer – which should be at the very least 50% across all typologies.

54. Even taken on basis presented in Table 7.2 above, scheme typologies of 200+beds do not demonstrate sufficient headroom to accommodate the proposed rate of £150/m² for on-campus PBSA development within the CIL DCS.

CBRE Updated Appraisal Modelling – Off-Campus PBSA Development (Private sector-led)

55. Given CBRE's analysis set out above firmly highlights both technical issues with the CIL Viability Study evidence base and that market conditions have deteriorated since its publication, CBRE has run independent viability modelling on PBSA typologies to determine the implications for CIL headroom in the current market.

56. In order to take a comprehensive approach, CBRE has utilised present-day input assumptions for off-campus (developer-led) PBSA development scheme typologies.

57. Firstly, CBRE has set the rental rates to £177/week to represent an average rate across the York market. OPEX is deducted at 30% of the gross annual rent to generate a net rental income. This is consistent with the CIL Viability Study inputs.

58. Secondly, CBRE has capitalised the net rental income at an investment yield of 5.0%. As set out earlier in this representation, most private-sector driven PBSA development has, and is expected to continue to be, institutionally funded. PBSA development funding yields are presently at circa 5.25% - 5.5% for prime regional locations, such as York. CBRE has taken the more optimistic stance of provisionally retaining the rate adopted in the CIL Viability Study, which represents a best case illustrative position as it would be unlikely to be achievable in today's market.

59. Thirdly, CBRE has increased the construction costs to reflect the RICS BCIS upper quartile cost as published at March 2023. This is deemed the most representative benchmark rate for current market construction costs for mid-market specification private-sector led PBSA schemes being brought forward in regional cities.

60. Finally, CBRE has not adjusted the external works and professional fees allowances utilised in the CIL Viability Study modelling – utilising the lower rates in the example appraisal appended to the document, rather than the higher figures referenced in the text. This therefore, again, adopts the most optimistic position absent of clarification from CYC.

61. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. As previously, this should not be taken as an endorsement, but is deemed reasonable and rational for the purposes of comparison – given it is not the responsibility of the consortium to prepare CYC's evidence.

62. Firstly, CBRE has run the appraisals inclusive of the (modified) Policy H7 requirement to provide a 2.5% affordable housing equivalent OSFC contribution per student room. A headroom analysis is provided overleaf. Appraisal summaries are provided within **Enclosure 4**.

Table 2: Headroom Analysis (for CIL) Incorporating Modified Policy H7 OSFC – Developer-led PBSA Development

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	-173	-86	-115	-129
10c	200-bed	-251	-126	-168	-189
10d	350-bed	-276	-138	-184	-207
10e	600-bed	-355	-178	-237	-267

Source: CBRE

63. In summary, the analysis in Table 2 above reiterates that there is no headroom for off-campus developer-led PBSA schemes to provide the affordable OSFC sought via Policy H7 (as modified) and CIL liability.

64. Subsequently, CBRE has removed the cost of the affordable OSFC sought via Policy H7 (as modified), which then solely assesses the propensity of the PBSA typologies to accommodate CIL[7]. A headroom analysis is provided below. Appraisal summaries are provided within **Enclosure 5**.

Table 3: Headroom Analysis (for CIL) Excluding Modified Policy H7 OSFC – Developer-led PBSA Development

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	34	17	22	25
10c	200-bed	-44	-22	-29	-33
10d	350-bed	-68	-34	-45	-51
10e	600-bed	-146	-73	-98	-110

Source: CBRE

65. In summary, even when removing the cost of the affordable OSFC sought via Policy H7 (as modified), the developer led PBSA typologies remain marginal at best. Only typology 10b (100-beds) generates a surplus,

[7] Note: this replicates the methodology used in the CIL Viability Study and should be cross-referenced with the results shown in Table 7.2 from that document, which is used to inform the CIL rates proposed in the CIL DCS.

and this is relatively nominal once allowing for a 50%+ buffer. No other typologies have any headroom available for either the affordable OSFC sought via Policy H7 (as modified) or CIL.

66. It is also important to note that the Table 3 appraisals include a 5.0% funding yield. If adjusted out to 5.25%, a sensitivity test in Table 4 below shows that this eradicates any prospective surplus to be directed either into the affordable OSFC sought via Policy H7 or CIL. Introducing a CIL liability on this typology would therefore risk the setting of the rate being at or beyond the margin of viability.

Table 4: Headroom Analysis (for CIL) Excluding Modified Policy H7 OSFC – Developer-led PBSA Development (Yield)

		Headroom	After Buffer of:		
Typology	PBSA Beds	£/CIL Liable sqm	50%	33%	25%
10b	100-bed	-77	-39	-51	-58

Source: CBRE

67. On the weight of the above (and enclosed) evidence, CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL. The appraisal summary is provided within **Enclosure 6**.

Residential

68. CBRE notes the following observations on the CIL Viability Study:

   a. **City Centre Development**: CBRE notes that whilst York City Centre development generates the highest sales values, which is itself a symptom of supply-side constraints, the costs of development in the city centre are substantially higher than across the rest of the city. Specifically, it is a an archaeological area of importance, in the historic core conservation area, and most of the city centre is also designated high flood risk with all development having to provide a 30% betterment in terms of surface water runoff (usually through attenuation). These factors, and associated costs, do not appear to have been accounted for within the CIL Viability Study.

   b. **Residential Values**:

      i. **Apartment Development**: CBRE has cross-referenced the 'heat mapping' in Figure 3.8 (p.22) of the CIL Viability Study with the commentary in paragraph 3.20 on average sales values. This states that the average sale price for apartments in the City of York (i.e. city-wide) is £5,335/m^2 (£496/ft^2). CBRE notes that the average cited is inconsistent with the heat map, which shows this rate being at the upper end of the price banding (£3,960/m^2 - £5,399/m^2), and focused in a limited geography, with prices recorded in the majority of the city outside the city centre substantially lower (at £3,564/m^2 - £3,960/m^2 or less). This infers that the pricing adopted is only likely to be appropriate for the city centre itself, and that there is in fact evidence that a lower set of sales values should have been adopted in the CIL Viability Study for apartment development outside the city centre. As it stands, the approach adopted is overstating the development value, and hence viability, of apartment development outside the city centre core.

      ii. **Inflation**: Prices have been adopted at £4,200/m^2 for houses and £5,335/m^2 for flats, which is base dated to August 2022. CBRE has cross-checked against the latest data available from the Land Registry House Price Index ('HPI') for January 2023. This confirms that pricing had remained relatively unchanged, rising 0.6% in the period from August 2022. However, this data lags by circa 3 months and residential developers have publicly reported slowing reservation and conversion rates as well as reduced buyer demand and downward pricing pressure (and increased incentivisation) during Q1 2023. CBRE expects this pressure to continue over 2023 and manifest in price decreases, lower transaction volumes and slower sales trajectories in new build development.

   c. **Residential Build Costs**:

      i. **Flatted / Apartment Costs**: The CIL Viability Study adopts an average cost of £1,505/m^2 for the construction of apartments across York. Based on recent experience, CBRE confirm that it is not possible to construct residential apartments within the city (and certainly not the city centre) at this cost rate. It will substantially overstate the financial viability of flatted apartment development typologies.

      ii. **Inflation**: In a consistent manner to pricing, build costs have been rebased to Q3 2022. CBRE has used the RICS BCIS All-in TPI (published on 10 March 2023) to review construction cost inflation in the intervening period, and has sense-checked this against the locally weighted rates. All-in TPI reports that construction cost inflation equated to circa 2.2% between Q3 2022 and Q1 2023. As a result, construction costs have increased ahead of residential property price inflation, which will have a negative impact on scheme viability.

d. **Garages**: The CIL Viability Study includes a single garage cost of £9,000. Information provided to CBRE by volume housebuilders places the cost at in excess of £10,500 per single garage in Q1 2023. As a result, the cost allowance in the CIL Viability Study is considered low.

e. **Other development costs**:

i. **Demolition and land remediation**: the costs appear to be based on a historic Homes England document dating from 2015. CBRE is familiar with the document. However, rates adopted should be indexed to present day to fully reflect the impact of inflation.

ii. **M4(2), M4(3)(A) and M4(3)(B)**: the costs appear to be based on a historic EC Harris report, which dates from 2014. However, rates adopted should be indexed to present day to fully reflect the impact of inflation.

f. Overall, CBRE would advocate a cautious approach is taken by CYC to setting CIL rates in what represents a slowing and, potentially, reversing housing market over the 2023 and 2024 period, particularly if CYC is minded to seek to maintain or increase levels of affordable housing provision as part of the overall housing supply.

Lack of Transparency

69. There is a lack of transparency in the CIL Viability Study that CBRE deems falls short of the requirements and 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[8] and RICS Professional Standards[9], and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.

70. Specifically, only one example appraisal is provided for the PBSA typology (100-bed). This is inadequate and all appraisals for non-residential typologies (notably PBSA) should be issued. Notably, none of the typology appraisals are provided for the proposed CIL charging Zone *"Purpose Built Student Housing without an affordable housing contribution"*.

71. Without this 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 utilized to set proposed CIL rates is not published, available, and cannot be interrogated appropriately.

Failure to Strike an Appropriate Balance

72. In setting CIL rates, BCC must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments. In accordance with CIL Regulation

[8] RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note
[9] RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition

14(1)[10], BCC 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.

73. As set out in PPG[11], Charging Schedules should be consistent with, and support the implementation of, up-to-date relevant plans.

74. 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.

75. As also clearly set out in the RICS Guidance[12], the impact on viability of a 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.

76. Moreover, CBRE concludes that it is illogical and counter-intuitive for CYC to introduce the proposed CIL rates for PBSA use development for the published CIL Viability Study document does not constitute up-to-date appropriate available evidence to underpin the proposed rates within the CIL DCS.

77. As a result, if submitted to PINS for examination in its present form and with the current evidence base, the consortium would strongly contend that the CIL DCS is unsound and should not be endorsed by the Examiner for the above fundamental reasons and further technical deficiencies expanded upon below.

78. If non-compliance could not be rectified via modification(s), the Examiner would be requested to reject the CIL DCS in accordance with Section 212A(2) of the 2008 Act.

[10] CIL Regulations 2010 (as amended)
[11] PPG CIL: Paragraph: 011 Reference ID: 25-011-20190901
[12] RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14

Conclusions and Recommendations

80. The consortium cannot endorse or support the CIL DCS, and its underpinning evidence base in the form of the CIL Viability Study, as presently published.

81. In fact, for the reasons set out in this document and its enclosures, the consortium has fundamental doubts regarding the appropriateness of the timing of this consultation on a new CIL DCS. The consortium also has severe reservations regarding the questionable validity and dependability of the published viability evidence base upon which the proposed new charging rates for PBSA use development within the CIL DCS is reliant, and hence the legal compliance of the published CIL DCS with the relevant legislation and guidance.

82. On this basis, the consortium members cannot agree with CYC 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 unavoidably lead to the rejection of the Charging Schedule in accordance with Section 212A(2) of the 2008 Act.

83. The consortium therefore hopes that this feedback prepared by CBRE, and the accompanying commentary from O'Neill Associates, is useful to CYC in reconsidering whether it is rational, prudent and justified to be proceeding with pursuing adoption of a CIL charging regime under the current circumstances.

84. To rectify the issues identified, the consortium advocate that the CIL rates proposed to apply to PBSA development should be reduced to £0/m^2. CYC should undertake this action via modification to the published CIL DCS.

85. CBRE's evidence demonstrates this modification to the CIL DCS should also be undertaken in tandem with the removal of proposed modifications CYC's to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room on sites brought forward outside of land held by the consortium.

