

From: Harriet Westwood [REDACTED]
Sent: 13 August 2025 10:31
To: localplan@york.gov.uk
Cc: Richard Irving
Subject: CIL Statement of Modifications consultation - Representations
Attachments: Cover Letter v2 - For Issue.pdf

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Good morning,

On behalf of our client York Central Limited please find enclosed representations to the CIL Statement of Modifications consultation.

Please find below the information as set out on your website required to be submitted as part of this consultation:

- *Your contact details, including your company or agent (if relevant)*

Richard Irving (copied in) – [REDACTED]
ID Planning, 9 York Place, Leeds, LS1 2DS

- *Whether you agree or object to the proposed modifications and why*

We object to the proposed modifications, please refer to the attached covering letter.

- *Clear reference to the modification number or individual sections of the Viability Study Addendum (June 2025) you are commenting on*

Please refer to the attached covering letter.

- *Confirmation whether you wish to participate in the CIL examination, and details of the modification number on which you wish to be heard*

Yes we wish to participate in the CIL examination, and again please refer to the attached covering letter.

I would be grateful if you could please confirm receipt of this email and if you require anything further at this stage please let us know.

Kind Regards

Harriet

Harriet Westwood BA(Hons) MRTPI

Senior Planner

a: 9 York Place, Leeds, LS1 2DS

w: www.idplanning.co.uk



13th August 2025

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

Dear Sir / Madam,

City of York Community Infrastructure Levy Charging Schedule Modifications Consultation 2025

On behalf of our client York Central Limited we are hereby instructed to submit representations to the City of York Community Infrastructure Levy Draft Charging Schedule Consultation 2025.

York Central is a major strategic development which is allocated for development within the adopted City of York Local Plan (February 2025) under allocation reference ST5. The Local Plan identifies the site as offering a unique opportunity to extend the city centre, with adopted Policy SS4 supporting its development in creating an exemplar mixed use scheme including a world class urban quarter, a new business district, expanded and new cultural and visitor facilities, and residential accommodation and subsequently a new vibrant community. It is the largest regeneration project in the city and one of the largest in the country, delivering up to 2,500 new homes and the new commercial quarter creating around 6,500 jobs and growing York's economy by over £1billion annually.

York Central benefits from an outline planning permission (OPP) (ref: 18/01884/OUTM) and a number of reserved matters permissions, covering the new road, cycle and pedestrian infrastructure (ref: 20/00710/REMM), the extension to the National Railway Museum (ref: 21/02793/REMM), a new public realm referred to as The Square (Reference: 23/01494/REMM), and a new Government Hub for the office of HM Treasury (Reference: 23/02255/REMM).

On this basis, we provide below our comments on the Draft Charging Schedule, as set out in the consultation material.

Draft Charging Schedule

There have been two previous consultations in association with the Charging Schedule and representations have been made to each consultation, both of which seemingly have not been taken into consideration. The previous consultation version of the Schedule (2023) the rate for strategic sites was removed and, unless expressly identified as a zero-rated site, would be subject to the standard rate of £200psqm. As part of this consultation, it is noted that the liability for all other residential development has reduced from £200/sqm to £150/sqm. In terms of relevance to York Central, as part of this consultation one of the modifications is to re-include York Central within the category where a slight discounted liability for residential development is chargeable, at £100/sqm, and has not been included as a zero-rated site.

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CIL Viability Study Addendum June 2025

An Addendum to the Viability Study, prepared by Porter Planning Economics (PPE), has been published as part of the live consultation, with this addendum providing *“an update in sales values and build costs for residential dwellings and student accommodations in the City of York at the current time, and their retested viability results based on updated assumptions”*. It is noted that all other viability assumptions that were tested in the original December 2022 version and updated in the November 2023 Viability Study Addendum update remain the same. The addendum concludes by recommending the reduction in rates for non-strategic residential development from £200/sqm to £150/sqm. It specifically does not mention the York Central development, nor does it include reference to the site within any charging category.

The Viability Study sets out the legislative basis for, and guidance relating to, the development of CIL charging schedules, noting that a *“high-level” assessment is required to show that “the proposed rate or rates would not undermine the deliverability of the plan”*.

The Study recognises that it should *“sample an appropriate range of types of sites across its area” and “take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or Brownfield land”*.

Some strategic sites have been individually tested including sites ST4, ST7, ST8, ST9, ST14, ST15, ST16, ST21, ST33 and ST36. However, it notes that on sites already benefitting from planning permission, testing has not been undertaken, as is the case with York Central.

Despite previous representations, York Central has not been individually tested and no further information or explanation has been given as to why sites with planning permissions should not be tested.

Comments

As previously identified through former representations submitted, the York Central development is the largest and most significant strategic site in York, delivering a substantial number of new homes and delivering the majority of new economic development planned for York during the Local Plan period. Its ongoing viability is, therefore, a significant issue for the now adopted Local Plan in ensuring the benefits from wider development and aspirations of the allocated site and relevant adopted policies are realised.

Whilst it is recognised that the development benefits from a comprehensive planning permission, setting clear parameters, conditions and obligations for its implementation, the development is likely to take 10 to 15 years to be delivered in full, during which time market factors and development needs may change. It is recognised the extant planning permission and any subsequent amendments to the permission under Section 73 of the Town and Country Planning Act (1990) which do not increase the quantum of development is not subject to CIL and this requires noting in the Charging Schedule Modifications for absolute clarity.

In light of the above, it is requested that York Central (ST5) is included within the zero-rated strategic sites unless a site-specific viability assessment is undertaken, as has been the case with other strategic sites, which proves otherwise. York Central Limited would be happy to support this assessment and provide reasonable and proportionate information where

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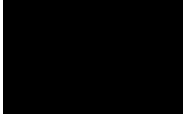
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required and would very much welcome a meeting with relevant policy officers to discuss this matter

I shall be grateful if these representations can be taken into consideration when progressing the Levy for York and we reserve the right to make future comments accordingly.

Yours sincerely



Richard Irving BA (Hons) Dip TP MRTPI
Director

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