

**From:** Jowett, Lucie [REDACTED]  
**Sent:** 15 August 2025 16:26  
**To:** localplan@york.gov.uk  
**Subject:** CIL Statement of Modifications consultation  
**Attachments:** CIL Modifications Consultation.14.08.25.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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 afternoon

Attached are representations to the CIL Modifications Consultation on behalf of our Client Barratt and David Wilson Homes Yorkshire East.

Please could you confirm receipt of this email.

Kind regards

**Lucie Jowett**  
Planning Associate Director



**Stantec UK Limited**



**With every community, we redefine what's possible.**

The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately.

For a list of Stantec's operating entities with associated license and registration information, please visit [stantec.com](https://www.stantec.com).

Disclaimer: The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately. This communication may come from a variety of legal entities within or associated with the Stantec group. For a full list of details for these entities please see our website at [www.stantec.com](http://www.stantec.com). Where business communications relate to the Stantec UK Limited entity, the registered office is Stantec House, Kelburn Court, Birchwood, Warrington, Cheshire WA3 6UT Tel: 01925 845000 and the company is registered in England as registration number 01188070.

14 August 2025

Project/File:

**Planning Policy**

York City Council  
West Offices  
Station Rise  
York  
YO1 6GA

By email only to: [localplan@york.gov.uk](mailto:localplan@york.gov.uk)

Dear Sir/Madam,

**Reference: CIL Statement of Modifications Consultation**

These representations are submitted on behalf of our client, Barratt and David Wilson Homes Yorkshire East, who hold significant land interests in York. Our client has actively participated in all stages of the York Local Plan preparation and Examination.

Our Client is committed to supporting the delivery of sustainable and policy-compliant housing across York and notes the importance of ensuring that the CIL Charging Schedule remains viable and responsive to market conditions.

The following sites promoted by our client are allocated in the adopted Local Plan.

Site Name	Local Plan Allocation	Planning Application Reference	Number of Dwellings
Eastfield Lane Dunnington	H31	20/01626/FULM	83 dwellings
Land North of Haxby	ST9	23/00160/OUTM	700 dwellings
Station Yard Wheldrake	ST33	21/02283/FULM	139 dwellings
Land at Moor Lane Copmanthorpe	H29	19/00602/FULM	75 dwellings
Land West of Wigginton Road	ST14	Not submitted	3,339 dwellings
Land East of Metcalfe Lane	ST7		845 dwellings

## **1.1 Modification 1 – Residential Dwellings within the City of York**

The Modifications seek to amend the CIL rate from £200 to £150 for residential dwellings within the City of York. This is to reflect the revised viability work undertaken.

In principle, we support the proposed reduction in the rate. The CIL Viability Study Addendum (June 2025) provides a clear rationale for this adjustment, based on:

- A decline in residential sales values between June 2023 and March 2025 – a decline in 4.7% for flats and 5.6% for houses.
- An increase in build costs across all categories – ranging from 2.6% to 5.5% over the same period.

These changes have understandably reduced the viability headroom for residential development, and the proposed rate better reflects current market conditions. However, given the volatility in both sales values and build costs, we either recommend further sensitivity testing to assess the resilience of the proposed rate under different market scenarios or an early review of the CIL rate to ensure the rate remains responsive to market shifts and policy changes. This is particularly important in light of ongoing economic uncertainty and inflationary pressures in the construction sector.

Given the requirement has reduced by 25% following submission in recent months, it is clear that any further increases in costs or reductions in sales values will result in the £150 being equally undeliverable and out of date relatively quickly. Given the historic issues of delivery in York and the affordability of homes, CIL needs to ensure that it is not preventing development coming forward and new homes being delivered. On this basis if retained at £150 an early review should be included to ensure that it is deliverable

We also raise the following concerns.

### **1. Incomplete consideration of Green Belt policy impacts**

Having secured the allocation of a number of sites in the recently adopted Local Plan, applications have been submitted and approved on four of these. All four provided policy compliant levels of affordable housing, open space and other developer contributions. This was only deliverable as none of the allocations were required to pay CIL, as retained in the charging schedule. This clearly shows the difficulty in delivering CIL and the other requirements included in those allocations.

The Local plan defined the Green Belt for the first time, excluding large areas for new homes. The remainder of the land outside of the existing built up areas was however identified as Green Belt. York's historic under delivery of homes has been as a result of no Local plan and insufficient homes within the

**Reference:** CIL Statement of Modifications Consultation

existing built up area. Whilst the allocations will deliver it is clear that any windfall homes in the future are likely to come forward on Green Belt sites, either as grey belt or through VSC's.

The Viability Study Addendum does not appear to incorporate the implications of the revised NPPF which introduces 'Golden Rules' for residential development on Green Belt land, including a requirement for 50% affordable housing.

This is a significant omission given that the proposed £150 rate applies to windfall sites. Given the tightly drawn Green Belt boundaries around the historic core of York and windfall development outside of the city centre is likely to be on Green Belt land, where the affordable housing provision is higher than that assessed in the viability work. The viability of such sites is likely to be lower than assumed, and the omission of this policy requirement undermines the robustness of the viability conclusions.

A separate CIL level should therefore be provided for any green field Green Belt sites based on their higher affordable provision.

## **2. Lack of differentiation between site types**

The proposed rate applies equally to windfall sites within the city centre which are likely brownfield and windfall sites outside of the city centre which are likely to be Green Belt/greenfield.

This fails to recognise the distinct viability profiles of these site types. Brownfield sites may benefit from existing infrastructure and higher densities, whereas Green Belt sites face greater policy requirements – such as affordable housing.

A differentiated rate structure should be considered.

## **1.2 Modification 2 - Rates for Allocated Strategic Sites**

We support the continued application of a zero CIL rate for strategic sites allocated in the Local Plan. Our client has submitted planning applications for their allocated sites at Dunnington, Haxby, Wheldrake and Copmanthorpe, all of which have been able to achieve policy compliance due to the absence of CIL.

We note that additional strategic sites have been added to the schedule and have no comments in relation to this amendment.

## **1.3 Modifications 4 – 9**

We note the proposed changes to amend the rates for sheltered/retirement accommodation and extra care accommodation as well as convenience retail up to 450sq.m and comparison retail outside the city centre to a zero charge to reflect revised viability. We support these reductions.

Reference: CIL Statement of Modifications Consultation

We have no comments to make in relation to the change in categories of purpose-built student accommodate to differentiate between on and off campus.

## 1.4 Modification 10

We support the amendments to the instalments policy which now add clarity to ensure all levels of CIL liability are included in the table.

## 1.5 Summary

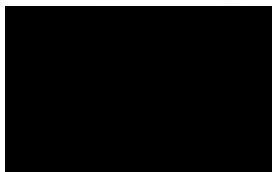
We trust that these representations will be given due consideration as part of the consultation process.

Our client remains committed to supporting the delivery of sustainable and policy-compliant housing across York and welcomes continued engagement with the Council to ensure that the CIL Charging Schedule remains viable and responsive to market conditions.

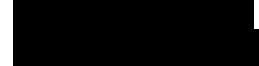
Should you require any further information or clarification, please do not hesitate to contact us.

Yours sincerely,

**Stantec UK Limited**



**Lucie Jowett**  
Planning Associate Director



[stantec.com/uk](https://stantec.com/uk)