86. Nevertheless, should CYC determine to submit the CIL DCS for examination, in its current form and without rectifying the issues identified in this representation, the consortium 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.

87. Should CYC wish to engage directly with the consortium on the matter, CBRE will be able to facilitate such arrangements.

Enclosures

Enclosure 1: Schedule of Proposed & Adopted CIL Rates in Yorkshire & Humber Region

Local Authority	CIL status	Date	Residential Charges	Retail/Commercial Charges	Others
Barnsley	Draft Charging Schedule Published	17/10/2016	Four large residential charging zones with rates of £80, £50, £10, and £0 per square metre. Four small residential charging zones with rates of £80, £50, £30, and £0 per square metre.	Retail developments (A1) will be charged £70 per square metre.	No charge for all other uses.
Bradford	**Adopted**	21/03/2017	Four residential development charging zones with rates of £100, £50, £20 and £0 per square metre. No charge for specialist older persons housing.	Two retail warehouse development charging zones with rates of £85 and £0 per square metre. Large scale supermarket developments will be charged £50 per square metre.	No charge for all other uses.
Calderdale	Charging Schedule Submitted	11/01/2019	Six residential housing charging zones with rates of £85, £40, £25, £10, £5 and £0 per square metre. Two residential institutions and care home development charging zones with rates of £360 and £60 per square metre. Hotel developments will be charged at £60 per square metre.	Large convenience retail developments will be charged £45 per square metre. Retail warehouse developments will be charged at £100 per square metre.	All other chargebale uses will be charged £5 per square metre.
East Riding of Yorkshire	Draft Charging Schedule Published	23/01/2017	Five residential development charging zones with rates of £90, £60, £20, £10 and £0 per square metre.	Retail warehouse developments will be charged £75 per square metre.	No charge for all other uses.
Hambleton	**Adopted**	17/03/2015	Private market housing (excluding apartments) will be charged £55 per square metre.	Retail warehouses are to be charged £40 per square metre. Supermarkets are to be charged £90 per square metre.	No charge for all other uses.
Harrogate	**Adopted**	08/07/2020	Small scale residential developments will be charged £50 per square metre. Two charging zones for all other residential developments with rates of £50 and £0 per square metre. Two sheltered housing development charging zones with rates of £60 and £40 per square metre.	Three retail development charging zones for shops with rates of £120, £40 and £0 per square metre. Large supermarket and retail warehouse developments will be charged £120 per square metre. Small supermarkets will be charged £40 per square metre. Distribution developments will be charged £20 per square metre.	No charge for all other uses.
Hull	**Adopted**	23/01/2018	Two residential housing development charging zones with rates of £60 and £0 per square metre. Residential apartment developments will be charged £0 per square metre.	Large scale supermarket developments will be charged £50 per square metre. Small scale supermarket developments will be charged £5 per square metre. Retail warehouse developments will be charged £25 per square metre.	No charge for all other uses.
Kirklees	Examination Report Published	10/01/2020	Four residential charging zones with rates of £80,£20, £5 and £0 per square metre.	No charge for all commercial or industrial uses.	No charge for all other uses.
Leeds	**Adopted**	12/11/2014	Four residential charging zones with rates of £5, £23, £45 and £90 per square metre.	Two charging zones for supermarket developments with rates of £110 and £175 per square metre. Two charging zones for large comparison retail with rates of £35 and £55 per square metre. City centre offices will be charged £35 per square metre.	Publicly funded or not for profit developments will not be charged CIL. All other uses will be charged £5 per square metre.
Richmondshire	Preliminary Draft Charging Schedule Published	24/10/2016	Three residential development charging zones with rates of £120, £50 and £0 per square metre.	Supermarket developments will be charged £120 per square metre. Retail warehouse developments will be charged £60 per square metre. Neighbourhood convenience retail developments will be charged £60 per square metre.	No charge for all other uses.
Rotherham	**Adopted**	07/12/2016	Three residential charging zones with rates of £55, £30 and £15 per square metre. Retirement living developments will be charged £20 per square metre.	Large scale supermarket developments will be charged £60 per square metre. Large scale retail warehouse and retail park developments will be charged £30 per square metre.	No charge for all other uses.
Ryedale	**Adopted**	14/01/2016	Two residential charging zones with rates of £85 and £45 per square metre. No charge for apartment developments.	Supermarkets will be charged £120 per square metre. Retail warehouses will be charged £60 per square metre.	No charge for all other uses.
Selby	**Adopted**	03/12/2015	Three residential charging zones with rates of £50, £35 and £10 per square metre.	Supermarkets will be charged £110 per square metre. Retail warehouses will be charged £60 per square metre.	No charge for all other uses.
Sheffield	**Adopted**	03/06/2015	Four residential (C3 and C4) charging zones with rates of £80, £50, £30 and £0 per square metre. Hotel developments will be charged £40 per square metre. Student accommodation developments will be charged £30 per square metre.	Large retail developments are to be charged £60 per square metre. Three retail development (A1) charging zones with rates of £60, £30 and £0 per square metre.	No charge for all other uses.
Wakefield	**Adopted**	20/01/2016	Three residential charging zones with rates of £55, £20 and £0 per square metre.	Large supermarkets will be charged £103 per square metre. Retail warehouse developments will be charged £89 per square metre.	No charge for all other uses.

Enclosure 2: Investment Yield Guides – Q1 2023

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

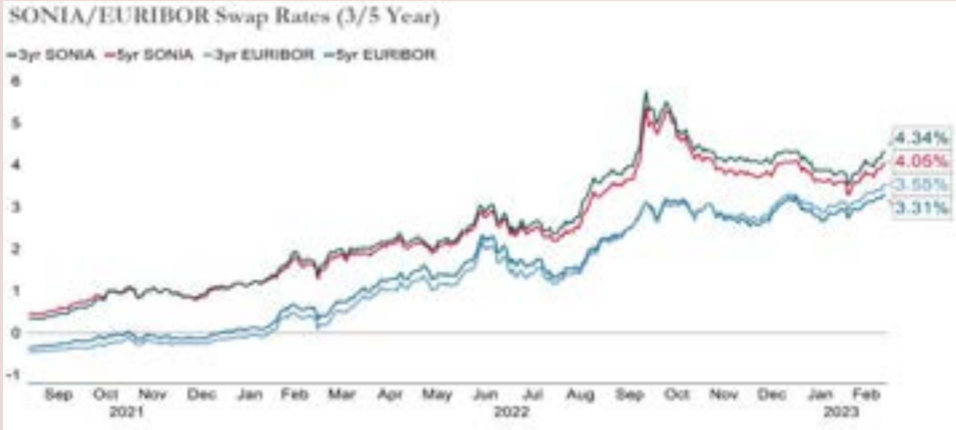
UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond



BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

Did you know

In addition to valuing assets in the main property sectors and having award winning teams in the Healthcare, Student and Automotive sectors, Knight Frank also has expertise in :

- Waste and Energy
- Infrastructure
- Garden Centres
- Film Studios
- Serviced Offices
- Data Centres
- Life Sciences
- Income Strips
- Ground Rents
- Trading assets
- Expert Witness
- IPOs

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We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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JLL SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

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Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

Enclosure 3: RICS BCIS – Rebased to York (March 2023)

BCIS®

£/m2 study

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	**£/m² gross internal floor area**						**Sample**
	Mean	**Lowest**	**Lower quartiles**	**Median**	**Upper quartiles**	**Highest**	
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

Enclosure 4: Developer-led (Off-campus) PBSA Development Typology Appraisals (Including Modified Policy H7 OSFC)

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 4 100 (V3)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(299,818)	
				(299,818)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	**6,339,110**
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				980,832
Other Construction				
Policy H10 AH OSFC Payment	100 un	7,000.00 /un	700,000	
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				927,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(48,110)	
Construction			676,317	
Total Finance Cost				628,207
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	31.48%

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 10 200 (V3)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(925,895)	
				(925,895)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	**12,678,221**
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				2,009,664
Other Construction				
Policy H10 AH OSFC Payment	200 un	7,000.00 /un	1,400,000	
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				1,856,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(182,766)	
Construction			1,715,650	
Total Finance Cost				1,532,884
TOTAL COSTS				**18,716,657**
PROFIT				
				3,743,333

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	27.39%

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
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APPRAISAL SUMMARY — CBRE

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 15 350 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000
NET REALISATION				**39,305,000**	

OUTLAY

ACQUISITION COSTS				
Residualised Price (Negative land)			(1,968,058)	
				(1,968,058)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	**22,184,452**
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				3,498,561
Other Construction				
Policy H10 AH OSFC Payment	350 un	7,000.00 /un	2,450,000	
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				3,248,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(448,777)	
Construction			3,500,754	
Total Finance Cost				3,051,977
TOTAL COSTS				**32,754,164**
PROFIT				
				6,550,836

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	25.12%

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
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APPRAISAL SUMMARY — CBRE

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 20 600 (V3)

Currency in £

REVENUE

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(4,411,795)	
				(4,411,795)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy H10 AH OSFC Payment	600 un	7,000.00 /un	4,200,000	
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				5,574,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(1,203,440)	
Construction			7,335,342	
Total Finance Cost				6,131,902
TOTAL COSTS				**56,149,986**
PROFIT				
				11,230,012

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	22.81%

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 5: Developer-led (Off-campus) PBSA Development Typology Appraisals (Excluding Modified Policy H7 OSFC)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
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APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

APPRAISAL SUMMARY CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			409,788	
				409,788
Stamp Duty			9,989	
Effective Stamp Duty Rate		2.44%		
Agent Fee		1.00%	4,098	
Legal Fee		0.80%	3,278	
				17,366
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				14,687,885
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			92,674	
Construction			1,487,163	
Total Finance Cost				1,579,837
TOTAL COSTS				**18,716,658**
PROFIT				
				3,743,332

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

APPRAISAL SUMMARY CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000

NET REALISATION				**39,305,000**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			379,270	
				379,270
Stamp Duty			8,463	
Effective Stamp Duty Rate		2.23%		
Agent Fee		1.00%	3,793	
Legal Fee		0.80%	3,034	
				15,290
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				25,683,014
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			99,231	
Construction			3,040,130	
Total Finance Cost				3,139,361
TOTAL COSTS				**32,754,167**
PROFIT				
				6,550,833

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY	CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,999

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(376,826)	
				(376,826)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				1,374,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(105,374)	
Construction			6,402,315	
Total Finance Cost				6,296,941
TOTAL COSTS				**56,149,993**
PROFIT				
				11,230,005

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 6: Developer-led (Off-campus) PBSA Development 100-bed Typology Appraisal (Excluding Modified Policy H7 OSFC) with Funding Yield at 5.25% (Sensitivity)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227

NET REALISATION				**10,695,227**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			7,307	
				7,307
Agent Fee		1.00%	73	
Legal Fee		0.80%	58	
				132
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	213,905	
				213,905
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			1,302	
Construction			584,710	
Total Finance Cost				586,012
TOTAL COSTS				**8,912,689**
PROFIT				
				1,782,538

