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Sent: 15 August 2025 19:50
To: localplan@york.gov.uk
Cc: Tim Ross
Subject: City of Yorks CIL statement of modifications Consultation - Representations on Behalf of Galtres Garden Village Development Company
Attachments: 150725 GGVDC CIL Mods reps.pdf; APPENDIX 2 Council Housing Trajectory with Oneill Associates Adjustments.pdf; Housing_monitoring_update_june_2025.pdf
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Dear sir/ madam,

Please find the attached representations on behalf of Galtres Garden Village Development Company in response to the Council's CIL Statement of Modifications Consultation

Attached submission includes:

- 1) Representation prepared by O'Neill Associates
- 2) Appendix 2 to the representations
- 3) Annual Housing Monitoring and Supply Update June2025

Contact details set out below and within the submission.

Kind regards

Eamonn

O'Neill Associates

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City of York Council
CIL Statement of Modifications Consultation
15 July 2025

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:
 - a. the consultation on the Statement of Modifications, Revised draft CIL Charging Schedule, and City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics
 - b. they should be read in conjunction with previous representations made on behalf of GGVDC response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023.
 - ii. ***GGVDC requests to be heard at the examination of the City of York's CIL Charging Schedule, as an independent stakeholder organisation, and to be notified by the Council/ programme coordinator of all future events and proceedings. The notification should be provided to O'Neill Associates.***
 - iii. The CIL is proposed at a time of considerable uncertainty in terms of both the economy, and on-going changes to the planning system. In particular, the introduction of such a high CIL rate runs counter to the Governments intention of boosting housing development to achieve 1.5 million new homes by 2030.
 - iv. These representations are concerned primarily with the proposed modification to the "Residential Dwellings within York". The proposed £150/m² flat residential CIL rate - excluding certain strategic allocation sites - would be the highest in Yorkshire. By contrast, other authorities adopt zone-based rates to reflect local market values:
 - Leeds: £7.55, £34.72, £67.93, or £135/m² (index-linked)
 - Sheffield: £0, £46.18, £76.97, or £123.15/m² (index-linked)
 - v. York's blanket rate ignores value variation and disproportionately impacts lower-value areas, as well as sites with significant development constraints/ risk requiring costly
-

mitigation. It also constrains potential windfalls on Green Belt Sites – a particular issue in York where all land outside settlements is designated Green Belt.

- vi. The Council has failed to consider the effect of the proposed CIL charging schedule of potential Grey Belt sites, which national policy recognises as an important source of housing land. York is likely to depend on these sites to meet both overall housing and affordable housing targets. However, many Grey Belt sites delivering family housing with high affordable content also face substantial S106 education contributions - driven by child yield assumptions—which can vary significantly in scale.
- vii. When these S106 obligations are combined with a £150/m² CIL rate, the result is a serious threat to scheme viability, particularly for the very developments the Local Plan seeks to promote.
- viii. This runs counter to the NPPF requirement to significantly boost housing supply. York is already falling far short of its Local Plan housing targets after more than a decade of undersupply. A charging schedule that imposes the highest rate in the region, without sensitivity-testing realistic policy and s106 contribution scenarios, risks suppressing both market and affordable housing delivery—undermining the objectives of the adopted Local Plan and the *One City, for All* Council Plan (2023–2027).
- ix. Of particular relevance to the CIL debate is that windfall sites are an important component of the Councils housing land supply. In evidence to the Local Plan Examination¹ the Council included a windfall allowance of 198 dwellings per annum within their housing supply. This represents 24.2% of the local plan requirement of 822 dwellings per annum and highlights the importance of windfall development to the housing supply pipeline in York.

Local plan targets

- x. The adopted Local Plan 2025 spans the period 2017/18 to 2032/33 - a 16-year framework for delivery. Policy SS1 commits York to a minimum average annual net provision of 822 dwellings, ensuring at least 13,152 new homes by 2032/33. Crucially, it also requires that at least 45% of the city's identified need for 9,396 affordable dwellings is met during the plan period. This equates to 4,228 affordable homes, or an average of 264 per year.

Housing delivery

- xi. The Council's *Annual Housing Monitoring Update* (July 2025) shows that by the local plan's halfway point, only 5,740 dwellings had been delivered — 836 short of the number needed to be on track.
- xii. Table 2.9 below from the *Councils Annual Housing Monitoring Update 2025*, indicates that, at face value, the Council met the Local Plan housing requirement in only 6 of the first 8 years

¹ Housing Land Supply Update Addendum EX/CYC/76 Response to representations June 2022

of the plan. However, in the two years where the Local Plan requirement was exceeded, 2017/18 and 2022/23, PBSA completions contributed 637 and 232 units respectively. When these are excluded, it is evident that there has been a dramatic failure in the delivery of C3 housing in the first 8 years of the 16-year plan period.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Table 2.9: Summary of data between 1 April 2015 to 31 March 2025

Year	Completions	New Build	Net Conversions/ COU	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain	Communal Establishments	Overall net gain in Local Plan period
2015-2016	1171	908	219	1	218	6	1121		
2016-2017	996	420	564	21	543	7	977		
2017-2018	1336	1111	195	12	183	10	1296	35	1331
2018-2019	481	299	155	18	137	5	449	2	451
2019-2020	596	437	134	11	123	11	560	67	627
2020-2021	643	469	159	14	145	6	622	21	643
2021-2022	419	350	58	18	40	6	402	258	660
2022-2023	494	411	55	1	54	7	459	392	851
2023-2024	569	390	146	3	143	8	528	-63	465
2024-2025	675	395	262	4	258	8	649	63	712
Local Plan delivery 2017-2025	5213	3862	1164	81	1083	61	4965	775	5740
10 year delivery 2015-2025	7380	5190	1947	103	1844	74	7063		

- xiii. The Council has fallen short of its local plan targets for housing delivery for many years which, as a direct result of the draft CIL Charging Schedule, is likely to worsen rather than address the existing backlog.
- xiv. The *Annual Housing Monitoring Update & Five Year Housing Supply Position Monitoring Year 2024/25* includes a Housing Trajectory which the Council maintain indicates a five-year land supply of 5.7 years. We dispute that figure. Without wishing to get into a protracted debate on five-year land supply, our analysis (Appendices 1 and 2)), indicates with that even with some relatively minor adjustments on land supply based on reasonable assumptions regarding delivery, the five-year supply is 4.82 years. (We also include a copy of the Councils *Annual Housing Monitoring Update & Five Year Housing Supply Position Monitoring Year 2024/25* with these representations.)
- xv. What our analysis demonstrates is that delivery on the major strategic sites allocated in the Local Plan, which are exempt from CIL, has stalled. Housing delivery in the immediate future will increasingly be dependent on windfall sites (of all sizes) that will be subject to the £150 CIL rate.

- xvi. The proposed rate of £150 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.

Affordable Housing delivery

- xvii. The Council's *Annual Housing Monitoring Update* (July 2025) paints a stark picture: every year since the local plan period began, affordable housing delivery has fallen well short of the adopted local plan target. By the plan's halfway point, only 993 affordable dwellings had been delivered — less than half of the 2,114 needed to be on track. At the current pace, York will deliver just 1,986 affordable homes by 2032/33 — meeting only 21% of the identified need, and missing the Local Plan's affordability commitment by a wide margin. This shortfall risks deepening the city's housing crisis, leaving thousands of residents without access to the secure, affordable homes they need.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Affordable housing completions

- 2.19 During the course of the monitoring year, 129 affordable homes were completed. Over the duration of the plan period so far (2017-2025) a total of 993 affordable dwellings have been completed.
- 2.20 The housing mix in relation to delivery over the last year and over the monitoring period mirror each other with the majority of completions shown to be 1/2 bedroom flats followed by 2/3 bedroom houses¹⁰.

Table 2.12: Affordable Housing Completions – Housing Mix

Year	1-bed flat	2-bed flat	1-bed house	2-bed house	3-bed house	4-bed house	Total
2017/18	25	32	0	6	10	1	74
2018/19	5	24	2	14	15	0	60
2019/20	31	47	5	18	16	7	124
2020/21	41	27	6	29	22	5	130
2021/22	68	57	0	40	44	10	219
2022/23	38	0	0	32	42	9	121
2023/24	11	26	0	61	33	5	136
2024/25	37	34	0	26	27	5	129
Total 2017-2025	256	247	13	226	209	42	993
% split for 2024/25	29%	26%	0	20%	21%	4	100%
% split over 2017-2025	26%	25%	1%	23%	21%	4%	100%

¹⁰ "Houses" includes a small number of bungalows.

- x. 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 adopted Local Plan and 'One City for all: Council Plan' which will be severely threatened by the introduction of the draft CIL Charging Schedule.

- xi. The potential impact of the CIL on affordable housing delivery is particularly relevant to the GGVDC. The company's proposal for a new Garden Village includes affordable housing provision at 40% - higher than the maximum level of 30% set out in Policy H10 of the Draft Plan. The residential CIL rate of £150 would severely impact on the delivery of this level of affordable housing or would impact on the viability of the scheme, or both.

Green Belt/ Grey Belt

- xii. As outlined above York has suffered from persistent under delivery of housing in the first 8 years of the Local Plan - and before. All land outside settlements is Green Belt. While strategic Local Plan allocations will, at some point in the future, deliver significant housing, in the short to medium term, windfall sites will be an important component of supply. Larger windfall sites are likely to come forward on Green Belt sites, either as grey belt opportunities or through VSC's.
- xiii. Under the NPPF "Golden Rules" the affordable housing requirement on such site will be 15% above the stated Local Plan affordable requirement, or in the absence of an affordable housing policy, 50%. The CIL Viability Study had not taken account of this scenario and the potential adverse impact of the proposed £150 rate on such sites. The Council should therefore consider the implications of the £150 charge on the delivery of such sites having regard to the higher affordable provision.

Section 106 Contributions

- xiv. Current S106 education contributions—driven by high child yield assumptions—are highly variable (as shown in the table extract below) and, when combined with a £150/m² CIL rate, risk making family and affordable housing schemes unviable.
- xv. The CIL evidence base must sensitivity-test realistic education contribution scenarios to avoid a charging schedule that inadvertently blocks the very schemes the Local Plan seeks to deliver.

Below – Extract from City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.