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Local Authority	CIL status	Date	Residential Charges	Retail/Commercial Charges	Others
Barnsley	Draft Charging Schedule Published	17/10/2016	Four large residential charging zones with rates of £80, £50, £10, and £0 per square metre. Four small residential charging zones with rates of £80, £50, £30, and £0 per square metre.	Retail developments (A1) will be charged £70 per square metre.	No charge for all other uses.
Bradford	**Adopted**	21/03/2017	Four residential development charging zones with rates of £100, £50, £20 and £0 per square metre. No charge for specialist older persons housing.	Two retail warehouse development charging zones with rates of £85 and £0 per square metre. Large scale supermarket developments will be charged £50 per square metre.	No charge for all other uses.
Calderdale	Charging Schedule Submitted	11/01/2019	Six residential housing charging zones with rates of £85, £40, £25, £10, £5 and £0 per square metre. Two residential institutions and care home development charging zones with rates of £360 and £60 per square metre. Hotel developments will be charged at £60 per square metre.	Large convenience retail developments will be charged £45 per square metre. Retail warehouse developments will be charged at £100 per square metre.	All other chargebale uses will be charged £5 per square metre.
East Riding of Yorkshire	Draft Charging Schedule Published	23/01/2017	Five residential development charging zones with rates of £90, £60, £20, £10 and £0 per square metre.	Retail warehouse developments will be charged £75 per square metre.	No charge for all other uses.
Hambleton	**Adopted**	17/03/2015	Private market housing (excluding apartments) will be charged £55 per square metre.	Retail warehouses are to be charged £40 per square metre. Supermarkets are to be charged £90 per square metre.	No charge for all other uses.
Harrogate	**Adopted**	08/07/2020	Small scale residential developments will be charged £50 per square metre. Two charging zones for all other residential developments with rates of £50 and £0 per square metre. Two sheltered housing development charging zones with rates of £60 and £40 per square metre.	Three retail development charging zones for shops with rates of £120, £40 and £0 per square metre. Large supermarket and retail warehouse developments will be charged £120 per square metre. Small supermarkets will be charged £40 per square metre. Distribution developments will be charged £20 per square metre.	No charge for all other uses.
Hull	**Adopted**	23/01/2018	Two residential housing development charging zones with rates of £60 and £0 per square metre. Residential apartment developments will be charged £0 per square metre.	Large scale supermarket developments will be charged £50 per square metre. Small scale supermarket developments will be charged £5 per square metre. Retail warehouse developments will be charged £25 per square metre.	No charge for all other uses.
Kirklees	Examination Report Published	10/01/2020	Four residential charging zones with rates of £80,£20, £5 and £0 per square metre.	No charge for all commercial or industrial uses.	No charge for all other uses.
Leeds	**Adopted**	12/11/2014	Four residential charging zones with rates of £5, £23, £45 and £90 per square metre.	Two charging zones for supermarket developments with rates of £110 and £175 per square metre. Two charging zones for large comparison retail with rates of £35 and £55 per square metre. City centre offices will be charged £35 per square metre.	Publicly funded or not for profit developments will not be charged CIL. All other uses will be charged £5 per square metre.
Richmondshire	Preliminary Draft Charging Schedule Published	24/10/2016	Three residential development charging zones with rates of £120, £50 and £0 per square metre.	Supermarket developments will be charged £120 per square metre. Retail warehouse developments will be charged £60 per square metre. Neighbourhood convenience retail developments will be charged £60 per square metre.	No charge for all other uses.
Rotherham	**Adopted**	07/12/2016	Three residential charging zones with rates of £55, £30 and £15 per square metre. Retirement living developments will be charged £20 per square metre.	Large scale supermarket developments will be charged £60 per square metre. Large scale retail warehouse and retail park developments will be charged £30 per square metre.	No charge for all other uses.
Ryedale	**Adopted**	14/01/2016	Two residential charging zones with rates of £85 and £45 per square metre. No charge for apartment developments.	Supermarkets will be charged £120 per square metre. Retail warehouses will be charged £60 per square metre.	No charge for all other uses.
Selby	**Adopted**	03/12/2015	Three residential charging zones with rates of £50, £35 and £10 per square metre.	Supermarkets will be charged £110 per square metre. Retail warehouses will be charged £60 per square metre.	No charge for all other uses.
Sheffield	**Adopted**	03/06/2015	Four residential (C3 and C4) charging zones with rates of £80, £50, £30 and £0 per square metre. Hotel developments will be charged £40 per square metre. Student accommodation developments will be charged £30 per square metre.	Large retail developments are to be charged £60 per square metre. Three retail development (A1) charging zones with rates of £60, £30 and £0 per square metre.	No charge for all other uses.
Wakefield	**Adopted**	20/01/2016	Three residential charging zones with rates of £55, £20 and £0 per square metre.	Large supermarkets will be charged £103 per square metre. Retail warehouse developments will be charged £89 per square metre.	No charge for all other uses.

Prime Yield Guide – March 2023

Knight Frank Intelligence

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Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

Your partners in property.

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SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

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LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

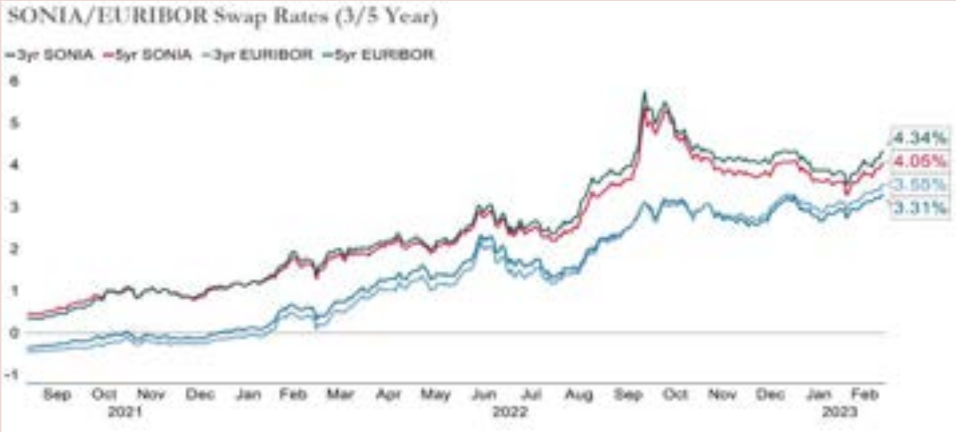
UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond



BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

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KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

Did you know

In addition to valuing assets in the main property sectors and having award winning teams in the Healthcare, Student and Automotive sectors, Knight Frank also has expertise in :

- Waste and Energy
- Infrastructure
- Garden Centres
- Film Studios
- Serviced Offices
- Data Centres
- Life Sciences
- Income Strips
- Ground Rents
- Trading assets
- Expert Witness
- IPOs

KEY CONTACTS

We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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JLL SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

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Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

BCIS®

£/m2 study

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 4 100 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(299,818)	
				(299,818)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	**6,339,110**
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				980,832
Other Construction				
Policy H10 AH OSFC Payment	100 un	7,000.00 /un	700,000	
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				927,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(48,110)	
Construction			676,317	
Total Finance Cost				628,207
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	31.48%

PBSA Typology
100 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 10 200 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(925,895)	
				(925,895)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	**12,678,221**
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				2,009,664
Other Construction				
Policy H10 AH OSFC Payment	200 un	7,000.00 /un	1,400,000	
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				1,856,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(182,766)	
Construction			1,715,650	
Total Finance Cost				1,532,884
TOTAL COSTS				**18,716,657**
PROFIT				
				3,743,333

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	27.39%

PBSA Typology
200 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 15 350 (V3)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation					
Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000
NET REALISATION				**39,305,000**	
OUTLAY					
ACQUISITION COSTS					
Residualised Price (Negative land)			(1,968,058)		
				(1,968,058)	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	**22,184,452**	
Externals		10.00%	2,218,445		
Site Abnormals	1 ac	400,000 /ac	304,000		
Contingency		4.00%	976,116		
				3,498,561	
Other Construction					
Policy H10 AH OSFC Payment	350 un	7,000.00 /un	2,450,000		
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500		
Policy G12 BNG	1 ac	15,000 /ac	11,400		
				3,248,900	
PROFESSIONAL FEES					
Professional Fees		8.00%	1,952,232		
				1,952,232	
DISPOSAL FEES					
Sales Agent Fee		2.00%	786,100		
				786,100	
FINANCE					
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)					
Land			(448,777)		
Construction			3,500,754		
Total Finance Cost				3,051,977	
TOTAL COSTS				**32,754,164**	
PROFIT					
				6,550,836	

Performance Measures	
Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	25.12%

PBSA Typology
350 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 20 600 (V3)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(4,411,795)	
				(4,411,795)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy H10 AH OSFC Payment	600 un	7,000.00 /un	4,200,000	
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				5,574,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(1,203,440)	
Construction			7,335,342	
Total Finance Cost				6,131,902
TOTAL COSTS				**56,149,986**
PROFIT				
				11,230,012

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	22.81%

PBSA Typology
600 Units
Includes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY	CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			409,788	
				409,788
Stamp Duty			9,989	
Effective Stamp Duty Rate		2.44%		
Agent Fee		1.00%	4,098	
Legal Fee		0.80%	3,278	
				17,366
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				14,687,885
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			92,674	
Construction			1,487,163	
Total Finance Cost				1,579,837
TOTAL COSTS				**18,716,658**
PROFIT				
				3,743,332

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY	CBRE

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000

NET REALISATION				**39,305,000**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			379,270	
				379,270
Stamp Duty			8,463	
Effective Stamp Duty Rate		2.23%		
Agent Fee		1.00%	3,793	
Legal Fee		0.80%	3,034	
				15,290
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				25,683,014
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			99,231	
Construction			3,040,130	
Total Finance Cost				3,139,361
TOTAL COSTS				**32,754,167**
PROFIT				
				6,550,833

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**	
OUTLAY					
ACQUISITION COSTS					
Residualised Price (Negative land)			(376,826)		
				(376,826)	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**	
Externals		10.00%	3,803,233		
Site Abnormals	2 ac	400,000 /ac	652,000		
Contingency		4.00%	1,673,422		
				6,128,655	
Other Construction					
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000		
Policy G12 BNG	2 ac	15,000 /ac	24,450		
				1,374,450	
PROFESSIONAL FEES					
Professional Fees		8.00%	3,346,845		
				3,346,845	
DISPOSAL FEES					
Sales Agent Fee		2.00%	1,347,600		
				1,347,600	
FINANCE					
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)					
Land			(105,374)		
Construction			6,402,315		
Total Finance Cost				6,296,941	
TOTAL COSTS				**56,149,993**	
PROFIT					
				11,230,005	

Performance Measures		
Profit on Cost%		20.00%
Profit on GDV%		16.67%
Profit on NDV%		16.67%
Development Yield% (on Rent)		6.00%
Equivalent Yield% (Nominal)		5.00%
Equivalent Yield% (True)		5.16%
IRR% (without Interest)		21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY	CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation					
Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227
NET REALISATION				**10,695,227**	
OUTLAY					
ACQUISITION COSTS					
Residualised Price			7,307		
				7,307	
Agent Fee		1.00%	73		
Legal Fee		0.80%	58		
				132	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Student accommodation - 100 bed typology	28,567	221.90	6,339,110		
Externals		10.00%	633,911		
Site Abnormals	0 ac	400,000 /ac	68,000		
Contingency		4.00%	278,921		
				7,319,942	
Other Construction					
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000		
Policy G12 BNG	0 ac	15,000 /ac	2,550		
				227,550	
PROFESSIONAL FEES					
Professional Fees		8.00%	557,842		
				557,842	
DISPOSAL FEES					
Sales Agent Fee		2.00%	213,905		
				213,905	
FINANCE					
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)					
Land			1,302		
Construction			584,710		
Total Finance Cost				586,012	
TOTAL COSTS				**8,912,689**	
PROFIT					
				1,782,538	

Performance Measures	
Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

APPRAISAL SUMMARY CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #35 –

COMPLETE

Started:	Saturday, February 25, 2023 12:11:54 PM
Last Modified:	Friday, March 17, 2023 4:18:39 PM
Time Spent:	Over a week
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Andrew Hollyer

[redacted]

Contact details:

Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Respondent skipped this question

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

I feel the rationale for zero-rating the strategic sites has not been explained in sufficient detail. I feel there is sufficient headroom to add additional rates to get some CIL from some of the strategic sites.