Table 4.13 Policy DM1/s106 costs per unit tested in this Addendum

Site	S106	Supplementary Education	Other key Infrastructure	Total cost	Cost per unit
Not Strategic Site specifics	£3,208,800	£3,112,461	£0	£6,321,261	£8,274
SS8 Land Adj Hull Road (ST4)	£886,200	£1,054,611	£1,000,000	£3,419,116	£13,000
SS9 Land East of Metcalf Lane (ST7)	£3,549,000	£9,992,240	£2,500,000	£16,041,240	£18,984
SS10 Land Nth of Monks Cross (ST8)	£4,065,600	£15,274,420	£3,000,000	£22,340,020	£23,079
SS11 Land Nth of Haxby (ST9)	£3,087,000	£12,955,738	£2,000,000	£18,042,738	£24,548
SS12 Land West of Wigginton Rd (ST14)	£5,661,600	£21,568,055	£11,900,000	£39,129,655	£29,028
SS13 Land West of Elvington Lane (ST15)	£14,023,800	£52,300,000	£74,900,000	£141,233,800	£42,295
SS14 Terry's Extension Sites (ST16)	£466,200	£0	£0	£466,200	£4,200
SS16 Land at Tadcaster Rd (ST21)	£663,600	£1,210,685	£0	£1,874,285	£11,863
SS18 Station Yard, Wheldrake (ST33)	£630,000	£1,777,059	£0	£2,407,059	£16,047
SS20 Imphal Barracks (ST36)	£3,229,800	£9,093,293	£0	£12,323,093	£16,025

Source: CYC, Key Infrastructure Requirements Updated Gantt [Exam doc: EX/CYC/70]

- xvi. The lack of sensitivity testing, particularly for potential green/grey belt sites is highly concerning and undermines the robustness of the evidence base to justify such a high CIL rate compared to other areas in the Yorkshire region. 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.
- xvii. The reality and specific context of developing in York have not been properly considered. This is particularly pertinent within the context of a brownfield first context which is the thrust of the recent national policy statements, and the Local Plan spatial strategy. 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.
- xviii. Securing the long- term future of York's heritage for future generations is a key objective of the emerging local plan, and the NPPF. The draft CIL charging schedule would prevent such development because it would not be viable. Both PBSA and residential accommodation above shops makes an important contribution to housing supply but its delivery is seriously threatened by the draft CIL charging schedule.
- xix. 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, the extremely high concentration of listed buildings, and most is high flood risk. The rest of the city commands lower values but lower development costs (typically).

- xx. Without CIL relief (e.g. 'zero' rated) for conversion and upward extension of listed buildings the draft CIL charging schedule threatens the restoration and long-term future of York's heritage, and comprehensive regeneration schemes in the city centre.

Policy Requirements

- xxi. The adopted local plan's policy requirements for most developments, particularly major developments 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 City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.

- 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, 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.
- l) For example, draft local plan policy G16 seeks on-site open space provision for all residential developments, except in exceptional circumstances or for small sites. The amenity open space requirement is typically around 40.5sqm per bedroom depending of the level of local open space deficit (by electoral ward) – this spatial requirements is set out in the 2017 open space & GI update –

https://www.york.gov.uk/downloads/file/14274/open_space_and_green_infrastructure_update_2017.
- m) Cumulatively, the requirement for 40.5sqm per bedroom has significant implications for the viability of proposals, particularly large city centre schemes. A significant proportion of land within a development site would have to be given over to open space. This requirement does not seem to have been properly considered as part of the Council's draft CIL charging schedule evidence.

Five-year supply Calculation

Five Year Housing Supply

We disagree with the Councils assessment set out in their *Annual Housing Monitoring Update & Five-Year Housing Supply Position for 2024/25* dated June 2025 that their 5-year housing Land Supply is 5.7 years. The calculation of the 5-year supply is set out in Section 6 of the document.

Our assessment of the 5-year land supply is 4.82 years. The workings behind our calculation of the 5-year supply are set out below.

Table 1 – O'Neill Associates Assessment of 5-year land supply

Five Year Housing Land Supply Position for Period 2025/26 to 2030/31	
I. Five-year Requirement	5,560
J. Average annualised housing requirement over 5 years	1,112
K. Five-year Housing Land Supply (<i>Housing Trajectory with O'Neill Associates adjustments</i>)	5,357
L. Surplus/shortfall (K – I)	- 202
M. Five-year Housing Land Supply Against Requirement (K / (I / 5))	4.82 Years

Notes:

- 1 For the purpose of this calculation alone, we accept:
 - The five-year requirement of 5,560
 - The Average annualised housing requirement of 1,112
- 2 We disagree with the Councils assessment of the 5-year land supply of 6,378. Our assessment of the supply figure is **5,357**. Our assessment is based on over 25 years' experience of local market knowledge and planning and development proposals in York.
- 3 A table showing the housing trajectory and including a 5 year housing land supply calculation is provided at Section 5 of the councils Annual Housing Monitoring Update & Five-Year Housing Supply Position document. We have re-assessed the delivery of the sites in the trajectory based on information available in the public domain and our local market knowledge.

- 4 The main changes are to the timing of some completions highlighted in our adjusted housing trajectory (included as a separate document as our Appendix 2). Changes to the trajectories are highlighted by the white cells in the table. It is these changes to the trajectory which reduce the supply figure to **5,357**. The reasons for our adjustments are explained in the table below.

Table 2 Reasons for adjustments to Councils Housing trajectory

H1 a & b	Completion pushed back by one year. We have advised on this scheme and consider it unlikely completions will occur in 28/29
H8	Completions pushed back by 2 years. Site is temporarily being used as a medical facility. No application for housing submitted.
H46	Completion pushed back by 1 year. Approved by committee in January 2024. Decision not issued. Awaiting section 106 completion.
ST4	Completion pushed back by 1year. Outline permission Feb 2025. No applications for reserved matters submitted.
ST6	Unrealistic to consider that a developer will complete 999 dwellings in one year. Completions split over 2 years.
ST7	Completion pushed back by 1 year. Outline permission for 380 dwellings refused in May 2025.
ST8	Completions pushed back by 1 year. Reserved Matters not approved.
ST9	Completions pushed back by 1 year. Resolution to grant but decision held up pending signing of Section 106 Agreement.

Appendix 2

Councils Housing Trajectory with O'Neill Associates adjustments

(Submitted as a standalone document)

Annual Housing Monitoring Update & Five Year Housing Supply Position

Monitoring Year 2024/25

Published June 2025

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Executive Summary

The monitoring year runs between 1 April to 31 March each year. The statistics are updated bi-annually based upon monitoring of planning permissions and applications.

Housing Completions – Summary

In total **712 net additional homes were completed** during the monitoring year between 1 April 2024 and 31 March 2025. This total comprises two elements:

1. There have been a total of **649 net housing completions**¹. This includes the following:
 - 395 were new build homes (60.86%);
 - 258 (39.75%) net additional homes were a result of changes from other uses to residential homes, of which 33 were a result of 'prior approval' consents.
 - 4 homes resulted from conversions
 - 8 homes were demolished during the monitoring period;
2. In terms of the type of sites that were developed:
 - 485 homes (74.73%) were completed on housing sites (Use Class C3)
 - Significant sites providing housing completions (Use class C3) over the monitoring period have been the Former York City Football Ground, Bootham Crescent (25), Cocoa Works, Haxby Road (Phases II) (35), Former Civil Service Club, Boroughbridge Road (38), Cherry Tree House 218 Fifth Avenue (48), Germany Beck housing site (69), and Cocoa Works, Haxby Road (Phases I) (172)
 - 54 (8.32%) homes were on individual sites with five or less dwellings;
 - 135 (20.80%) net additional off campus, privately managed student 'cluster flats' were completed at Former Alton Cars, 3 James Street.
3. A further **63 net equivalent homes** resulted from additional bedspaces created at both new and existing care homes² within the authority area during the twelve-month monitoring period.

Housing Consents – Summary

Planning applications determined during the full monitoring period resulted in the approval of **739 net additional homes**³. A further 416 net additional homes were

¹ This figure takes account of the sum of all new build completions minus demolitions plus any gains or losses through change of use or conversions to existing properties.

² Additional care home bedspaces comprised Abbeyfield House Regency Mews (25), Haxby Hall York Road Haxby (16), York Wheelchair Centre Bluebeck House Bluebeck Drive (72) and Somerset Nursing Home 1 Church Lane Wheldrake (12). Whilst a new care home at Moorlands Nursing Home 10 - 12 Moor Lane Strensall that replaced an existing care home resulted in a loss of bedspaces (-6)

³ This figure takes account of all consents and proposed losses through demolitions and change to other uses or conversions to existing properties.

approved at Planning Committee during the monitoring period and are still awaiting legal agreement sign off.

The main features of the housing approvals are:

- 642 of all net homes consented (86.87%) were granted on housing sites (use class C3).
- Significant sites granted approval for housing (Use Class C3) includes new homes planned for housing allocations ST4: Land to South of Hull Road Heslington (162), ST33: Land to East of Millfield Industrial Estate Main Street Wheldrake (139), H29: Land to S/E of 51 Moor Lane Copmanthorpe (75) and the provision of new homes and the change of use at The Retreat 107 Heslington Road (120).
- 64 homes were approved on sites of 5 or less homes.
- 44 homes are to be lost through a change to other uses or through proposed demolition
- 133 purpose built student accommodation (PBSA) 'cluster' flats were approved at Enterprise Rent-a-Car 15 Foss Islands Road
- A further 416 homes have been approved through a resolution to grant consent at Planning Committee over the last twelve months and are currently subject to the execution of a section 106 legal agreement.
The most significant of these sites are:
 - The PBSA approved at 19 To 33 Coney Street (248),
 - Land To South And East Of The Cemetery New Lane Huntington (107),
 - Hungate Development Site (42 net additional homes compared to the previously consented total)

Housing Monitoring Update 2024/25

1 **Introduction**

- 1.1 Monitoring updates are produced bi-annually to monitor our Local Plan policies SS1: Spatial Strategy and H1: Housing Allocations regarding delivery of housing within the city. This work informs Government returns, where required, and will inform decision-taking, where necessary.
- 1.2 The data is compiled to be consistent with the Housing Delivery Test Rulebook⁴ (see also Annex 1).
- 1.3 Sources used for data collection included:
- Results from 6 monthly site visits (October and March) to verify the number of housing completions which have been carried out on each consented housing site;
 - Analysis of Building Control completion returns that provide information of both City of York Council and private building inspection records;
 - Regular contact with developers/applicants for each site over 10 dwellings to accurately monitor completions and to estimate the likely level of completions over the term of the build programme; and
 - Monitoring of extant consents, new permissions, and the inclusion of development through certificates of lawful development previously not included within housing returns.

Factors influencing delivery

- 1.4 As part of the monitoring process we seek to understand any factors influencing the progression of residential delivery in the city. Over the last few years labour and material shortages have affected housing delivery rates but more recently this has reportedly eased, particularly in relation to access to materials.
- 1.5 However, higher borrowing rates and the price of materials continue to affect the viability of projects; this has affected several sites, which have not produced the levels of completions previously anticipated in our published housing trajectories. Additionally, where a higher design specification is required, such as Passivhaus standard homes, developments have experienced delays as a result of the associated skills and procedures needed during their construction.

⁴ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>; see also Appendix 1.

2 Housing Completions 2024/25

Dwellinghouse Completions (C3)

- 2.1 A total of 649 net housing completions⁵ took place during the full 2024/25 monitoring year.