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

As for 2a, I feel the rationale for zero-rating the strategic sites has not been explained in sufficient detail. I feel there is sufficient headroom to add additional rates to get some CIL from some of the strategic sites.

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

As for 2a, I feel the rationale for zero-rating the strategic sites has not been explained in sufficient detail. I feel there is sufficient headroom to add additional rates to get some CIL from some of the strategic sites.

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

As for 2a, I feel the rationale for zero-rating the strategic sites has not been explained in sufficient detail. I feel there is sufficient headroom to add additional rates to get some CIL from some of the strategic sites.

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for

certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #7 –

COMPLETE

Started:	Monday, February 13, 2023 10:35:50 PM
Last Modified:	Monday, February 13, 2023 10:42:39 PM
Time Spent:	00:06:49
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Shaun Walton

[redacted]

Contact details:

Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

[redacted]

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Respondent skipped this question

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

No - they should all apply equally to Any site - especially the site currently set at 0 contribution!

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

This is wrong. Rates should apply equally regardless of if it makes development unviable!

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

No

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of

development, and if so, why?

No - all should be levied at the same rate.

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #39 –

COMPLETE

Started:	Tuesday, March 21, 2023 10:32:55 AM
Last Modified:	Tuesday, March 21, 2023 10:58:42 AM
Time Spent:	00:25:46
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Stephanie Porter

[redacted]

Contact details:

Organisation (optional)	ICB York Place
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

No

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

N/A

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

It is noted that there is no specific reference to identify health infrastructure in the schedule.

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Its noted that health effectively is at zero CIL rates.

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

no

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

no

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Non hospital based health services in York are struggling to keep pace with residential and care home developments in York. We would want to work with the council and developers to ensure that a proportionate response is agreed and funded through the planning mechanisms to reflect the pressure on health. If all the developments go ahead in the Local Development Plan, the city will require a minimum of 4000m2 additional non hospital health provision. We currently plan this without land costs at £6000 - £7000 per square meter. We'd like to work with City Planners to ensure there is sufficient provision in the city to support the residential growth in its totality, but also the additional impact of over 65/over 75s and over 85s in the city who need more health support. All this information is within the estates strategy which we are happy to share with partners.

[redacted]

From: [redacted]
Sent: 24 March 2023 18:32
To: [redacted]
Cc: localplan@york.gov.uk
Subject: NHS York Place response to LDP and CiL consultation
Attachments: LDP and CIL consultation response NHS York Place Primary Care 24 Mar 23.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good evening

As a formal response to the current consultation which concludes on 27 March I've prepared the attached summary of key developments for Primary Care.

This will form the basis of practical opportunities for health in the community setting to engage in upcoming discussions. I've steered away from overtly referencing the population health aspects of our City profile and I am aware that hospital colleagues are considering their own response.

I look forward to our future discussions.

[redacted]

[redacted]

Humber and North Yorkshire Health and Care Partnership
Web: www.humberandnorthyorkshire.org.uk

Humber and North Yorkshire
Health and Care Partnership

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Humber and North Yorkshire
Health and Care Partnership

NHS
Humber and
North Yorkshire
Integrated Care Board (ICB)

NHS York Health & Care Partnership
West Offices
Station Rise
York
Y01 6GA

Our ref:

24 March 2023

[redacted]
Corporate Director of Place

[redacted]

Email: [redacted]

Web: www.humberandnorthyorkshire.org.uk

Dear [redacted]

Response to Local Development Plan changes and Community Infrastructure Levy

Thank you for the opportunity to respond to your consultation on the documents which underpin the refreshed Local Development Plan (LDP) including the introduction of the Community Infrastructure Levy (CIL). Health input into the process is being managed via the York Health and Social Care Partnership Board, but I also wanted to take the opportunity to support some of the estates-based work for non-hospital provided services which has previously been shared with colleagues at City of York Council (CYC).

We have 5 Primary Care Commissioning Groups (PCNs), which co-ordinate the activities of the 11 General Practices covered by NHS York Health and Care Partnership. The last practice list size review, September 2022, showed our practices had a registered population of approximated 250,000 patients, some of our practices who are registered and are covered by East Riding Council.

PCN	General Practice	Registered Population
Priory Medical Group	Priory Medical Group	57,298
West Outer & North East	Haxby Group Practice	33,344
West Outer & North East	Old School Medical Practice	7,556
West Outer & North East	Front Street Surgery	7,953
York City Centre	Dalton Terrace Surgery	8,968
York City Centre	Unity Health	19,491
York City Centre	Jorvik Gillygate Medical Practice	24,613
York East	Pocklington Group Practice	18,150
York East	MyHealth	19,329

York East	Elvington Medical Practice	7,241
York Medical Group	York Medical Group	44,080

Over the past decade, we have been supporting practices to expand incrementally to respond to small scale residential developments, with only one new surgery, Unity at Kimberlow Hill in response to the University requiring the practice to relocate to facilitate their redevelopment plans.

The ability to expand existing sites is now very limited and capacity to respond to the projected population growth outlined in the LDP will need a City wide, partnership co-ordinated approach, including a shared responsibility to funding support to ensure that we can offer our residents appropriate health services.

Broadly speaking the LDP projects residential growth up to 2032 of around 40,000 new residents and we know that there are likely to be additional growth against current numbers for those over 65/over 75 and over 85 years of age which evidence confirms, require greater health support.

General approaches to increasing capacity
The Vale of York Clinical Commissioning Group, which preceded the ICB commissioned Shared Agenda to develop a Primary Care Estates strategy, which was supported by NHS Property Services and CYC. This was completed in December 2020 and at that time concluded that the impact of the LDP was a requirement for an additional 54 *clinical rooms*, excluding what would be required for support space and associated non-clinical activity space.

We can also use a standard primary care space calculator, which for 40,000 patients (in a single site) would generate the need for 5,000m^2 Gross Internal Area.

What these approaches don't do, is review what a specific area of residential and care home growth would need, by way of reference to existing facilities, which may include consolidation of some service, but it’s a good general indicator.

Excluding the cost of land, new build project costs are current £6000 - £7,000 per m^2 and refurbishment costs are at around £3000 per m^2.

Individual Schemes Examples

Monkgate Health Centre - Together with NHS Property Services and CYC leads we have been exploring the option of replacing Monkgate Health Centre, ideally situated for city centre access and near areas with high inequalities – we have a scheme developed and costed but it has paused currently due to identified land and in turn funding options. We have explored opportunities to build on the council owned car park adjacent and also a phased refurbishment of the existing property. We'd welcome refreshed discussion in response to the LDP & CIL on how we could deliver this scheme.

A costed schedule of accommodation for a new build and refurbishment has previously been shared with CYC.

Burnholme Primary Care Centre - We have long established plans and a business case for a new build at Burnholme. Discussions stalled around the sale value of the CYC owned land, but the plans are in place and are available for review. The business case is also about to commence its NHS review and approval process.

Haxby Health Centre - as an existing NHS Property Services owned site with expansion land, we have commenced worked on a costed option appraisal given the proposals to develop in Haxby and Huntington we are working up proposals with Haxby group at Huntington and with Priory Medical Group at Victoria Way. This would be an ideal time to think about how the LDP and CIL plan into these proposals.

Schemes 'South of A64' - Preliminary work has been undertaken to understand the impact in Bishopthorpe; Copmanthorpe and Elvington. We'd be particularly keen to work with CYC on the Elvington proposals given the scale of the proposed development; the lack of capacity at existing sites and the reference in the LDP for the site at ST15/MM3.52 to health.

York Central – health colleagues worked extensively with Homes England on the specific health requirements for this site, and we'd like to continue that engagement, as its clear the impact of the housing proposals cannot be accommodated via existing primary care services. We have high level costed options to support this and again would value a discussion on how this might be understood and where appropriate, reflected in the developer obligations.

These are some of the schemes which we are developing, there are others, including what the City partners might require in the future from shared facilities at Askham Bar and we continue to engage on individual planning applications, seeking to secure Section 106 contributions to mitigate the impact on individual practices, but the accumulation of planning approvals without any meaningful contributions has left Primary Care health infrastructure very fragile in York and with few opportunities to respond to the growth planned without appropriate mitigation via developers and support from the Council in the strategic planning of services for citizens.

Conclusion

The Infrastructure Funding Gap and the Infrastructure Delivery Plan (2018) for City of York identify a funding gap of £5.6m for health which appears to have been calculated from 2 costed health infrastructure needs and are the only examples that were identified that require developer contributions as a funding source.

j) **Additional GP provision to address cumulative impact of increase in population**	Expansion of existing surgeries, branch surgeries, extended opening or alternative services.	No specific schemes identified	3.5	Ongoing	• Yorkshire and Humber NHS Commissioning Board	• Public Sector funding • Private investment • Potential developer contributions (S106 on large sites)	1,800 patients per GP 2014 viability study estimates provision at £250/unit (HW5)
k) **Additional Dentist to address cumulative impact of increase in population.**	Expansion of existing facilities, new facilities, extended opening or alternative services.	No specific schemes identified	2.1	Ongoing	• Yorkshire and Humber NHS Commissioning Board	• Private investment • Potential developer contributions (S106 on large sites)	2014 viability study estimates provision at £150/unit (HW5)

The consultation on CIL excludes health as a named beneficiary and whilst we acknowledge that the viability of each site needs to be maintained, we would seek an integrated approach to ensure that our non-hospital based services are supported and that the impact of residential housing growth is mitigated in a planned and sustained way to best serve our residents. Given the land values in York, we also need specific support to ensure health is considered and in some cases prioritised so that viable schemes can be developed.

We welcome the series of meeting now in place, which include our Acute sector colleagues who will be making their own submission as part of the LDP and CIL consultation.

I look forward to your response, and of course, I am happy to share any of the detailed option appraisal work on the individual schemes along with the primary care estates strategy already forwarded.

Yours sincerely

[redacted]

Assistant Director Primary Care
NHS York Place

Copied to

[redacted]

Strategic Planning Policy Team localplan@york.gov.uk

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W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #41 –

COMPLETE

Started: Wednesday, March 22, 2023 5:38:49 PM
Last Modified: Friday, March 24, 2023 12:51:46 PM
Time Spent: Over a day
IP Address: [redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Andrew Morrison

[redacted]

Contact details:

Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Respondent skipped this question

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Respondent skipped this question

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

The Community Infrastructure Levy (CIL) Infrastructure Funding Gap Assessment (December 2022) references Paragraph 20 of the National Planning Policy Framework (2021) - 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: (a) housing (including affordable housing), employment, retail, leisure and other commercial development; (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); (c) community facilities (such as health, education and cultural infrastructure); and (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation' Yet in section 3 the Infrastructure Funding Requirements there is no reference to any funding requirements for cultural infrastructure. The statement accompanying table 1 'indicates the full level of funding required for infrastructure within the authority, other funding streams may also contribute. The table simply shows items to which CIL could contribute and where there is as yet no other confirmed funding to fully cover their costs.' This would suggest that the Local Authority believes that there is no funding gap for cultural infrastructure within the City of York or that the City of York Council does not believe that CIL payments should be used for such a purpose which is at odds with NPPF guidance as quoted by the council themselves. Clearly the former is not correct as although York has a very vibrant and thriving independent cultural sector on which the city's visitor economy is predominantly based, the city's Culture Strategy (2020-2025) 'York's Creative Future' approved by the Council Executive has a key outcome to 'secure new funding to support culture'. The Community Infrastructure Levy is a key component in enhancing the cultural infrastructure in the city which will allow the Draft Local Plan to deliver its ambitions with regards to cultural provision and cultural wellbeing. We would strongly encourage the Council to include within the CIL Evidence Base and Infrastructure Funding Gap an assessment of the needs of the city's Cultural Infrastructure alongside the other forms of infrastructure that is covered. This would allow the Council to effectively consider how it can utilise the Community Infrastructure Levy to support Culture as one of the key infrastructure elements of the future of York.

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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #51 –

COMPLETE

Started:	Monday, March 27, 2023 4:14:53 PM
Last Modified:	Monday, March 27, 2023 4:18:43 PM
Time Spent:	00:03:50
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

[redacted]

Contact details:

Organisation (optional)	WNY Chamber of Commerce
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Comments as per uploaded file

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Comments as per uploaded file

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Comments as per uploaded file

Q12

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Comments as per uploaded file

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5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Comments as per uploaded file

Page 4: Your response

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Comments included in uploaded file

Q18

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Comments included in uploaded file

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Comments included in uploaded file

Q22

9a. Do you have any other comments on the CIL evidence base?

Comments included in uploaded file

West & North Yorkshire Chamber of Commerce

WEST & NORTH YORKSHIRE CHAMBER
DEVERE HOUSE, VICAR LANE,
LITTLE GERMANY, BRADFORD, BD1 5AH
T +44 (0) 1274 772777
E info@wnychamber.co.uk
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The York property forum on behalf of the York & North Yorkshire Chamber of Commerce makes representations on the draft community infrastructure levy. We recognise that new property development should pay its fair share of infrastructure needed so that the City and its residents benefit from the fruits of new development. However we are very concerned at the scale of the charges proposed.

We know that others in the property sector are making more detailed representations. We will confine ourselves to more broad brush concerns, but would add our voice to those from others.

The CIL is proposed at a time of considerable uncertainty in terms of both the economy, and central government's changes to the developers contributions regime proposed by the Levelling Up and Regeneration Bill. At the time of writing the government has published its consultation on The Infrastructure Levy, and inflation was expected to be falling but instead has increased to 10.4% (up from 10.1%) and interest rates have risen for 4.0% to 4.25%. This wider economic picture of rising costs has fed through to rapidly increasing construction costs. Barbour ABI, the market leading provider of construction project information, reported that "Price rises were at record levels over summer 2022, with many goods seeing 25 per cent annual inflation. This has now dropped closer to 15 per cent, but some products still hover well above 20 per cent and insulation products have recently jumped to 50 per cent".

Against this uncertain economic background, the government has decided to delay the full introduction of its proposed new Infrastructure Levy by up to 10 years due to uncertain of impact on the delivery of development. These same uncertainties exist with the current CIL system.

The York draft charging schedule envisages charges on Brownfield development which are significantly higher than any authority nearby in particular Harrogate, which enjoys many of the same economic & house price advantages as York. Whilst we appreciate more detailed viability work has been undertaken we struggle to understand how it can be feasible for these significantly higher charges to work . These higher charges could well act to deter developers from entering the York market and so run counter to the city's recently Published York 2032 10 year strategy to promote economic growth.

We are particularly concerned about the £200 levy proposed for residential development. The Residential CIL rate must be considered in the context of the acknowledged poor delivery of housing in the City over a long run period. The Councils own data, demonstrates that in the 10 years 2013/13 to 2021/22, house completion rates fell below the OAH of 790 in 7 of those years. However, the Council's housing completion data includes student accommodation. If student accommodation is excluded, housing completions fell below the OAHN for 9 of the 10 years.

Furthermore, the Council's Housing trajectory set out in supporting evidence to the Local Plan Examination, shows that a cumulative undersupply of housing will persist until 2023/24 – i.e. 7 years into the Plan period.

In this context of long-term undersupply of housing, the imperative is clearly to implement the NPPF requirement to significantly boost the supply of housing. Against this background, the proposed £200 psm rate for housing, the highest rate in the Yorkshire region, seems clearly anomalous and could seriously impede the delivery of housing so desperately required to make good more than a decade of undersupply.

The Policy refers to consultation with the sector back in 2016; but there has been nothing done since then. the world is very different to how it was in 2016! Very disingenuously the document suggests that the industry did not respond after 2016, but so far as we're aware no attempt was made by the council to seek the sectors views and we were waiting for the council.

Brownfield land is typically significantly more expensive to develop with costs of demolition, land remediation, archaeology etc. this is well established yet CYC propose a higher charge than levied on greenfield which we find difficult to comprehend. This preference for greenfield sites runs counter to national policy and all principles of sustainable land use.

A very high CIL charge will likely result in reduced supply of S106 contributions for affordable housing as CIL is deductible from a viability assessment which many more brownfield housing sites will use in future.

So the scale of the levy sought is likely to result in less development overall and in particular less of one of categories of property most needed in York.

The *CIL Infrastructure Funding Gap Assessment (IFGA)* and *Consultation Information Booklet (CIB)* documents issued with the Draft Charging Schedule set out to identify the cost of infrastructure required to support new development and where it is to be spent. However, there is a lack of clarity between the documents. For example, the IFGA identifies a cost of £47.3 million required for "Education". However, section 10 of the CIB, states that Infrastructure for the purposes of CIL spend "can" include transport, flood defences, schools, hospitals and other health and social care facilities.
This provides no certainty or clarity, for example, for residential developers as to whether they will be paying CIL and a Section 106 contribution for education; flood alleviation; or health facilities.
The Charging Schedule therefore needs to state clearly what the CIL will be spent on so that developers can make a proper assessment of whether the CIL and S106 costs on a scheme be viable or whether necessary development will be inhibited.

Yours sincerely

[redacted]

Head of Business Representation

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #44 –

COMPLETE

Started:	Friday, March 24, 2023 3:27:17 PM
Last Modified:	Friday, March 24, 2023 3:30:40 PM
Time Spent:	00:03:23
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Owen Turner

[redacted]

Contact details:

Organisation (optional)	United by Design / Guild of Media Arts / SPACE York CIC / Kaizen Arts CIC
Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

No

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

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Respondent skipped this question

Q14

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Respondent skipped this question

Page 4: Your response

Q16

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Respondent skipped this question

Q18

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development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #45 –

COMPLETE

Started:	Sunday, March 26, 2023 3:45:24 PM
Last Modified:	Sunday, March 26, 2023 3:55:52 PM
Time Spent:	00:10:28
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Robert Powell

[redacted]

Contact details:

Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

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Q8

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Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Respondent skipped this question

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of

development, and if so, why?

Yes, but in rare and carefully considered circumstances only.

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

The current CIL consultation provides the Council with the opportunity to a) deal with certain planning policy inconsistencies and b) to include CIL as an important tool in addressing the city's gaps in cultural provision and infrastructure. Please see attached PDF file in 9.b.

'Regarding Cultural Provision as a Vital Part of part of CIL'

[redacted]

The current CIL consultation provides the Council with the opportunity to a) deal with certain planning policy inconsistencies and b) to include CIL as an important tool in addressing the city's gaps in cultural provision and infrastructure.

Cultural wellbeing is identified as one of the twelve core planning principles underpinning both plan-making and decision-making in the National Planning Policy Framework.

The Community Infrastructure Levy (CIL) Infrastructure Funding Gap Assessment (December 2022) furthermore references Paragraph 20 of the National Planning Policy Framework (2021) - ‘Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: (a) housing (including affordable housing), employment, retail, leisure and other commercial development; (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); (c) **community facilities (such as health, education and cultural infrastructure**); and (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation’

Yet in section 3 of ‘Infrastructure Funding Requirements’ there is **no reference to any funding requirements for cultural infrastructure.** The statement accompanying table 1 ‘indicates the full level of funding required for infrastructure within the authority, other funding streams may also contribute. The table simply shows items to which CIL could contribute and where there is as yet no other confirmed funding to fully cover their costs.’

This would suggest that the Local Authority believes that there is **no funding gap for cultural infrastructure** within the City of York or that the City of York Council **does not believe that CIL payments should applied to culture,** which is at odds with NPPF guidance as quoted by the council themselves.

Yet, as **York's Culture Strategy** ('York's Creative Future 2020-25') makes clear, this is emphatically not the case, as one of its key outcomes is to **'secure new funding to support culture' to fill the current gap.**

Furthermore, **Local Plan Policy D3 - Cultural Provision** makes it clear that 'development proposals will be supported where they are designed to sustain, enhance, and add value to the special qualities and significance of **York’s cultural character, assets, capacity, activities, and opportunities for access'**. It goes on to state: ' Development should deliver a multi-functional public realm comprising streets and spaces that can accommodate a range of appropriate arts and cultural uses and activities both now and in the future, providing animation, vitality and inclusion. Major development schemes and significant schemes at whatever scale should also enable the delivery of permanent and temporary public arts, promoting a multi-disciplinary approach to commissioning artists in the design process itself as part of design and masterplanning teams. **Facilities and resources, including funding, for arts and cultural activity both within and beyond the development period...will also be supported.**

The current CIL consultation provides the Council with the opportunity to deal with these policy inconsistencies and address the city's gaps in cultural provision and infrastructure.

Given the recognised importance of diverse and accessible cultural infrastructure to York's future, I strongly recommend that the Council include within the CIL Evidence Base and Infrastructure Funding Gap an assessment of the needs of the city’s Cultural Infrastructure alongside the other forms of infrastructure that is covered.

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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #30 –

INCOMPLETE

Started:	Friday, March 03, 2023 10:13:49 AM
Last Modified:	Monday, March 13, 2023 1:55:46 PM
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IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Neil Jones

[redacted]

Contact details:

Organisation (optional)	British Sugar
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Yes - Please refer to submitted Rapleys submitted letter of represenattions

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Respondent skipped this question

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

[redacted]

From: [redacted]
Sent: 27 March 2023 11:57
To: [redacted]
Cc:
Subject: CIL consultation - Rapleys Representations on behalf of British Sugar
Attachments: Letter to [redacted] 27.03.2023 - signed.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

[redacted]

Further to our recent correspondence, please find enclosed our representations on behalf of British Sugar.
I will be grateful if you can confirm receipt.
Kind regards

[redacted]

BA (Hons) DipTP MRTPI AssocRICS
Consultant - Town Planning
Planning

[redacted]

***IMPORTANT**: From 1ST April 2023 Energy Performance Certificate (EPC) legislation changes significantly for non-domestic properties. Follow this link for more information*

Rapleys LLP
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RAPLEYS

[redacted]
Principal Strategic Planning Policy Officer
Strategic Planning Policy Team
City of York Council
West Offices
Station Rise
York
YO1 6GA

By email only to localplan@york.gov.uk

Our ref: NJ/1119/114/3
Date: 27 March 2023

Dear [redacted]

Re: City of York Council – Community Infrastructure Levy (CIL) Consultation 2023 – Representations on Behalf of British Sugar

We write on behalf of our client, British Sugar Plc, to submit representations to the above CIL consultation. Please therefore find enclosed with this letter our formal representations.

By way of background, British Sugar is the owner of the Former British Sugar site (the Site), Boroughbridge Road, York. The British Sugar site forms the substantial part of site ST1 (British Sugar / Manor School) in the draft Local Plan. The British Sugar site and Manor School Site, together, are identified within draft Policy SS6 to deliver approximately 1,200 dwellings as part of a residential led mixed use development, incorporating significant community and neighbourhood facilities.

British Sugar has worked with City of York Council (CYC) since the closure of the former British Sugar site in 2007 to progress its sustainable redevelopment for residential led mixed uses. British Sugar has secured outline and full planning permissions (see below) to enable the residential led mixed use development of the site and has recently commenced ground works on site.

- Outline planning permission (ref 15/00524/OUTM, Appeal Ref 3177821) for up to 1,100 residential units and associated community uses
- Full planning permission (ref 20/00774/FULM) for engineering works, remediation and reclamation of the Site
- Full planning permission (ref 17/01072/FUL) for the construction of access roads at Boroughbridge Road and Millfield Lane and across the Former Manor School site

British Sugar remains committed to the delivery of the redevelopment of the Site and continues to work closely with Officers at City of York Council accordingly.