Table 2.1: Housing Completions 2024-25 (1 April 2024 to 31 March 2025)

Time Period	Completions	New Build	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain
1 April 2024 – 30 September 2024	353	99	1	243	4	339
1 October 2024 – 31 March 2025	322	296	3	15	4	310
Total 2024/25	675	395	4	258	8	649

- 2.2 Out of the overall total, 54 net additional homes were provided on sites with five or less homes being built during the monitoring period. This represents 8.3% of all completions.
- 2.3 Table 2.2 highlights the more significant developments that resulted in housing completions on traditional housing sites (Use Class C3) over the twelve-month monitoring period.

Table 2.2: Housing Completion Sites (Use Class C3)

Site Name	Net Completions (1 April 2024 to 30 Sept 2024)	Net Completions (1 October 2024 to 31 March 2025)	Net Completions (2024/25)
Heworth House Clinic Heworth House Melrosegate	6	0	6
Church House 10-14 Ogleforth	10	0	10
Land to East of Middlewood Close Rufforth	0	13	13
York City Living 22-26 Blossom Street	0	15	15
York City Football Club Bootham Crescent	9	16	25

⁵ Net housing completions are calculated as the sum of new build completions, minus demolitions, plus any gains or losses through change of use or conversions to existing properties.

The Cocoa Works Haxby Road (Phase 2)	1	34	35
Former Civil Service Club & Agricultural Land to North of Boroughbridge Road	11	27	38
Cherry Tree House 218 Fifth Avenue	48	0	48
Germany Beck East of Fordlands Road	16	53	69
The Cocoa Works Haxby Road (Phase 1)	172	0	172
Sites providing 5 dwellings or less during the monitoring period	36	18	54
All Sites	309	176	485

- 2.4 Table 2.3 provides a breakdown of the **components of housing completions** for the full monitoring period.

Table 2.3: Components of Housing Completion Sites

Time Period	Type of Approval	Number of Sites with Completions	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	Residential (Use Class 3) Approval	36	319	309
1 October 2024 – 31 March 2025		27	186	176
1 April 2024 – 30 September 2024	Prior Approval' Sites (see para 1.7 below for details)	2	33	33
1 October 2024 – 31 March 2025		0	0	0
1 April 2024 – 30 September 2024	Sites Granted Certificates of Lawful Use/Development	1	1	1
1 October 2024 – 31 March 2025		1	1	1
1 April 2024 – 30 September 2024	Sites Lost to Housing Through Change of Use/Demolition	4	N/A	-4
1 October 2024 – 31 March 2025		2	N/A	-2
1 April 2024 – 30 September 2024	Privately Managed Off Campus Student Accommodation	0	0	0
1 October 2024 – 31 March 2025		1	135	135
Total 2024/25	All sites	74	675	649

- 2.5 Table 2.4 provides details where completions relate to the '**prior approval**'⁶ category. In total these sites added 33 dwellings to the housing stock, 31 of which resulted from a conversion of commercial, business and service use to

⁶ See Appendix 1 for a full explanation of what constitutes a prior approval site.

residential homes. These completions represent a marked increase when compared to the supply from this same source over the previous three years.

- 2.6 Further, there are a number of unimplemented consents that fall within this category and there is added potential for a continued supply resulting from changes to the use class order introduced in 2022⁵.

Table 2.4: Housing Completions Resulting from 'Prior Approval' Sites

Time Period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	Bright Beginnings Day Nursery 47 Rawcliffe Drive	2	2
	Gateway 2 Holgate Park Drive	31	31
1 October 2024 – 31 March 2025	None	0	0
2024/25	All Sites	33	33

Off-campus Student Accommodation

- 2.7 Table 2.5 provides the **completions of privately managed off campus student accommodation**. Over the course of the monitoring year, this has accounted for 135 net additional homes.
- 2.8 In line with DLUHC dwelling definitions⁷, student accommodation 'can be included towards the housing provision in local development plans' and "*purpose-built (separate) homes (e.g. self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling*". There is further explanation at Appendix 1 to clarify how student accommodation is assessed in terms of housing completions.

Table 2.5: Completions via Off Campus Privately Managed Student Accommodation Sites

Time Period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	n/a	0	0
1 October 2024 – 31 March 2025	Alton Cars York Ltd 3 James Street	135	135
Total 2024/25	All Sites	135	135

- 2.9 No university managed student bedspaces were completed during the monitoring year.

⁷ see: <https://www.gov.uk/guidance/housing-statistics-and-england-housing-survey-glossary/a-to-z>

Certificates of Lawful use/development

- 2.10 A total of two net additional homes resulted from the **granting of certificates of lawful use/development** over the monitoring year. Details of these properties are included in Table 6.

Table 2.6: Completions through Certificates of Lawful Use and Permitted Use

Time period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	Minster Alpacas Sutton Road Wigginton	1	1
1 October 2024 – 31 March 2025	Annex 258 Strensall Road	1	1
Total 2024/25	All Sites	2	2

Homes lost through changes of use

- 2.11 Table 2.7 provides details of **approvals that have led to losses of homes through changes to other uses**. This has resulted in a net loss of 4 homes over the monitoring year.

Table 2.7: Sites lost to housing through change of use.

Time period	Site Name	Description of change/conversion	Net Homes Lost
1 April 2024 – 30 Sept 2024	2 Queen Annes Road	Change of use from C3 dwelling to C1 short term letting accommodation (retrospective)	-1
	Rowntree Park Lodge Richardson Street	Change of use of upper floors from residential use (Use Class C3) to a community venue/hub (Use Class F2)	-1
	27 St Helens Road	Erection of 17no. extra care flats and 8no. dementia care flats following demolition of no.27 St Helens Road	-1
	33 Spen Lane	Conversion of 1no. dwelling to 2no. flats, to be used for holiday accommodation.	-1
	7 Nunthorpe Avenue	Change of use from HMO (C4) and Flat (C3) to Large House in Multiple Occupation (Sui Generis)	-1
	2 The Mews St Catherines House Skelton	Change of use from residential (Class C3) to acupuncture clinic (Class E)	-1
2024/25	All Sites		-6

Communal Establishments

- 2.12 Table 2.8 sets out the Equivalent Net Homes through Communal Establishments.

Table 2.8 Equivalent Net Homes through communal establishments

Year	Equivalent Net Homes through Communal Establishments
2017-2018	35
2018-2019	2
2019-2020	67
2020-2021	21
2021-2022	258
2022-2023	392
2023-2024	-63
2024-2025	63
2017-2025	775

- 2.13 A net addition of 119 care home bedspaces took place during the monitoring period. These included Abbeyfield House Regency Mews (25), Haxby Hall York Road Haxby (16), York Wheelchair Centre Bluebeck House Bluebeck Drive (72) and Somerset Nursing Home 1 Church Lane Wheldrake (12). Whilst a new care home at Moorlands Nursing Home 10 - 12 Moor Lane Strensall that replaced an existing care home resulted in a loss of bedspaces (-6).
- 2.14 Applying the national ratio⁸ this results in a net gain of 63 homes to the overall net housing figure for the year.

Completion Trend Data

- 2.15 Table 2.9 provides details of all net housing completions over the Local Plan monitoring period between 2017-2025 and the previous 10 full monitoring years.
- 2.16 Over the Local Plan period, we have had 4965 net housing completions, 775 equivalent communal establishment homes resulting in an additional 5,740 homes overall.
- 2.17 Considering trends over the previous monitoring years the figures reveal⁹:

	10 years 2015 - 2025	5 years 2020-2025
Total net completions	7063	2660
Mean average additional homes	706.3	532
Median average Additional Homes	591	528

⁸ See appendix 1 for details of the ratio used for the conversion to net dwellings.

⁹ See appendix 1 for notes regarding 'mean' and 'median'

Table 2.9: Summary of data between 1 April 2015 to 31 March 2025

Year	Completions	New Build	Net Conversions/ COU	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain	Communal Establishments	Overall net gain in Local Plan period
2015-2016	1171	908	219	1	218	6	1121		
2016-2017	996	420	564	21	543	7	977		
2017-2018	1336	1111	195	12	183	10	1296	35	1331
2018-2019	481	299	155	18	137	5	449	2	451
2019-2020	596	437	134	11	123	11	560	67	627
2020-2021	643	469	159	14	145	6	622	21	643
2021-2022	419	350	58	18	40	6	402	258	660
2022-2023	494	411	55	1	54	7	459	392	851
2023-2024	569	390	146	3	143	8	528	-63	465
2024-2025	675	395	262	4	258	8	649	63	712
Local Plan delivery 2017-2025	5213	3862	1164	81	1083	61	4965	775	5740
10 year delivery 2015-2025	7380	5190	1947	103	1844	74	7063		

Housing Mix and Type

- 2.18 Analysis of housing mix based upon gross completions shows that the most significant delivery was 1 bed and 2 bedroom flats followed by 3 and 4 bed houses.

Table 2.10: 2024/25 Completions (gross) – Housing Mix

Dwelling Type	1 Bed	2 Bed	3 Bed	4 Bed	5+ Bed	Totals	%
Detached House	0	0	27	44	9	80	11.85%
Semi-detached House	0	5	27	7	0	39	5.78%
Detached Bungalow	0	4	5	0	0	9	1.33%
Semi-detached Bungalow	0	3	0	0	0	3	0.44%
Town House/ Terraced House	2	39	36	12	7	96	14.22%

Flat/Apartment/Studio	283	121	17	0	27	448	66.37%
Totals	285	172	112	63	43	675	
%	42.22%	25.48%	16.59%	9.33%	6.37%	42.22%	

Table 2.11: 2024/25 housing mix aggregated by dwelling type

Dwelling Type	Totals	Percentage
Detached (all types)	89	13.19%
Semi-detached (all types)	42	6.22%
Terraced/Town House	96	14.22%
Flat/Apartment/Studio	448	66.37%
Totals	675	100.00%

Affordable housing completions

- 2.19 During the course of the monitoring year, 129 affordable homes were completed. Over the duration of the plan period so far (2017-2015) a total of 993 affordable dwellings have been completed.
- 2.20 The housing mix in relation to delivery over the last year and over the monitoring period mirror each other with the majority of completions shown to be 1/2 bedroom flats followed by 2/3 bedroom houses¹⁰.

Table 2.12: Affordable Housing Completions – Housing Mix

Year	1-bed flat	2-bed flat	1-bed house	2-bed house	3-bed house	4-bed house	Total
2017/18	25	32	0	6	10	1	74
2018/19	5	24	2	14	15	0	60
2019/20	31	47	5	18	16	7	124
2020/21	41	27	6	29	22	5	130
2021/22	68	57	0	40	44	10	219
2022/23	38	0	0	32	42	9	121
2023/24	11	26	0	61	33	5	136
2024/25	37	34	0	26	27	5	129
Total 2017-2025	256	247	13	226	209	42	993
% split for 2024/25	29%	26%	0	20%	21%	4	100%
% split over 2017-2025	26%	25%	1%	23%	21%	4%	100%

¹⁰ "Houses" includes a small number of bungalows.