We trust that these representations will be taken into account in the further preparation of the draft CIL charging schedule. We wish to be notified of future updates to CIL by the Council and wish to participate in the CIL examination. We also reserve the right to provide further information, including supporting viability evidence, at or in advance of the CIL Examination.

Yours sincerely,

[redacted]

[redacted]
BA (Hons)DipTP MRTPI AssocRICS
Consultant - Town Planning
[redacted]

City of York Community Infrastructure Levy Consultation Feb / Mar 2023

Representations on Behalf of British Sugar March 2023

The following representations are submitted by Rapleys on behalf of British Sugar and are provided as responses to the specific questions set out in the Council's CIL Consultation Response Form.

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule.

Do you have any comments on the content of the CIL Viability Study?

Response 1a:

1. Para 1.2 of the CIL Viability Study refers to the previous Local Plan and CIL viability testing undertaken by Peter Brett Associates 2017 and Porter PE in April 2018, and subsequent updates prepared for the local plan examination hearings. As acknowledged in para 1.2 of the Viability Study, these assessments focussed on viability testing the impacts of the draft Local Plan (rather than being prepared specifically for the purpose of informing a CIL tariff). Therefore, these assessments cannot be taken as robust evidence for the purpose of demonstrating the viability or otherwise of the proposed CIL tariffs.

2. It is important to note that Rapleys, on behalf of British Sugar, has previously made representations to the Peter Brett Associates 2017 assessment (in Rapleys Local Plan Reg 18 representations dated October 2017) which made it clear that British Sugar had signficant concerns in relation to the assessment evidence base, and that British Sugar was therefore unable to confirm any of the inputs or assumptions that may have been used in the cited site specific assessment. British Sugar did not therefore accept that the document provided a correct approach to valuation of the site, but rather, based on our detailed knowledge of the site, the conclusions and viability results shown in respect of the British Sugar site were not considered to be correct.

3. These concerns on the viability evidence base for the draft Local Plan in respect of the British Sugar site were reiterated within Rapleys Hearing Statements for the draft Local Plan examination process. In particular, Rapleys Phase 2 Hearing Statement for Matter 6 – Infrastructure Requirements, Delivery and Development Viability (Ref HS/P2/M6/IR/6) set out that *'with specific reference to the viability and delivery of the British Sugar site, there are extant planning permissions informed by a bespoke site-specific viability assessment which demonstrate that the assumptions adopted by the Council in the Plan viability testing for this particular site are not accurate, particularly in respect of site preparation costs'.*

4. Therefore, it is clear that prior evidence on viability was prepared not for the purposes of CIL assessment, but rather, to inform Local Plan viability. Moreover, Rapleys on behalf of British Sugar has documented in previous representations its concerns as to the accuracy of these Local Plan viability assessments with regard to the findings for the British Sugar site.

5. This is important, as it is understood that the British Sugar site, unlike other strategic sites, has not been specifically assessed, in terms of viability assessment, within the CIL Viability Study. Rather, as explained at Para 4.5 of the Viability Study, strategic sites are tested, *'except for where they have an agreed planning application.'* It is our understanding, based on discussions with Officers undertaken as part of the preparation of these representations, that the British Sugar site was not therefore specifically tested within the Viability Study on

the basis that it benefits from an existing planning permission for residential led development (and therefore officers have assumed that as a pre-CIL permission, this development will not be subject to the proposed CIL tariff).

6. However, Section 6 of the Viability Study (Residential Viability Testing Results) then provides the viability results of the 'typologies' and the tested Strategic Sites, to identify the financial ability, or otherwise, of particular types of development, or Strategic Sites, to pay a CIL charge. However, the British Sugar site is not specifically tested in any of these strategic site assessments. Nor does it fit within any of the listed typologies assessed (the largest brownfield site typology being '140 dwellings'). In this respect there is no typology or site-specific assessment of the British Sugar site undertaken for the purposes of the CIL Viability Study.

7. Notwithstanding the above, para 6.22 of the Viability Study concludes that *'there is scope of setting a residential CIL charge on all strategic sites in the emerging Local Plan. After allowing a healthy financial buffer in the headroom, CIL could be comfortably set at around £100 psm on a number of strategic sites, without threatening delivery of these tested sites'.* However, as demonstrated in the preceding paragraphs, there is no site specific assessment of the British Sugar site in the CIL Viability Assessment that would support this conclusion for the British Sugar site, and as also identified above, previous viability assessments prepared for the draft Local Plan cannot be relied on as evidence for the CIL tariff, in particular given the serious concerns raised in respect of these previous viability assessment by Rapleys in the course of the draft Local Plan consultation process

8. At Section 4 of the CIL Viability Study, Porter Economics set out the Tested Viability Assumptions adopted to carry out their typology testing. It is acknowledged in the report that *'It is not always possible to get a perfect fit between a site, the site profile and cost/revenue categories for every site likely to come forward within the CYC area. So, in line with national guidance, a best-fit approach is used by testing typologies that reflect allocated sites within the emerging Local Plan and typical windfall sites, based on generic development assumptions relevant to the local area'.*

9. In fact, for the British Sugar site, it is possible to consider the specific viability constraints affecting the site as they were considered in detail during the Public Inquiry for the outline permission and are set out in the Viability Review Mechanism within the s.106 Agreement that accompanies that permission. One of the primary viability considerations relevant to the British Sugar Site is the cost of remediation and site preparation costs. These are identified as the Master Developer Works in the s.106 at £54,999,132. These costs date back to 2017 and would need to be subject to build cost inflation to current date. Based on a site area of 39.83 hectares, the Master Developer Works equate to £1,308,846 per gross hectare or £2,134,230 based on the net developable area of 25.77 hectares (these are unindexed costs).

10. However, at para 4.46 of the CIL Viability Study, Porter Economics have adopted a generic site costs rate of £400,000 per net developable hectare for their typology testing. It is understood that on the basis that there is no site-specific assessment of the British Sugar Strategic Site in the CIL Viability Study, it is this generic site cost rate that has been applied. It is evident therefore that adopting the actual Master Developer Costs would erode any 'Headroom per CIL Liable SQM' that may have been assumed for the British Sugar site within the Council's evidence.

11. Para 6.22 of the Viability Study acknowledges that *'there should be exceptions for several major sites since the CIL rate could potentially place these large strategic sites at risk of*

non-delivery, and potentially undermine the emerging Local Plan. Also, these sites are already expected to support infrastructure investments that benefit the City through site specific s106 contributions.' These same justifications for exception apply wholeheartedly to the British Sugar site (ST1). The viability position for the British Sugar site is reflected in the bespoke viability review mechanism included within the s106 agreement associated with the approved outline planning permission for the development. This viability position reflects the commitment at the site to deliver significant social infrastructure that benefits the City through s106 contributions. In particular, the s106 agreement confirms that commitment, and contributions, for the delivery of the following social infrastructure, will be provided by the development:

- 2 x on site pre-schools
- 1 x on site primary school
- On site community / sports hall
- Community management organisation
- Secondary education contributions
- Offsite sport pitch improvements
- Local and strategic highways and infrastructure improvements

12. In summary therefore it is considered that the approach in the CIL viability study in respect of the British Sugar site is not a logical one, nor is it evidenced based, for the following reasons:

- The British Sugar site has not been specifically assessed within the CIL viability study, unlike other strategic sites.
- The site-specific viability assessments of the British Sugar site that have been undertaken for the Council previously (by Peter Brett and Porter Economics) were done primarily for the purposes of informing the draft Local Plan, rather than the proposed CIL charging schedule. Rapleys has documented the serious concerns with the robustness and accuracy of these assessments in their previous representations to the draft Local Plan.
- The justification given for not undertaking any site-specific viability assessment of the British Sugar site within the CIL Viability Study is that the site benefits from existing planning permissions (and therefore we understand that Officers have assumed that given these pre-CIL permissions, this scheme will not be CIL liable).
- Whilst it is accepted that there are arrangements in place for pre-CIL permissions, there remains the potential that amendments to the exiting permissions, or indeed fresh permissions, become necessary to ensure the further implementation and completion of the development at the British Sugar site. These permissions could become CIL liable.
- Despite not including any site specific assessment of the British Sugar site, the CIL Viability Study then fails to include it within the list of sites that where an exception is made. Rather, it is by default included with the strategic sites which would attract a CIL liability of £100 psm. However, there is no evidence contained within the CIL viability study to support this approach. Indeed as demonstrated in these representations, the

evidence on site preparation costs at the British Sugar site identifies that there would be no headroom to provide for CIL.

- Moreover, the justification for the identified 'exception' strategic sites in the charging schedule applies directly to the British Sugar site. Specifically, it is a large strategic site where the CIL rate could have an adverse impact on delivery and is a site that is supporting significant social infrastructure to the benefit of the City via a package of s106 obligations and contributions. These reasons for exception are therefore clearly applicable to the British Sugar site.

13. In this respect, it is considered that there is clear justification for the inclusion of the British Sugar Strategic Site (ST1) within the list of 'exception sites' that includes other strategic sites which are identified as having a £0 per sqm recommended charge in Table 8.1 of the Viability Study. The British Sugar site ST1 should therefore be included within this list of 'exception sites'.

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

1. No. As set out in our response to Q1 above, there is no site-specific CIL viability evidence prepared in respect of the British Sugar strategic site ST1. The Council's reasoning for this is that the site benefits from an existing planning permission.

2. However as currently drafted, the Draft Charging Schedule does not include site ST1 in the list of 'excluded' strategic sites, and therefore, should it become necessary to secure a new outline or full permission for the development of the ST1 site in future, it would be included with other strategic sites deemed capable of funding a £100psm rate for new residential floorspace within the Draft Charging Schedule, despite there being no relevant CIL viability assessment evidence to support or justify this position.

3. The British Sugar site will provide significant social infrastructure, and the specific viability arrangements associated with the delivery of the site (including this extensive social infrastructure) is reflected in the bespoke viability mechanisms included within the s106 obligations for the approved planning permission (Ref 15/00524/OUTM).

4. In this respect, it is considered that there is clear justification for the inclusion of the British Sugar Strategic Site (ST1) within the list of 'exception sites' that includes other strategic sites identified as having a £0 per square m. charge in the Draft Charging Schedule.

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

1. No. See response to Question 1a and 2a above.

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

1. Yes – see responses to Questions 1a, 2a above.

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

1. Yes – see responses to Questions 1a and 2 above.

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

1. We support the proposed agreement of project specific payment schedules for sites with overall CIL liabilities of £500,000 or more.

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations.

Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

1. N/A

8a. Do you have any other comments on the draft CIL Charging Schedule?

1. No

9a. Do you have any other comments on the CIL evidence base?

1. The Viability Study 2022 refers at para 1.2 to previous viability assessment work undertaken on behalf of the Council. As set out in our response to Question 1 above, this information was prepared for the purpose of informing the draft Local Plan, and not specifically prepared for the purposes of informing the CIL Charging Schedule. In particular, reference is made to the 'City of York Local Plan Viability Update Addendum' (Ref HS/P2/M6/IR/1b App 2). This document was prepared on behalf of the Council during the Local Plan Examination and included an assessment of the impact of changes to the draft Local Plan that had taken place since the publication of the Porter 2018 sites, assessing the strategic sites (including British Sugar). It is noted that this document was prepared for the purposes of the Local Plan rather than the CIL consultation. In addition, consistent with Rapleys previous representations to the Local Plan viability evidence base (cited in our response to question 1a above) it is not accepted that this document provides a correct approach to valuation of the British Sugar site, but rather, based on our detailed knowledge of the site, the conclusions and viability results shown in respect of the British Sugar site are not considered to be accurate. For this reason, this Local Plan evidence base material cannot be relied upon for the purposes of preparing the draft CIL Charging Schedule.

Letter to [redacted] NJ 27.03.2023

Final Audit Report 2023-03-27

Created:	2023-03-27
By:	[redacted]
Status:	Signed
Transaction ID:	CBJCHBCAABAAVoRJ8rjBZ93ZP-zJTuSmDW7NDXFRDWtz

"Letter to [redacted] NJ 27.03.2023" History

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Signer [redacted]
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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #49 –

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Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

M J Harrison

[redacted]

Contact details:

Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Haxby Town Council and Wigginton Parish Council are working on a joint Neighbourhood Plan. The SS11/ST9 development is entirely within Haxby, but many of its impacts will also be felt in Wigginton, e.g., the Health Centre and the Moor Lane/The Village junction are in Wigginton. In the event of the Neighbourhood Plan being implemented, would all of the 25% of the Community Infrastructure Levy be paid to Haxby Town Council, with Wigginton expenditure being funded out of City of York Council's 75%, or would the 25% levy be apportioned between Haxby Town Council and Wigginton Parish Council? The question is hypothetical at present, with the proposed nil rate CIL for SS11/ST9, since 25% of zero is still zero, but the outcome of the independent examination could result in different rates to those in the draft schedule.

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

The CIL Consultation Information Booklet states: 'The sites which are zero rated are those where there are higher on-site requirements...' These are not detailed but a greenfield site such as SS11/ST9 would have low on-site requirements.

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

The CIL Consultation Information Booklet states: 'The sites which are zero rated are those where there are higher on-site requirements...' These are not detailed but a greenfield site such as SS11/ST9 would have low on-site requirements.

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #29 –

COMPLETE

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IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Lorraine Frankland

[redacted]

Contact details:

Organisation (optional)	Huntington Parish Council
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

At their sub-committee planning meeting on 01/03/2023, the Councillors raised the following: There were some concerns that; it would appear the proposed CIL being applied to ST8 and all the other areas shown in Red on the attached maps would result in these communities receiving no developers contribution. It was Agreed that; HPC would ask for some clarity on this matter and if this was indeed the case then a contribution for £10 per M2 would be preferred to the proposed £0 per M2

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

There were some concerns that; it would appear the proposed CIL being applied to ST8 and all the other areas shown in Red on the attached maps would result in these communities receiving no developers contribution. It was Agreed that; HPC would ask for some clarity on this matter and if this was indeed the case then a contribution for £10 per M2 would be preferred to the proposed £0 per M2

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

If developers are paying £0 then there will be Instslments

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #27 –

COMPLETE

Started:	Tuesday, February 28, 2023 3:46:31 PM
Last Modified:	Tuesday, February 28, 2023 3:50:39 PM
Time Spent:	00:04:08
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Andy Dearden

[redacted]

Contact details:

Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Respondent skipped this question

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Given the low proportion of the infrastructure need that will be covered by CIL, I would argue for higher rates.

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

I do not understand why extra care homes should be encouraged on greenfield sites, but discouraged on brownfield sites. That seems to run against the general preference for housing development on brownfield.

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of

development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES   DATA TRENDS   INDIVIDUAL RESPONSES

All Pages –

Respondent #6 –

COMPLETE

Started:	Monday, February 13, 2023 8:12:41 PM
Last Modified:	Monday, February 13, 2023 8:16:30 PM
Time Spent:	00:03:48
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Dr Roger Pierce

[redacted]

Contact details:

Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Respondent skipped this question

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Yes

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Yes

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Too much wriggle room

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

No. Should be based upon development costs

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Sensible

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Charities

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #37 –

COMPLETE

Started:	Monday, March 20, 2023 4:04:55 PM
Last Modified:	Monday, March 20, 2023 4:24:58 PM
Time Spent:	00:20:02
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Christopher Bailey

[redacted]

Contact details:

Organisation (optional)	Guild of Media Arts
Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Table 1 fails to include culture infrastructure - that is to say provision that would either create opportunities for the presentation and consumption of culture, or for provision that would enable partiopation in creative activities. This omission is in contradiction to the culture strategy York's Creative Future, and the aims of York UNESCO Creative Cityof Media Arts, both endorsed by the council.

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Respondent skipped this question

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for

certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

in the light of its omission of culture from the CIL documents the coundil might want to consider the opportunities to attract funding for cultural resources from the Arts Council and elsewhere

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #20 –

COMPLETE

Started:	Thursday, February 23, 2023 11:12:17 AM
Last Modified:	Thursday, February 23, 2023 11:44:08 AM
Time Spent:	00:31:50
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Doreen Marsh

[redacted]

Contact details:

Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

All good points but surely each site is different and requires assessment prior to developing/approval? For example, a new housing site of say 5 houses adjacent to an already approved site of 100 houses will not have a significant impact on community resources as th3 larger site will have already mitigated for school places, post boxes, shops etc.

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Well not really. Each new site proposal will be different and require assessment, thus making each CIL different in value. How can we then have a set table?

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

No. Some sites will require more CIL than others depending upon their location and what's in the immediate area.

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

I can't see how the council can lay down set rates when each site will be different.

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Yes. Each site should be assessed separately. In principle CIL should be supported but applied on a case by case basis. Hence a definite rate cannot be set.

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

All CIL should be paid up front.

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Each proposed development should be assessed separately therefore there'll be a sliding scale of charges. Relief then isn't an issue.

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #55 –

COMPLETE

Started:	Monday, March 27, 2023 10:20:00 AM
Last Modified:	Monday, March 27, 2023 6:10:35 PM
Time Spent:	07:50:35
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Sharon Stoltz

[redacted]

Contact details:

Organisation (optional)	City of York Council
Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

No

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

yes

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

yes

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

No

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

No

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

No

Q22

9a. Do you have any other comments on the CIL evidence base?

Yes, please see attached files in relation to the CIL Infrastructure Funding Gap document.

Public Health

City of York Council
West Offices
Station Rise
York
YO1 6GA

27th March 2023

Dear [redacted]

I am writing as Director of Public Health to provide comments on the proposed Community Infrastructure Levy. I welcome the introduction of the levy as a way of ensuring a fair and transparent process to the allocation of monies from developers to support the infrastructure that our residents need.

However, I do have some concerns specifically about the CIL Infrastructure Funding Gap document. This document states that the funding gap for health services is £5.6 million. To put this in context, this is in comparison to £47.3 million for education, £31 million for parking, £45.5 million for green infrastructure, and so on. I am not clear on how the amount of £5.6million has been generated, and intuitively this does not feel adequate. We know that our health system is currently stretched, with no NHS Dentists in York being able to accommodate new patients, and GP surgeries operating at above capacity. With a Local Plan proposing an additional 40,000 residents by 2032 it is likely that there will be a need for new premises across primary, secondary and community care. Whilst there will be joint funding required by the NHS, the amount in the consultation documents does not feel adequate.

The Health and Wellbeing Board has a statutory duty to produce a Pharmaceutical Needs Assessment, which ascertains whether there is sufficient pharmacy provision within the city. It occurs to me that we do not have a similar requirement, and so have never done, a similar exercise for primary care. So whilst the amount of £5.6 million does not feel adequate to me, and is backed up by what my colleagues in the NHS are telling me in their attached consultation responses, there is actually no evidence base to back this up.

I would be keen for my team to work with you in order to carry this work out, so that we can develop an evidence base in terms of the gaps in

[redacted]

need currently around primary care, and what this would look like with an additional 40,000 residents in the areas identified in the Local Plan. This way we can be certain that we have a strong evidence base for what we are asking developers to contribute towards and know that we are having an impact where it is required by our residents.

Yours sincerely

[redacted]

Humber and North Yorkshire Health and Care Partnership

NHS Humber and North Yorkshire Integrated Care Board (ICB)

NHS York Health & Care Partnership
West Offices
Station Rise
York
Y01 6GA

Our ref:

24 March 2023

[redacted]

[redacted]
RNID typetalk: prefix-18001

[redacted]

[redacted]

Response to Local Development Plan changes and Community Infrastructure Levy

Thank you for the opportunity to respond to your consultation on the documents which underpin the refreshed Local Development Plan (LDP) including the introduction of the Community Infrastructure Levy (CIL). Health input into the process is being managed via the York Health and Social Care Partnership Board, but I also wanted to take the opportunity to support some of the estates-based work for nonhospital provided services which has previously been shared with colleagues at City of York Council (CYC).

We have 5 Primary Care Commissioning Groups (PCNs), which co-ordinate the activities of the 11 General Practices covered by NHS York Health and Care Partnership. The last practice list size review, September 2022, showed our practices had a registered population of approximated 250,000 patients, some of our practices who are registered and are covered by East Riding Council.

PCN	General Practice	Registered Population
Priory Medical Group	Priory Medical Group	57,298
West Outer & North East	Haxby Group Practice	33,344
West Outer & North East	Old School Medical Practice	7,556
West Outer & North East	Front Street Surgery	7,953

York City Centre	Dalton Terrace Surgery	8,968
York City Centre	Unity Health	19,491
York City Centre	Jorvik Gillygate Medical Practice	24,613
York East	Pocklington Group Practice	18,150
York East	MyHealth	19,329
York East	Elvington Medical Practice	7,241
York Medical Group	York Medical Group	44,080

Over the past decade, we have been supporting practices to expand incrementally to respond to small scale residential developments, with only one new surgery, Unity at Kimberlow Hill in response to the University requiring the practice to relocate to facilitate their redevelopment plans.

The ability to expand existing sites is now very limited and capacity to respond to the projected population growth outlined in the LDP will need a City wide, partnership coordinated approach, including a shared responsibility to funding support to ensure that we can offer our residents appropriate health services.

Broadly speaking the LDP projects residential growth up to 2032 of around 40,000 new residents and we know that there are likely to be additional growth against current numbers for those over 65/over 75 and over 85 years of age which evidence confirms, require greater health support.

General approaches to increasing capacity
The Vale of York Clinical Commissioning Group, which preceded the ICB commissioned Shared Agenda to develop a Primary Care Estates strategy, which was supported by NHS Property Services and CYC. This was completed in December 2020 and at that time concluded that the impact of the LDP was a requirement for an additional 54 *clinical rooms*, excluding what would be required for support space and associated non-clinical activity space.

We can also use a standard primary care space calculator, which for 40,000 patients (in a single site) would generate the need for 5,000m^2 Gross Internal Area.

What these approaches don't do, is review what a specific area of residential and care home growth would need, by way of reference to existing facilities, which may include consolidation of some service, but it’s a good general indicator.

Excluding the cost of land, new build project costs are current £6000 - £7,000 per m^2 and refurbishment costs are at around £3000 per m^2.

Individual Schemes Examples

Monkgate Health Centre - Together with NHS Property Services and CYC leads we have been exploring the option of replacing Monkgate Health Centre, ideally situated for city centre access and near areas with high inequalities – we have a scheme developed and costed but it has paused currently due to identified land and in turn funding options. We have explored opportunities to build on the council owned car park adjacent and also a phased refurbishment of the existing property. We'd welcome refreshed discussion in response to the LDP & CIL on how we could deliver this scheme.

A costed schedule of accommodation for a new build and refurbishment has previously been shared with CYC.

Burnholme Primary Care Centre - We have long established plans and a business case for a new build at Burnholme. Discussions stalled around the sale value of the CYC owned land, but the plans are in place and are available for review. The business case is also about to commence its NHS review and approval process.

Haxby Health Centre - as an existing NHS Property Services owned site with expansion land, we have commenced worked on a costed option appraisal given the proposals to develop in Haxby and Huntington we are working up proposals with Haxby group at Huntington and with Priory Medical Group at Victoria Way. This would be an ideal time to think about how the LDP and CIL plan into these proposals.