Figure 1: Affordable Housing Mix (By Bedroom Numbers) 2017/18 to 2024/25

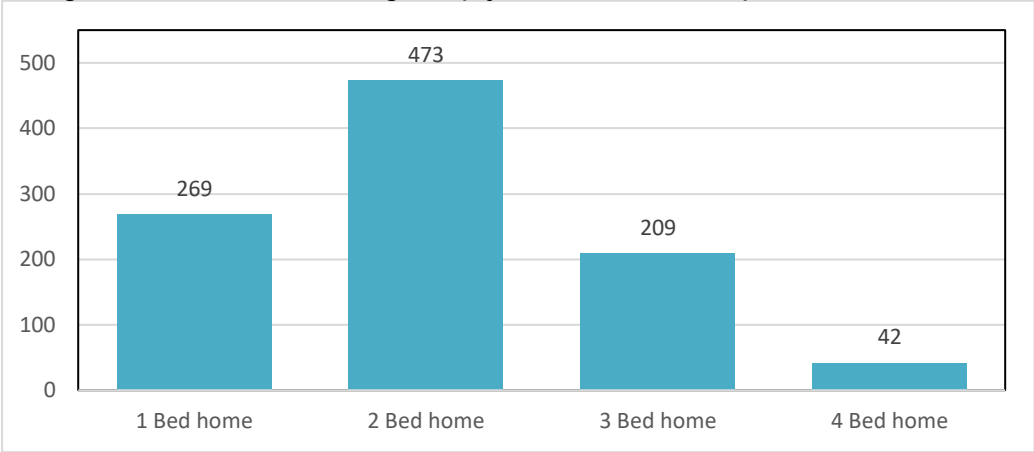
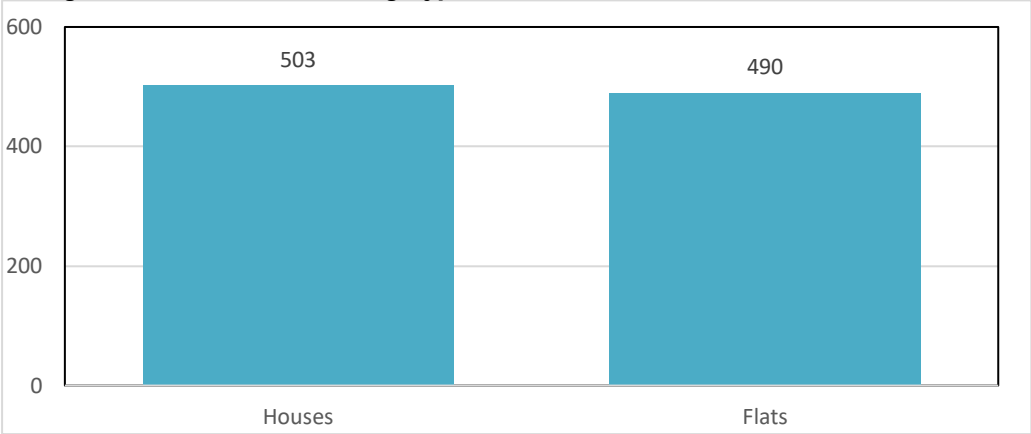


Figure 2: Affordable Housing Type 2017/18 to 2024/25



3 **Housing Consents 2024/25**

- 3.1 During the full 2024/25 monitoring year a **total of 739 net new homes were granted consent within the City of York authority area**. Table 3.1 shows that 603 of these approvals are for new build homes whilst 147 new homes were consented for the change of use of non-residential buildings.

Table 3.1: Housing Consents (1 April 2024 to 31 March 2025)

Year	Consents (Gross)	Proposed New Build	Proposed Net Conversions	Proposed Net Change of Use	Proposed Demolitions	Potential Net Dwelling Gain
1 April 2024 – 30 September 2024	399	353	-1	36	5	383
1 October 2024 – 31 March 2025	380	250	2	111	7	356
2024/25	779	603	1	147	12	739

- 3.2 Of the 739 net additional homes granted consent, the greatest proportion were the result of 642 net homes being approved on standard housing (Use Class C3) sites. Table 3.2 provides details of the largest contributors within the housing approvals including the new homes planned for housing allocation ST4: Land to South of Hull Road Heslington (162), ST33: Land to East of Millfield Industrial Estate Main Street Wheldrake (139), H29: Land to S/E of 51 Moor Lane Copmanthorpe (75) and the provision of new homes and the change of use at The Retreat 107 Heslington Road (120). A further 64 net new homes gained approval on sites with a capacity of 5 homes or less.

Table 3.2: Housing Consents (Use Class C3)

	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 April 2024 – 30 September 2024	Card Factory 24-25 High Ousegate	6	6
	Development Site Hospital Fields Road & Ordnance Lane	16	16
	Land to S/E of 51 Moor Lane Copmanthorpe	75	75
	Land to East of Millfield Industrial Estate Main Street Wheldrake	139	139
	Sites Granted Consent for 5 or less Homes	52	36
	3-7 Coney Street	7	7

1 October 2024 – 31 March 2025	John Richards (Developments) Ltd 7 Regent Buildings York Road Acomb	9	9
	Dean Court Secure Car Park R/O Portland Street	9	9
	Tramways Club 1 Mill Street	35	35
	The Retreat 107 Heslington Road	120	120
	Land to South of Hull Road Heslington	162	162
	Sites Granted Consent for 5 or less Homes	51	28
2024/25	All Sites	681	642

Table 3.3 provides a detailed breakdown of the various categories of housing approval that make up the consented totals, this being a combination of traditional (Use Class 3) residential approvals, sites with 'prior approval', privately managed off-campus student accommodation and sites granted certificates of lawful use/development. The figures in this table also takes account of approved losses through demolition or changes to other uses.

Table 3.3: Components of Housing Consents (1 April 2024 to 31 March 2025)

Year	Type of Approval	Number of Sites Granted Consent for Housing	Gross Additional Homes Consented	Net Additional Homes Consented
1 April 2024 – 30 September 2024	Residential (Use Class 3) Approval	33	288	272
1 October 2024 – 31 March 2025		38	393	370
1 April 2024 – 30 September 2024	Prior Approval' Sites (see Appendix 1 for details)	1	1	1
1 October 2024 – 31 March 2025		5	6	5
1 April 2024 – 30 September 2024	Sites Granted Certificates of Lawful Use/Development	1	1	1
1 October 2024 – 31 March 2025		1	1	1
1 April 2024 – 30 September 2024	Sites Lost to Housing Through Change of Use/Demolition	2	-24	-24
1 October 2024 – 31 March 2025		2	-20	-20
1 April 2024 – 30 September 2024	Privately Managed Off Campus Student Accommodation	1	133	133
1 October 2024 – 31 March 2025		0	0	0

2024/25	All Sites		779	739
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Prior Approval Consents

- 3.3 Six sites were granted 'prior approval' through the change of use from commercial, business and service (Use Class E) or agricultural use (sui generis) to residential use (see Table 3.4), most of which were approved during the first half of the monitoring year.

Table 3.4: Sites Consented as a Result of 'Prior Approval'

	Site Name	Gross Additional Homes Approved	Net Additional Homes Approved
1 April 2024 – 30 September 2024	Former RAF Units Beechlands to Parish Boundary Acaster Malbis	1	1
1 October 2024 – 31 March 2025	GMB General Union 75 Gillygate	2	2
	NatWest 14 Main Street Heslington	1	1
	36 Moor Lane Strensall	1	0
	Duncombe Farm Duncombe Lane Strensall	1	1
	Tegz Hair Design 1 Plantation Drive	1	1
2024/25	All Sites	7	6

Off campus student accommodation consents

- 3.4 Table 3.5 shows that during the monitoring period the former Enterprise Rent-a-Car site at 15 Foss Islands Road was granted consent for 133 studio flats for students.

Table 3.5: Privately managed off campus student accommodation consents

Time period	Site Name	Gross Additional Homes Approved	Net Additional Homes Approved
1 April 2024 – 30 September 2024	Enterprise Rent-a-Car 15 Foss Islands Road	133	133
1 October 2024 – 31 March 2025	None	0	0
2024/25	All Sites	133	133

Certificates of Lawful Use consents

- 3.5 Two sites gained approval via certificates of lawful use/development resulting in the approval of 6 net additional homes within this category (Table 3.6).

Table 3.6: Consents Granted through Certificates of Lawful Use/ Development

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 April 2024 – 30 September 2024	Minster Alpacas Sutton Road Wigginton	1	1
1 October 2024 – 31 March 2025	Annex 258 Strensall Road	1	1
2024/25	All Sites	7	6

- 3.6 In addition to the 739 net additional approvals, a further 416 homes were approved by Planning Committee during the twelve-month period through resolutions to grant planning permission subject to the execution of a section 106 legal agreement and required conditions.
- 3.7 Table 3.7 provides details of all these sites, with the most significant sites being purpose built student accommodation approved for Coney Street (248) and new residential development at New Lane Huntington (107). Approval of 42 net additional homes on the Hungate Development Site also adds to the previously consented residential offer.

Table 3.7: Sites with a resolution to grant planning permission subject to the execution of a legal agreement.

	Site Name	Gross Additional Homes Approved	Net Additional Homes Approved
1 October 2024 – 31 March 2025	Site Of 19 To 33 Coney Street	248	248
	Land To South And East Of The Cemetery New Lane Huntington	107	107
	Land To The West Of 1 To 8 Garthway New Earswick	14	14
	Hungate Development Site Hungate	221	42
	Garages At Hawthorn Terrace South New Earswick	5	5
2024/25	All Sites	595	416

Housing Consent Trend Data

- 3.8 Table 3.8 shows that York had 11,743 extant consents overall at year end (31 March 2025).
- 3.9 To provide context to recent planning approvals, Table 17 shows:
- 11,743 net consents over the last 10 full monitoring years:
 - mean average of **1,174.3** annual housing consents
 - median average of **921.5** annual consents.
 - 4,416 net consents over the last 5 years:
 - a mean average of **883.2** annual consents
 - a median average of **739** annual consents.

Table 3.8: Housing Consents Granted Between 1 April 2015 and 31 March 2025

Year	Gross Housing Permissions	Net Housing Permissions
2015/2016	710	680
2016/2017	487	451
2017/2018	1147	1104
2018/2019	1658	1626
2019/2020	3488	3466
2020/2021	1151	1133
2021/2022	354	327
2022/2023	1586	1559
2023/2024	684	658
2024/2025	779	739
2015 to 2025	12044	11743

4 **Local Plan site allocations monitoring**

- 4.1 See Section 5 Housing Trajectory for how the sites are anticipated to be built out over the plan period.