Schemes 'South of A64' - Preliminary work has been undertaken to understand the impact in Bishopthorpe; Copmanthorpe and Elvington. We'd be particularly keen to work with CYC on the Elvington proposals given the scale of the proposed development; the lack of capacity at existing sites and the reference in the LDP for the site at ST15/MM3.52 to health.

York Central – health colleagues worked extensively with Homes England on the specific health requirements for this site, and we'd like to continue that engagement, as its clear the impact of the housing proposals cannot be accommodated via existing primary care services. We have high level costed options to support this and again would value a discussion on how this might be understood and where appropriate, reflected in the developer obligations.

These are some of the schemes which we are developing, there are others, including what the City partners might require in the future from shared facilities at Askham Bar and we continue to engage on individual planning applications, seeking to secure Section 106 contributions to mitigate the impact on individual practices, but the accumulation of planning approvals without any meaningful contributions has left Primary Care health infrastructure very fragile in York and with few opportunities to respond to the growth planned without appropriate mitigation via developers and support from the Council in the strategic planning of services for citizens.

Conclusion

The Infrastructure Funding Gap and the Infrastructure Delivery Plan (2018) for City of York identify a funding gap of £5.6m for health which appears to have been calculated from 2 costed health infrastructure needs and are the only examples that were identified that require developer contributions as a funding source.

j) **Additional GP provision to address cumulative impact of increase in population**	Expansion of existing surgeries, branch surgeries, extended opening or alternative services.	No specific schemes identified	3.5	Ongoing	• Yorkshire and Humber NHS Commissioning Board	• Public Sector funding • Private investment • Potential developer contributions (S106 on large sites)	1,800 patients per GP 2014 viability study estimates provision at £250/unit (HW5)
k) **Additional Dentist to address cumulative impact of increase in population.**	Expansion of existing facilities, new facilities, extended opening or alternative services.	No specific schemes identified	2.1	Ongoing	• Yorkshire and Humber NHS Commissioning Board	• Private investment • Potential developer contributions (S106 on large sites)	2014 viability study estimates provision at £150/unit (HW5)

The consultation on CIL excludes health as a named beneficiary and whilst we acknowledge that the viability of each site needs to be maintained, we would seek an integrated approach to ensure that our non-hospital based services are supported and that the impact of residential housing growth is mitigated in a planned and sustained way to best serve our residents. Given the land values in York, we also need specific support to ensure health is considered and in some cases prioritised so that viable schemes can be developed.

We welcome the series of meeting now in place, which include our Acute sector colleagues who will be making their own submission as part of the LDP and CIL consultation.

I look forward to your response, and of course, I am happy to share any of the detailed option appraisal work on the individual schemes along with the primary care estates strategy already forwarded.

Yours sincerely

[redacted]

Copied to

[redacted]

Nimbuscare Limited, Acomb Garth Community Care Centre, 2 Oak Rise, York, YO24 4LJ

[redacted]

[redacted]

21.3.23

[redacted]

Re; Community Infrastructure Levy Consultation (closing 27.3.23)

Many thanks to you and Sharon Stoltz for sharing the consultation document and for inviting your colleagues to present the emerging York City Local Plan to colleagues at the recent Health and Care Partnership Board.

I wanted to write to express some concerns around the amount being earmarked for the development of health premises in the consultation document. We are faced with a situation where infrastructure in General Practice in the city is becoming a significant concern. There has been very little development over the last decade and we now face a significant increase in population due to the increase in housing proposed by the plan. We are anticipating 10,000 additional dwellings and potential increase in population of 40,000 citizens according to the data presented by colleagues at the partnership meeting.

We find ourselves facing not only an increasing population but also an ageing population and with that comes both increasing medical complexity and increasing health and social care need. This comes in the context of the recent Health and Social Care Act which is encouraging a shift of care into the community and out of Hospital and that in turn will add more pressure onto the community infrastructure. We will, as recent Nimbuscare activity has demonstrated, see increased collaboration between sectors delivered in the community but as you know we are currently delivery some of that from temporary facilities from a council owned car park, which has been earmarked for housing development.

There is no doubt that General Practice in the city of York required significant infrastructure investment if it is to keep up with the demand of the population. This may involve modernising or extending existing buildings but will also require the development of additional new builds. These may take the form of GP practices but will also include community hubs allowing collaborative working along the lines of the Acomb Garth Facility that has recently been developed with NHS Property Services.

I would like to express concern that my GP colleagues have not been engaged in this process and therefore the projected funding shortfall for healthcare seems woefully inadequate and this could pose a risk for future citizens of York especially given our health and social care ambitions are so high. This seems to be brought further into focus when the funding requirements for leisure activities and green infrastructure are 12 times higher than that suggested for healthcare (and this doesn't mean to say I don't recognise the important of these). Furthermore the healthcare funding is across the board including secondary care requirements.

I am not aware that a full primary care estate needs assessment has been carried out recently in light of the proposed local plan and therefore I would like to express concerns that the process by which these figures have been arrived at is flawed. If we had been more involved earlier in the process we could have supported a primary care needs assessment and the offer to do that moving forward is firmly on the table. We recognise this will take time but we feel this is vitally important for the health of the citizens of York – failure to address this could have significant consequences.

Many thanks for taking the time to considering this response and including it in the formal response to the consultation. On behalf of General Practice I pledge commitment to being part of this process moving forward if that is possible.

Yours Sincerely,

[redacted]

Chief Executive and Partner, Haxby Group Practice
Chair, Nimbuscare Ltd
Chair, Trustee Board, Royal College of General Practitioners, UK

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #21 –

COMPLETE

Started: Thursday, February 23, 2023 3:28:54 PM

Last Modified: Thursday, February 23, 2023 3:47:35 PM

Time Spent: 00:18:40

IP Address: [redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Leigh Bell

[redacted]

Contact details:

Address	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Suggesting that a site doesn't have headroom or viability of a CIL is included should not be a get out of jail free card for developers if the project cannot accommodate a CIL financially it is the project that is not viable not the CIL payment

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

They appear reasonable

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

They appear to do this

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

If the imposing of a CIL payment on a project makes it "unviable" this means that the project is not viable not that the CIL is not a viable option. Using viability as an excuse to avoid payment to mitigate projects is not acceptable position. This surely means the project needs to be re thought.

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Seems reasonable, as parts of the development sell then finances become available

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the

Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

No, if the development cant accommodate levy then the build isn't viable

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

The evidence around health infrastructure mitigation is light, there is no gap analysis, capacity understanding or impact assessment of increasing population by additional builds. Primary care needs assessment and capacity analysis, Pharmacy needs assessment and capacity analysis, dentistry capacity analysis are not mentioned. The suggested 30 million on sport and cycling compared to 5.6 million on health care infrastructure does not reflect an accurate picture this needs to be re addressed using the correct health capacity analysis

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #42 –

COMPLETE

Started: Friday, March 24, 2023 1:58:38 PM
Last Modified: Friday, March 24, 2023 2:11:22 PM
Time Spent: 00:12:43
IP Address: [redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Graham Mitchell

[redacted]

Contact details:

Organisation (optional)	Joseph Rowntree Theatre Ltd
Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

No

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

I believe so

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

I believe so

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

No

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

No

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of

development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: (a) housing (including affordable housing), employment, retail, leisure and other commercial development; (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); (c) community facilities (such as health, education and cultural infrastructure); and (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation' Yet in section 3 of 'Infrastructure Funding Requirements' there is no reference to any funding requirements for cultural infrastructure. The statement accompanying table 1 "indicates the full level of funding required for infrastructure within the authority, other funding streams may also contribute. The table simply shows items to which CIL could contribute and where there is as yet no other confirmed funding to fully cover their costs." This would suggest that the Local Authority believes that there is no funding gap for cultural infrastructure within the City of York or that the City of York Council does not believe that CIL payments should be used for such a purpose which is at odds with NPPF guidance as quoted by the council themselves. Clearly the former is not correct as although York has a very vibrant and thriving independent cultural sector on which the city's visitor economy is predominantly based, the city's Culture Strategy (2020-2025) 'York's Creative Future' approved by the Council Executive has a key outcome to 'secure new funding to support culture'. The Community Infrastructure Levy could be a key component in enhancing the cultural infrastructure in the city creating opportunities for the Council to deliver its ambitions set out in the Draft Local Plan with regards to Cultural Provision and Cultural Wellbeing as set out in Policy D3 and other areas. We would strongly encourage the Council to include within the CIL Evidence Base and Infrastructure Funding Gap an assessment of the needs of the city's Cultural Infrastructure alongside the other forms of infrastructure that is covered. This would allow the Council to effectively consider how it can utilise the Community Infrastructure Levy to support Culture as one of the key infrastructure elements of the future of York.

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #4 –

COMPLETE

Started:	Monday, February 13, 2023 4:40:48 PM
Last Modified:	Monday, February 13, 2023 5:06:37 PM
Time Spent:	00:25:48
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Ms Frances Owen

[redacted]

Contact details:

Address	[redacted]
Address 2	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

The main public objection against new development is a lack of additional supporting infrastructure. A CIL is absolutely necessary if York is to expand.

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

In view of the shortfall in CIL receipts, against estimated infrastructure costs, it does not go anywhere far enough. Provision for escalation in line with actual costs and inflation must be built in.

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Not enough.

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Why is CIL not applied to Extracare development on Greenfield land, which if granted, would surely require more infrastructure development?

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

As students do not contribute to Council taxes, HMOs for student occupiers should attract higher CIL rates.

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

What if the original developer goes bust or claims to be unable to pay?

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for

certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Yes, in cases where a certain type of development is absolutely necessary to the functioning of the whole scheme.

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

The setting of these rates is also a way of controlling the amount of permitted development, and the type of development.

Q22

9a. Do you have any other comments on the CIL evidence base?

The astounding sums estimated for supporting infrastructure make it vital to include these in the Long Term Plan.

SIGN UP FREE W

Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #19 –

COMPLETE

Started:	Wednesday, February 22, 2023 2:19:49 PM
Last Modified:	Wednesday, February 22, 2023 2:22:29 PM
Time Spent:	00:02:39
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

David Jobling

[redacted]

Contact details:

Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

It is too long and complex

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Respondent skipped this question

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Respondent skipped this question

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Respondent skipped this question

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Respondent skipped this question

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Respondent skipped this question

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Respondent skipped this question

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Respondent skipped this question

Q22

9a. Do you have any other comments on the CIL evidence base?

Respondent skipped this question

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Community Infrastructure Levy Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages –

Respondent #22 –

COMPLETE

Started:	Thursday, February 23, 2023 7:44:12 PM
Last Modified:	Thursday, February 23, 2023 7:54:20 PM
Time Spent:	00:10:07
IP Address:	[redacted]

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Mark Knowles

[redacted]

Contact details:

Address	[redacted]
City/town	[redacted]
Post code	[redacted]
Email address	[redacted]

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

No

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

No

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

No

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

Yes

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Yes although I do not understand why greenfield care accommodation is at £0.

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

No

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

None of this makes any distinction on any effort built in to developments to provide sustainable transport, unless that is because no private companies care about the future of the planet.

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

I disagree with any payments being more than 18 months, for any amount. No consequence is mentioned for companies exceeding these deadlines either. If houses are built and three years later the developer pays a levy, how will this positiviely impact the people on site who already all have cars because there was no infrastructure or information about it at the time they bought the property?

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for

certain types of development from paying the levy. The Council has not identified any types of development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

I don't particularly see he the need for any more relief no. Unless these sites come with their own advanced, high level sustainable transport and bike facilities design on site.

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

No

Q22

9a. Do you have any other comments on the CIL evidence base?

No