Housing Allocations Below 5 ha (H Sites)

Local Plan Allocation Reference	Planning status
H1a & b Former Gas Works, 24 Heworth Green	Planning consent approved; site remediation ongoing: <ul style="list-style-type: none"> • 19/00979/OUTM – 607 homes • Zone A: 21/00855/REMM (119 homes) • Zone B: 22/01281/REMM (392 homes). • Zone C: 21/00854/REMM (96 homes)
H3 Burnholme School	Outline Planning permission approved for 83 dwellings; No matters reserved except for the appearance, scale and internal layout of 5no. self-build plots in Terrace 5. (20/01916/OUTM)
H5 Lowfield School	Outline and full planning approval consented. <ul style="list-style-type: none"> • 17/02429/OUTM • 17/02428/FULM - erection of 96no. two and three storey houses, 26no. bungalows and three storey 18no. apartment building with new access and associated infrastructure • 18/02925/FULM - Erection of 5no. apartments, 5no. two bedroom housing units, 6no. three bedroom housing units, 3no. four bedroom housing units and a shared common house/amenity block and associated infrastructure to form community housing development •
H7 Bootham Crescent	Full planning consent approved 01/02/2022 (19/00246/FULM) for 93 dwellings. Construction ongoing.
H8 Askham Bar Park & Ride	No application or pending application for residential use. Temporary permission granted for health facility.
H10 The Barbican	Planning consent lapsed for 187 dwellings (13/02135/FULM).
H20 Former Oakhaven EPH	22/00304/FULM for 64 bed care home approved 05/08/2022
H29 Land at Moor Lane Copmanthorpe	19/00602/FULM full approval granted 07/06/2024.
H31 Eastfield Lane Dunnington	20/01626/FULM approved on 18/07/2022 for 83 dwellings 24/01669/FULM pending approval at 1 April 2025.
H38 Land RO Rufforth Primary School Rufforth	22/01844/FULM full approval granted 17/04/2023

H39 North of Church Lane Elvington	No consent or pending applications.
H46 Land to North of Willow Bank and East of Haxby Road, New Earswick	20/02495/FULM approved by planning committee on 18.01.2024; pending final decision. Approved for 177 dwellings, pumping station and substation together with means of vehicular and pedestrian access, associated parking, landscaping and open space
H52 Willow House EPH, 34 Long Close Lane	No consent or pending application
H53 Land at Knapton Village	Application pending decision for 6 dwellings (24/00726/FUL)
H55 Land at Layerthorpe	No consent or pending application
H58 Clifton Without Primary school	22/00685/OUTM approved for 15 dwellings on 11/11/2022
SH1 Land at Heworth Croft	No consent or pending application

Housing Allocations Above 5 ha (ST Sites)

Local Plan Allocation Reference	Planning Status
ST1: British Sugar/ Manor School Allocated for 1200 homes	Outline PP approved 28.9.18 for up to 1,100 homes (15/00524/OUTM) Remediation works underway. Manor School part of the site is included in the CYC Housing Delivery Programme (100 homes)
ST2: Former Civil Service Sports Ground Millfield Lane Allocated for 263 homes	Full PP for 266 homes approved 25.10.19 (14/02979/FULM) Site under construction.
ST4: Land Adj. Hull Road and Grimston Bar Allocated for 263 homes	Full planning permission approved 28/02/2025. <ul style="list-style-type: none"> 15/00166/FULM (166 homes) 15/00167/FULM (52 homes) Pending construction.
ST5: York Central Allocated for 2,500 homes	Outline PP approved 24.12.19 for up to 2,500 homes as part of a mixed-use scheme.
ST7: Land East of Metcalfe Lane Allocated for 845 homes	Application 24/02302/OUTM pending decision at 1 April 2025.

ST8: Land North of Monks Cross Allocated for 968 homes	Outline PP for around 970 homes approved 14.12.22. Reserved matters being progressed.
ST9: Land North of Haxby Allocated for 735 homes	Application 23/00160/OUTM pending decision at 1 April 2025..
ST14: Land to West of Wigginton Road Allocated for 1348 homes	No consent or pending application.
ST15: Land to West of Elvington Lane Allocated for 3339 homes	No consent or pending application
ST16 Terrys extension site: Clock tower (Phase 1)	Full permission for 22 homes and museum space permitted 14.12.2022 (22/00542/FUL) Construction completed.
ST16: Terrys Extension Site: Terrys Car Park (Phase 2) Allocated for 39 homes	Full application for extra care accommodation including no.72 apartments – approved by appeal 15.03.2024 (23/00608/FULM)
ST17: Nestle South (Phase 1) Allocated for 279 homes	Full permission for 279 homes granted approval on 03.03.2020 Completed
ST17: Nestle South (Phase 2) Allocated for 302 homes	Full application approved 28.01.2022 (21/01371/FULM) Site under construction
ST31: Land to the South of Tadcaster Road, Copmanthorpe Allocated for 158 homes	Outline PP approved for 158 homes 28.4.23 (18/00980/OUTM) Reserved Matters approved 14.02.2025 for 133no. dwellings, 7no. self-build dwellings and associated infrastructure (23/02256/REMM)
ST32: Hungate (Phases 5+) Allocated for 570 homes	Full permission for erection of an apartment block to comprise residential units (Use Class C3) together with flexible commercial uses (Use Class E and F2), landscaping and associated works (Block H) approved at committee 16.01.25. Pending legal agreement for final decision.
ST33: Station Yard Wheldarke Allocated for 150 homes	Full planning permission approved 17.05.2024 for 139 homes landscaping and associated infrastructure
ST36: Imphal Barracks, Fulford Road	No consent or pending application.

Allocated for 769 homes	No pre-app or preliminary discussions
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5 Housing Trajectory at 1 April 2025

		Total	Actual Completions																						
			2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Post 2038	
1. Net Housing Completions 2017 to 2024																									
	Net Housing Completion		1296	449	560	622	402	459	528	649															
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		35	2	67	21	258	392	-63	63															
Total			1331	451	627	643	660	851	465	712															
2. Housing Allocations Below 5 ha (H Sites)																									
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607												392	215										
H3	Burnholme School	83									65	13	5												
H5	Lowfield School	165									14	5													
H7	Bootham Crescent	93									40	18													
H8	Askham Bar Park & Ride	60												35	25										
H10	The Barbican	187												187											
H20	Former Oakhaven EPH	34										34													
H29	Land at Moor Lane Copmanthorpe	86									10	30	30	5											
H31	Eastfield Lane Dunnington	83										10	30	30	13										
H38	Land RO Rufforth Primary School Rufforth	21									8														
H39	North of Church Lane Elvington	32												17	15										
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	117										20	35	40	22										
H52	Willow House EPH, 34 Long Close Lane	15												15											
H53	Land at Knapton Village	4										4													
H55	Land at Layerthorpe	20													20										
H58	Clifton Without Primary school	15											15												
SH1	Land at Heworth Croft	167														167									
Annualised Projected Completions H Sites (Hide)											137	134	115	721	310	167	0	0	0	0	0	0	0	0	
3. Housing Allocations Above 5 ha (ST Sites)																									
ST1a	British Sugar/Manor School	1100													50	150	150	150	150	150	150	150			
ST1b	Manor School	100													35	35	30								
ST2	Former Civil Service Sports Ground Millfield Lane	263									60	46	17												
ST4	Land Adj. Hull Road and Grimston Bar	211										17	50	50	45										
ST5	York Central	2500													999			501		136			450	414	
ST7	Land East of Metcalfe Lane	845												50	90	120	120	120	120	105					
ST8	Land North of Monks Cross	970										50	100	100	100	100	100	100	100	100	20				
ST9	Land North of Haxby	700											45	90	90	90	90	90	90	25					
ST14	Land to West of Wigginton Road	1348												60	60	160	160	160	160	160	160	108			
ST15	Land to West of Elvington Lane	3339												50	75	160	200	200	200	200	240	240	240	1534	
ST16	Terrys Extension Site - Terrys Car park (Phase 2)	38												38											
ST17	Nestle South (Phase 2)	302									64	0	61	127	15										
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158									17	42	46	35											
ST32	Hungate	613											196		221		196								
ST33	Station Yard Wheldarke	147									10	30	30	30	30	9									
ST36	Imphal Barracks, Fulford Road	769															100	100	100	100	100	100		169	
Annualised Projected Completions for ST Sites											151	185	545	630	1775	824	1051	1451	920	1056	880	670	898		
4. Projected Housing Completions From Non Allocated Unimplemented Consents (Inclusive of																									
Total		2007									414	487	406	444	90	61	35	35	35						
5. Projected Housing Completions From Communal Establishments/Student Accommodation																									
Total		107									19	0	0	88	0	0	0	0	0	0	0	0	0		
Supply Trajectory																									
Actual Net Completions (2017 to 2025)			1331	451	627	643	660	851	465	712															
Projected Completions (all sites)											721	806	1066	1883	2175	1052	1086	1486	955	1056	880	670	898		
Windfalls											0	0	0	196	196	196	196	196	196	196	196	196	196		
Projected Annual Housing Completions (Inc Windfall Allowance)											721	806	1066	2079	2371	1248	1282	1682	1151	1252	1076	866	1094		
Cumulative Completions (Including Windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6461	7267	8333	10412	12783	14031	15313	16995	18146	19398	20474	21340	22434		
Over/Under Supply			509	138	-57	-236	-398	-369	-726	-836	-937	-953	-709	548	2097	2523	2983	3843	4172	4602	4856	4900	5172		
Detailed Trajectory (including 10% Non-Implementation (NI) Rate)																									
A. Projected Completions (all sites) - 10% NI Applied											649	725	959	1695	1958	947	977	1337	860	950	792	603	808		
B. Windfall Allowance														196	196	196	196	196	196	196	196	196	196		
C. Projected Annual Completions (A + B) + Actual completions 2017-2025			1331	451	627	643	660	851	465	712	649	725	959	1891	2154	1143	1173	1533	1056	1146	988	799	1004		
D. Cumulative Annual Completions (10% NI applied and windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6389	7114	8074	9964	12118	13261	14434	15968	17023	18169	19157	19956	20961		
E. Annual requirement			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822		
F. Cumulative Annual Requirement			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152	13974	14796	15618	16440	17262		
G. Over/Under Supply (D - F)			509	138	-57	-236	-398	-369	-726	-836	-1009	-1106	-968	100	1432	1753	2104	2816	3049	3373	3539	3516	3699		
5 Year Housing Land Supply Position																									
H. 5 year requirement (822 * 5)										4110	4110	4110	4110	4110	4110	4110	4110								
I. Shortfall to be carried over remaining plan period (absolute value of G)										836	1009	1106	968	0	0	0	0	0							
J. Shortfall within 5 years (5 x (G ÷ remaining plan period)) (Liverpool)										523	721	921	968	0	0	0	0	0							
K. 20% Buffer (0.2 x (H + J))										927	966	1006	1016	822	822										
L. 5% Buffer (0.05 x H)																206	206	206							
M. Rolling Total Five Year requirement (H + J + buffer)										5559	5797	6038	6094	4110	4110	4316	4316	4316							
N Rolling Five year land supply (from row C)										6378	6872	7320	7894	7059	6052	5897	5522	4993							
O. Over/under Supply (with NI applied) against total 5 year requirement (N - M)										819	1075	1282	1800	2949	1942	1581	1207	678							
P. Land supply in Years (no account for previous oversupply)										5.74	5.93	6.06	6.48	8.59	7.36	6.83	6.40	5.79							

6 **Five Year Housing Land Supply**

The Council's 5-year housing land supply position based on the Local Plan housing Trajectory at 1 April 2025. This demonstrates a **5.74 year housing supply**.

Housing Requirement

- 6.1 The baseline against which the deliverable supply of housing land is assessed is known as the "housing requirement". For York this is based on the adopted Local Plan (2025), which sets out an annual housing target of 822 dwellings per annum.

Buffer

- 6.2 A buffer of 20% must be added to the supply of sites where an authority's performance in the Housing Delivery Test (HDT) indicates that delivery has fallen below 85% of its housing requirement over the previous three years¹¹. The City of York last scored 79% in the results published 19 December 2024¹² so a buffer of 20% is required.

Shortfall

- 6.3 The National Planning Practice Guidance¹³ advises that where shortfalls in housing completions have been identified against planned requirements, the shortfall should be included in the 5 year housing land supply.
- 6.4 It was demonstrated through the Local Plan Examination that delivery of all shortfall within the first 5 years (the 'Sedgefield Method') would not meet the NPPF expectations to be realistic. Therefore, we have justified the use of the 'Liverpool Method' to deliver supply whereby shortfall is sought to be met over the plan period.
- 6.5 On that basis, an additional 523 homes are required to meet the shortfall between 2017 to 2025.

Table 6.1: Housing Delivery 2017 to 2025

Total Net Completions	
A. Total Completions 2017/18 to 2024/25	5740
B. Requirement 2017/18 to 2024/25	6576
C. Shortfall in housing delivery 2017/18 to 2024/25 (B-A)	836
D. Shortfall to be delivered over 5 years (5 x (C/8) (Liverpool Method)	523

Table 6.2: Five-year Housing Land Requirement

¹¹ Based on government information and using the Housing Delivery Test Rulebook:

<https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

¹² <https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement>

¹³ <https://www.gov.uk/guidance/housing-supply-and-delivery#demonstrating-a-5-year-housing-land-supply>

Five year Housing Land Requirement	
E. Annual Housing Requirement	822
F. Five-year Housing Requirement (5 x E)	4110
G. Five-year Housing Requirement Incorporating Shortfall (F + D)	4633
H. Buffer 20% (G x 0.2)	927
I. Five-year Requirement (G + H)	5560

Sites in the supply

- 6.6 This section of the report provides details of the sources of housing supply that the Council has determined to be deliverable within 5 years.
- 6.7 The NPPF defines deliverable for the purposes of including sites within the 5-year housing land supply. It separates sites into two distinct categories. It states that:
'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
(a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
(b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'
- 6.8 The assessment undertaken to inform the position applies this deliverability definition to the Council's ongoing monitoring of sites, set out in section 1 and 2 of this report.

Communal Accommodation

- 6.9 The NPPF and PPG recognise that student and other communal accommodation should form part of housing supply, based on the amount of housing they free up to the market. As such it is appropriate to factor in development for student and other communal accommodation into the housing supply assessment and the Council has also justified this approach as part of the Local Plan examination⁵.
- 6.10 National guidance sets out a process to identify the amount of housing it releases using ratios for student accommodation and residential institutions as follows:
- Student dwelling ratio of 2.5
 - Residential institution ratio of 1.8
- 6.11 These ratios have been applied to relevant sites and incorporated into the supply calculation.

Windfall allowance

- 6.12 The NPPF states that ‘*where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends*’. The emerging Local Plan allocates very few sites of 10 dwellings or less, but it is expected that developments (including conversions/changes of use) on small sites will continue to form part of new housing supply in line with evidenced past trends.
- 6.13 The latest evidence of windfall supply in York is published alongside this report and justifies a rate of 196 dwellings per year from year 4 onwards in the Council’s trajectory of development across the Local Plan period. As the windfall allowance for small sites uses completion data rather than permissions there is a high degree of certainty that this rate of delivery will be achieved. It is therefore not necessary to apply a non-implementation discount to this element of the supply.

Table 6.3: Sources of Five-year Housing Land Supply

Deliverable Supply	
All approved sites (with 10% non-implementation rate applied)	4743
Sites with planning permission for communal establishments (with 10% non-implementation rate applied)	96
Local Plan Allocations without consent and allocated sites with a resolution to grant planning permission (with 10% non-implementation rate applied)	810
Sites with resolution to grant planning permission (with 10% non-implementation rate applied)	337
Windfall allowance - 196(years 4 and 5)	392
Total	6378

Summary Table

Table 6.4: Five-Year Housing Land Supply Position for Period 2025/26 to 2030/31

Five Year Housing Land Supply Position for Period 2025/26 to 2030/31	
I. Five-year Requirement (Table 6.2)	5560
J. Average annualised housing requirement over 5 years	1112
K. Five-year Housing Land Supply (Table 6.3)	6378
L. Surplus/shortfall (K – I)	+ 818
M. Five-year Housing Land Supply Against Requirement (K / (I / 5))	5.74 Years

Appendix 1: Notes

Calculation of Student Accommodation Units and Communal Establishment Accommodation within the Housing Figures

We use two nationally set ratios to calculate student accommodation units for inputting into our monitoring figures. Currently bedspaces for student communal accommodation are divided by 2.4 and all other communal accommodation is divided by 1.9 based on 2021 Census analysis.

MHCLG have produced a "[Housing statistics and English Housing Survey glossary](#)"¹⁰. Within the definition for Dwelling (Housing supply; net additional dwellings), it is stated that

"purpose-built (separate) homes (eg self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling".

Updated National Planning Practice Guidance (NPPG) provides direction for local authorities when dealing with student housing in their housing supply and is covered in the *Counting Other Forms of Accommodation* section (paragraph 034 Reference ID: 68-034-20190722)¹¹. This confirms that *"All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply..."* based on a number of criteria.

Further clarification is provided through the dwelling definition in the [Housing Flow Reconciliation \(HFR\) returns form and guidance notes](#)¹² where MHCLG have provided direction to local authorities relating to student accommodation and communal accommodation for their assessment of completions.

Each housing site including off campus privately managed student accommodation has been assessed in these terms by CYC in calculating housing capacity and is represented in the tables above.

For example, the Proposed Student Accommodation at Hallfield Road comprised 326 bed spaces in 28 x 1, 2 x 3, 17 x 4, 40 x 5 and 4 x 6 bed cluster units and was calculated as **91** housing units when the DLUHC definition was applied. Whereas, St Josephs Convent, Lawrence Street included 660 bed spaces in 514 x 1, 1 x 3, 19 x 5 and 8 x 6 bed cluster units which equated to **542** housing units when the DLUHC definition was applied.

Averages used within this document.

For clarity:

The calculation of a **mean average** results from adding up all the numbers and then dividing by the number of numbers – this is the usual way of displaying an average and takes account of all figures.

The **median average** is the "middle" value in the list of numbers. To find the median the numbers need to be listed in numerical order from smallest to largest and the mid-point is taken. The potential advantage of using a median average is that very large and very small values don't affect it.

Prior Approval Sites

By way of background information, regulations came into force in May 2013 that increased permitted development and change of use rights in England so that some building work could be undertaken without the need for full planning permission¹³. This was to be a temporary arrangement for 3 years until May 2016. However, in October 2015 the Housing and Planning Minister announced new measures proposed in the Housing and Planning Bill that the then temporary relaxation of permitted development (PD) rights allowing for office to residential conversions (ORCs) together with certain retail, financial services and existing agricultural buildings were to become permanent.

When the new Use Class E came into force in September 2020 it introduced flexibility into changes of use by grouping together commercial, business and service uses and allowing change between these uses without requiring planning permission. The extension to PD rights now provides further flexibility by allowing uses within Class E to change to residential use. The new PD rights allow restaurants, medical facilities, creches, gyms and indoor sports facilities to change to residential use without requiring planning permission subject to certain conditions and regulations such as Environmental Impact Assessments and Habitats Regulations.

Housing Flow reconciliation returns

Submission of completions to the Government through annual Housing Flows Reconciliation Returns¹⁴ requires that full details of net homes delivered in a year should be confirmed annually. This calculation is based on:

1. Net Additional Dwellings National Statistic, plus
2. Net increase in bedrooms in student communal accommodation in local authority divided by average number of students in student only households in England, plus
3. Net increase in bedrooms in other communal accommodation in local authority divided by average number of adults in households in England.

The adjustments for student and other communal accommodation are calculated by DLUHC and applied to the Housing Delivery Test submission. Adjustments are made using two nationally set ratios and are based on England Census data, as above¹⁵.

¹⁴ <https://www.gov.uk/government/collections/net-supply-of-housing>

¹⁵ Following the publication of the latest housing delivery test rulebook in December 2024 Table 9 includes a combination of the old and new ratios from both the 2011 and 2021 Census results. Our figures have been adjusted since our last publication to align with MHCLG figures.

Further Information

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e: localplan@york.gov.uk

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Housing Trajectory at 1 April 2025

		Total	Actual Completions																					
			2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Post 2038
1. Net Housing Completions 2017 to 2024																								
	Net Housing Completion		1296	449	560	622	402	459	528	649														
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		35	2	67	21	258	392	-63	63														
Total			1331	451	627	643	660	851	465	712														
2. Housing Allocations Below 5 ha (H Sites)																								
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607													392	215								
H3	Burnholme School	83									65	13	5											
H5	Lowfield School	165									14	5												
H7	Bootham Crescent	93									40	18												
H8	Askham Bar Park & Ride	60														35	25							
H10	The Barbican	187												187										
H20	Former Oakhaven EPH	34										34												
H29	Land at Moor Lane Copmanthorpe	86									10	30	30	5										
H31	Eastfield Lane Dunnington	83											10	30	30	13								
H38	Land RO Rufforth Primary School Rufforth	21									8													
H39	North of Church Lane Elvington	32												17	15									
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	117											20	35	40	22								
H52	Willow House EPH, 34 Long Close Lane	15												15										
H53	Land at Knapton Village	4										4												
H55	Land at Layerthorpe	20													20									
H58	Clifton Without Primary school	15											15											
SH1	Land at Heworth Croft	167														167								
Annualised Projected Completions H Sites (Hide)											137	104	80	289	497	452	25	0	0	0	0	0	0	0
3. Housing Allocations Above 5 ha (ST Sites)																								
ST1a	British Sugar/Manor School	1100													50	150	150	150	150	150	150	150		
ST1b	Manor School	100														35	35	30						
ST2	Former Civil Service Sports Ground Millfield Lane	123									60	46	17											
ST4	Land Adj. Hull Road and Grimston Bar	162											17	50	50	45								
ST5	York Central	2500													500	499		501		136			450	414
ST7	Land East of Metcalfe Lane	845													50	90	120	120	120	120	120	105		
ST8	Land North of Monks Cross	970											50	100	100	100	100	100	100	100	100	100	20	
ST9	Land North of Haxby	700												45	90	90	90	90	90	90	90	25		
ST14	Land to West of Wigginton Road	1348												60	60	160	160	160	160	160	160	160	108	
ST15	Land to West of Elvington Lane	3339												50	75	160	200	200	200	200	240	240	240	1534
ST16	Terrys Extension Site - Terrys Car park (Phase 2)	38												38										
ST17	Nestle South (Phase 2)	267									64	0	61	127	15									
ST31	Land to the South of Tadcaster Road, Copmanthorpe	140									17	42	46	35										
ST32	Hungate	613											196		221		196							
ST33	Station Yard Wheldarke	139									10	30	30	30	30	9								
ST36	Imphal Barracks, Fulford Road	769															100	100	100	100	100	100	100	169
Annualised Projected Completions for ST Sites											151	118	417	535	1241	1338	1051	1451	920	1056	960	880	918	
4. Projected Housing Completions From Non Allocated Unimplemented Consents (Inclusive of																								
Total		2007									414	487	406	444	90	61	35	35	35					
5. Projected Housing Completions From Communal Establishments/Student Accommodation																								
Total		107									19	0	0	88	0	0	0	0	0	0	0	0	0	0
Supply Trajectory																								
Actual Net Completions (2017 to 2025)			1331	451	627	643	660	851	465	712														
Projected Completions (all sites)											721	709	903	1356	1828	1851	1111	1486	955	1056	960	880	918	
Windfalls											0	0	0	196	196	196	196	196	196	196	196	196	196	
Projected Annual Housing Completions (Inc Windfall Allowance)											721	806	1066	1552	2024	2047	1307	1682	1151	1252	1156	1076	1114	
Cumulative Completions (Including Windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6461	7267	8333	9885	11909	13956	15263	16945	18096	19348	20504	21580	22694	
Over/Under Supply			509	138	-57	-236	-398	-369	-726	-836	-937	-953	-709	21	1223	2448	2933	3793	4122	4552	4886	5140	5432	
Detailed Trajectory (including 10% Non-Implementation (NI) Rate)																								
A. Projected Completions (all sites) - 10% NI Applied											649	638	813	1220	1645	1666	1000	1337	860	950	864	792	826	
B. Windfall Allowance														196	196	196	196	196	196	196	196	196	196	
C. Projected Annual Completions (A + B) + Actual completions 2017-2025			1331	451	627	643	660	851	465	712	649	638	813	1416	1841	1862	1196	1533	1056	1146	1060	988	1022	
D. Cumulative Annual Completions (10% NI applied and windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6389	7027	7840	9256	11097	12959	14155	15689	16744	17890	18950	19938	20961	
E. Annual requirement			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822
F. Cumulative Annual Requirement			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152	13974	14796	15618	16440	17262	
G. Over/Under Supply (D - F)			509	138	-57	-236	-398	-369	-726	-836	-1009	-1193	-1202	-608	411	1451	1825	2537	2770	3094	3332	3498	3699	
5 Year Housing Land Supply Position																								
H. 5 year requirement (822 * 5)										4110	4110	4110	4110	4110	4110	4110	4110							
I. Shortfall to be carried over remaining plan period (absolute value of G)										836	1009	1193	1202	608										
J. Shortfall within 5 years (5 x (G + remaining plan period)) (Liverpool)										523	721	994	1202	608										
K. 20% Buffer (0.2 x (H + J))										927	966	1021	1062	944	822									
L. 5% Buffer (0.05 x H)																206	206	206						
M. Rolling Total Five Year requirement (H + J + buffer)										5559	5797	6125	6374	5662	4932		4316	4316						
N Rolling Five year land supply (from row C)										5357	6570	7128	7849	7488	6793	5991	5783	5272						
O. Over/under Supply (with NI applied) against total 5 year requirement (N - M)										-202	773	1003	1474	1826	1861	1676	1468	957						
Annual requirement with buffer										1112	1159	1225	1275	1132	986	863	863	863						
P. Land supply in Years (no account for previous oversupply)										4.82	5.67	5.82	6.16	6.61	6.89	6.94	6.70	6.11						

From: Jo Ann Mellor [REDACTED]
Sent: 12 August 2025 10:33
To: localplan@york.gov.uk
Cc: Neil Jones
Subject: City of York Council- CIL Statement of Modifications consultation July / August 2025
Attachments: CYC - CIL Consultation July 2025 - Reps August 2025 - signed.pdf; CIL representations March 2023(1.0).pdf; Letter to City of York Council NJ 26.01.2024.pdf - signed.pdf
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Sent on behalf of Neil Jones

Good Morning

Please find attached letter of representations together with two previous letters.

Kindly acknowledge receipt of the attached.

Kind regards

Jo Ann Mellor

Jo Ann Mellor

Team Assistant & Manchester Office Manager

Rapleys LLP



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Strategic Planning Policy
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By email only to localplan@york.gov.uk

Our ref NJ/1119/114/3

12 August 2025

Dear Sir / Madam

City of York Council – Draft Community Infrastructure Levy Charging Schedule – Statement of Modifications Consultation July / August 2025 – Representations on behalf of British Sugar Plc

We write on behalf of our client, British Sugar Plc, to submit representations to the Statement of Modifications Consultation in relation to the draft CIL charging schedule.

British Sugar remains committed to facilitating the redevelopment of the British Sugar site and continues to work closely with officers at City of York (CYC) accordingly.

The background and current planning framework for the British Sugar site was set out in our previous representations of 27 March 2023 and January 2024 (both enclosed).

Since that time, British Sugar has obtained further approval for a 's73' permission for the British Sugar site (ref 23/02302/FUL) which approves minor amendments to the outline masterplan permission at the site, to enable its onward delivery. British Sugar now intends to progress the further remediation and reclamation work at the site later this year, and will shortly be submitting the Phase 1 Reserved Matters application, which relates to the strategic infrastructure and open space items, for approval by the Local Planning Authority.

In addition, the Council adopted its Local Plan in Feb 2025, which includes Strategic Policy SS6 (Former British Sugar Site / Manor School), identifying the combined site (Site Ref ST1) as a Strategic Housing Site for the delivery of 1,200 homes (see policy extract below). Importantly, in the context of the draft CIL, adopted Policy SS6 specifically requires that the site must be masterplanned and delivered in accordance with the key principles set out in the policy, which includes the delivery of social infrastructure items as part of the development (and, in this regard, the s106 agreement associated with the extant on-site permissions addresses the majority of these matters, notwithstanding that we note that some of them could be caught by the provisions of the draft CIL schedule).

Policy SS6: British Sugar/Manor School

British Sugar/Manor School (ST1) will deliver approximately 1,200 dwellings at this urban development site. In addition to complying with the policies within this Local Plan, the site must be master planned and be delivered in accordance with the following key principles:

- i. Provide new social infrastructure which meets the needs of future residents of ST1 and, where viable, surrounding communities, including local retail, health, community space, educational facilities and sports provision.
- ii. Provide appropriate education provision subject to detailed viability and deliverability work as part of site masterplanning.
- iii. Be of a high design standard to give a sense of place and distinctive character reflecting the site's historic use and social heritage. The site has views across the flat landscape toward the Minster and northwest, which need to be incorporated through the design to ensure views are achieved across the flat landscape.
- iv. Create linked multi-functional green infrastructure including existing landscaped areas to maximise linkages to the wider green infrastructure network. The site contains the 'British Sugar Sidings' Site of Importance for Nature Conservation (SINC) bordering the railway line. Significant buffering would be required to ensure the integrity of this nature conservation site. This could be incorporated into the green infrastructure scheme on site.
- v. Deliver new and improved green infrastructure to meet the needs for formal and informal recreation and leisure use. The site is part of the Acomb/River Ouse green infrastructure corridors and will require substantial natural open space. A tree survey will be required with particular reference to mature trees along Boroughbridge Road frontage.
- vi. Create a framework of public realm/spaces/routes to encourage pedestrian and cycle movements into and through the site.
- vii. Optimise integration, connectivity and access through the provision of new pedestrian, cycle, public transport and vehicular routes to ensure sustainable movement into, out of and through the site.

In terms of the consultation on the proposed modifications to the draft charging schedule, we **strongly object** to the modifications set out in the Statement of Modifications, as they relate to the British Sugar site (Modification No 3). The reasons for this objection are set out below.

The previous version of the Draft Charging Schedule (December 2023), in effect, included the British Sugar Site (Strategic Site ST1) within the strategic sites to which the £200 per sq m CIL rate would be applicable.

Our previous representations set out the reasons for objection to this position, and the clear justification for the inclusion of the British Sugar site within the list of strategic sites to which the £0 per sq m CIL rating should apply.

Our previous representations have not however been reflected in the revised draft charging schedule July 2025.

Rather, the British Sugar Site (ST1) is now included specifically within the list of sites to which the £100 per sqm CIL rating should apply. Whilst it is recognised that this is lesser amount than that required by the previous draft schedule, this is still not considered to be appropriate or justified.

This is because, as set out in our representations of March 2023 and January 2024, there was no evidence contained within the CIL Viability Study or CIL Viability Study Addendum Nov 2023 to support either the £200 or £100 per sq m rate proposed. The further CIL Viability Study Addendum July 2025, which forms part of this latest consultation, also contains no viability

evidence relating to the British Sugar site (or any 'typology' equivalent to the scale and nature of the British Sugar site) that supports or justifies the now proposed £100 per sq m rate.

Officers have confirmed in previous correspondence (at the time of our Jan 2024 representations) that they recognise that the viability position at the British Sugar site (as referenced in our March 2023 representations) would mean that an 'exceptional circumstances' case could apply in respect of the application of the CIL rate in the future. Whilst it is accepted that there are 'transitional arrangements' in place for pre-CIL permissions, it may nevertheless be the case that further amendments to the existing permissions, or indeed fresh full permissions, may become necessary to ensure the further implementation and completion of the development at the British Sugar site. Such permissions could therefore become CIL liable. As such, reliance on a potential future exceptional circumstances case is not considered to represent a justified or evidenced based approach to the preparation of the CIL charging schedule, as it relates to the British Sugar site.

Specifically, therefore, we reiterate and reaffirm our previous representations made in March 2023 and Jan 2024, as follows:

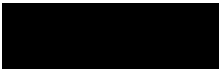
- The British Sugar site has not been specifically assessed within the CIL viability study (or the addendums), unlike other strategic sites.
- The site-specific viability assessments of the British Sugar site that have been undertaken for the Council previously (by Peter Brett and Porter Economics) were 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 are pre-CIL permissions, the British Sugar development will not be CIL liable).
- Despite not including any site-specific assessment of the British Sugar site, it is now specifically including in the revised draft charging schedule as a site which would be subject to a CIL rate of £100 psm. There is no evidence contained within the CIL viability study or addendums to support this approach. Indeed, as demonstrated in our March 2023 representations, the evidence on site preparation costs at the British Sugar site identifies that there would be no headroom to viably provide for CIL.
- Moreover, the justification for the identified £0 rated 'exception' strategic sites in the draft charging schedule applies equally 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 providing significant social infrastructure to the benefit of the City via a committed package of s106 obligations and contributions. The cited reasons for exception at other sites are therefore clearly and equally applicable to the British Sugar site.

In addition to the above, as already identified, the Council has recently adopted its Local Plan, which includes the British Sugar site within Strategic Housing allocation SS6. This adopted policy specifically requires the delivery of a range of identified infrastructure items for the benefit of the community as part of the development. These required infrastructure items include educational facilities, sports provision, green infrastructure, public transport and connectivity improvements. These items are included in the identified list of items on which CIL funds can be spent (see Section 10 of the Council's CIL Consultation Information Booklet Feb 2023). In this respect, it is considered that the allocated policy specifically identifies and requires the community infrastructure provision that is necessary in association with the development of the British Sugar site, and which would be applied to any future planning applications. Consequently, there is no requirement for the site to also be specifically included within the CIL charging schedule, and

indeed to do so could lead to the principle of double counting, if CIL payments are to be required in addition to the infrastructure provision required by the adopted policy.

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' which are identified as having a £0 per sqm CIL rate in the draft charging schedule. The British Sugar site ST1 should therefore be included within this list of 'exception sites' and we trust these representations will be fully taken into account in the further preparation of the CIL charging schedule. We reserve the right to make further comment as necessary. As such we will be making arrangements to appear at the CIL examination hearing.

Yours faithfully



Neil Jones

BA (Hons) DipTP MRTPI AssocRICS

Consultant - Town Planning



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Our ref NJ/1119/114/3
Date 26 January 2024

Dear Sir / Madam

City of York Council – Community Infrastructure Levy (CIL) Draft Charging Schedule – Proposed Modifications December 2023 – Representations on behalf of British Sugar Plc

We write on behalf of our client, British Sugar Plc, to submit representations to the above consultation on the proposed modifications to the CIL draft charging schedule.

British Sugar remains committed to facilitating the redevelopment of the British Sugar site and continues to work closely with officers at City of York (CYC) accordingly.

The background and current planning framework for the British Sugar site was set out in our previous representations of 27 March 2023 (enclosed). Since that time, British Sugar has submitted a further 's73' application for the British Sugar site (ref 23/02302/FUL) which seeks approval for minor amendments to the approved outline masterplan permission at the site, to enable its onward delivery.

In terms of the consultation on the proposed modifications to the draft charging schedule, we **strongly object** to the proposed modifications. The reasons for this objection are set out below.

The previous version of the Draft Charging Schedule (December 2022), in effect, included the British Sugar Site (Strategic Site ST1) within the strategic sites to which the £100 per sq m CIL rate would be applicable.

Our representations of March 2023 set out the reasons for objection to this position, and the clear justification for the inclusion of the British Sugar site within the list of strategic sites to which the £0 per sq m CIL rating should apply.

Our previous representations have not however been reflected in the revised draft charging schedule.

Rather, following correspondence with officers in the Strategic Policy Team to clarify the potential application of the revised draft charging schedule to the British Sugar site, it is understood that future applications and development on the site could be subject to the £200 per sq m rate identified for residential dwellings, given that the site is not specifically identified as one of the strategic sites that benefits from the lower ratings.

In effect therefore, the CIL rate that could be applied to future residential development at the British Sugar site has doubled since the December 2022 consultation, to £200 per sq m, as a result of the proposed modifications to the draft charging schedule currently being consulted on.

However, as set out in our representations of March 2023, there was no evidence contained within the CIL Viability Study at that time to support the £100 per sq m rate proposed, and there is no assessment or evidence contained within the CYC CIL Viability Study Addendum Nov 2023 (the evidence base document used to justify the revised draft charging schedule) that supports the doubling of the CIL rate applicable to the British Sugar site.

Officers have confirmed in recent correspondence that they recognise that the viability position at the British Sugar site (as referenced in our March 2023 representations) would mean that an 'exceptional circumstances' case could apply in respect of the application of the CIL rate in the future. However this is not considered to represent a justified or evidenced based approach to the preparation of the CIL charging schedule as it relates to the British Sugar site.

Specifically therefore, we reiterate our representations made in March 2023, as follows:

- The British Sugar site has not been specifically assessed within the CIL viability study (or the addendum), 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, the British Sugar development 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 existing 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, it is by default included in the revised draft charging schedule as a site which would potentially be subject to a CIL rate of £200 psm. There is no evidence contained within the CIL viability study or addendum to support this approach. Indeed as demonstrated in our March 2023 representations, the evidence on site preparation costs at the British Sugar site identifies that there would be no headroom to viably provide for CIL.
- Moreover, the justification for the identified £0 rated 'exception' strategic sites in the draft charging schedule applies equally 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. The cited reasons for exception at other sites are therefore clearly and equally applicable to the British Sugar site.

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' which are identified as having a £0 per sqm CIL rate in the draft charging schedule. The British Sugar site ST1 should therefore be included within this list of 'exception sites'.

We trust these representations will be fully taken into account in the further preparation of the CIL charging schedule. We wish to be notified of any future updates to the draft CIL by the Council and wish to reserve the right to participate in the CIL examination.

In addition, at the time of writing we are awaiting a further response from the Strategic Policy Team in relation to our recent correspondence regarding this consultation. On this basis, we reserve the right to amend our representations, or make further comment, following receipt of this response, post the consultation deadline of 31st January 2024, as necessary.

Yours faithfully



Neil Jones

BA (Hons) DipTP MRTPI AssocRICS
Consultant - Town Planning









Letter to City of York Council NJ 26.01.2024.pdf

Final Audit Report

2024-01-26

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Alison Stockdale
Principal Strategic Planning Policy Officer
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By email only to localplan@york.gov.uk

Our ref: NJ/1119/114/3

Date: 27 March 2023

Dear Alison

**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,

A black rectangular redaction box covering the signature of Neil Jones.

Neil Jones

BA (Hons) DipTP MRTPI AssocRICS

A black rectangular redaction box covering the contact information of Neil Jones.

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 significant 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 Alison Stockdale NJ 27.03.2023

Final Audit Report

2023-03-27

Created:	2023-03-27
By:	Jo Ann Mellor [REDACTED]
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 Agreement completed.

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From: Eamonn Keogh [REDACTED]
Sent: 15 August 2025 19:01
To: localplan@york.gov.uk
Cc: Tim Ross
Subject: City of Yorks CIL statement of modifications Consultation - Representations on Behalf of Fusion York Devco Limited
Attachments: yfb2508.Fusion CIL reps Submit.pdf; CYC Revised CIL DCS Mods Consultation 2025 - Fusion Representation (CBRE 15.08.25).pdf
Follow Up Flag: Follow up
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Dear sir/ madam,

Please find the attached representations on behalf of Fusion York Devco Limited in response to the Council's CIL Statement of Modifications Consultation

Attached submission includes:

- 1) Over arching representation prepared by O'Neill Associates
- 2) Technical representation prepared by CBRE

Contact details set out below and within the submission.

Kind regards

Eamonn

O'Neill Associates

Eamonn Keogh [REDACTED]
[REDACTED]

www.oneill-associates.co.uk

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Chartered Town Planning Consultants

City of York Council
CIL Statement of Modifications Consultation
15 July 2025

Response on behalf of Fusion York Devco Limited (Fusion Group)

INTRODUCTION

- i. These representations are submitted in response to:
 - a. the consultation on the Statement of Modifications, Revised draft CIL Charging Schedule, and City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.
 - b. they should be read in conjunction with previous representations made on behalf of Foss Argo Developments Limited in response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023; and the representations made by Fusion Group to the consultation on the revised draft CIL Charging Schedule (as amended on the 21 December 2023) and CIL Sensitivity Test Viability Report Errata Addendum (published 21 December 2023)
- ii. ***This representation is supported by and should be read in conjunction with the Technical Representation prepared by CBRE and submitted with this representation.***
- iii. ***Fusion Group requests to be heard at the examination of the City of York's CIL Charging Schedule, as an independent stakeholder organisation, and to be notified by the Council/ programme coordinator of all future events and proceedings. The notification should be provided to O'Neill Associates.***

Purpose Built Student Accommodation

- iv. It is Fusions view that the CIL charging schedule for off campus PBSA at £150/m² would:
 - Impact on the viability of future schemes for student housing, to the detriment of the growth of the City's two Universities as supported by draft Local Plan policies ED1, ED4 and ED7;

- Impact on the rents that would need to be charged to the detriment of students' finances and the Universities' policies on inclusivity;
 - Impact on the Council's economic strategy to which the Universities contribute by providing high quality educational opportunities and the positive GVA contribution to the local economy;
 - Compromise the contributions to affordable housing (sought through Policy H7 of the Loca Plan) and other contributions e.g. towards open space, as the only negotiable elements of the financial obligations to be imposed on PBSA development.
- v. Fusion's position is that if there is any headroom available from off campus PBSA development, that this should be directed towards providing affordable student accommodation, in the form of on-site discounts to rental rates to students. This could be agreed in conjunction with the Universities.

Residential Dwellings

- vi. In general terms, the CIL charging schedule threatens the delivery of housing and is contrary to objectives of the emerging local plan and City of York 'One City, for All' Council Plan 2023-2027.
- vii. The proposed £150/m² flat residential CIL rate—excluding certain strategic allocation sites—would be the highest in Yorkshire. By contrast, other authorities adopt zone-based rates to reflect local market values:
- Leeds: £7.55, £34.72, £67.93, or £135/m² (index-linked)
 - Sheffield: £0, £46.18, £76.97, or £123.15/m² (index-linked)
- viii. York's blanket rate ignores value variation and disproportionately impacts lower-value areas, as well as sites with significant development constraints/ risk requiring costly mitigation.

Housing delivery

- ix. The proposed CIL levy's must be considered in the context of the acknowledged poor delivery of housing in the city over a long run period. The Council's *Annual Housing Monitoring Update* (July 2025) shows that by the local plan's halfway point, only 5,740 dwellings had been delivered - 836 short of the number needed to be on track.
- x. Table 2.9 below from the Councils Annual Housing Monitoring Update 2025, indicates that at face value, the Council met the Local Plan housing requirement in 6 of the first 8 years of the Plan. However, in the two years where the Local Plan requirement was exceeded, 2017/18 and 2022/23, PBSA completions contributed 637 and 232 units respectively. When these are excluded, it is evident that there has been a dramatic failure in the delivery of C3 housing in the first 8 years of the 15-year plan period. While National Planning Guidance

allows Councils to consider PBSA units in housing completions, imposing a CIL charge will constrain such delivery, thus keeping “housing” completions in York suppressed.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Table 2.9: Summary of data between 1 April 2015 to 31 March 2025

Year	Completions	New Build	Net Conversions/ COU	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain	Communal Establishments	Overall net gain in Local Plan period
2015-2016	1171	908	219	1	218	6	1121		
2016-2017	996	420	564	21	543	7	977		
2017-2018	1336	1111	195	12	183	10	1296	35	1331
2018-2019	481	299	155	18	137	5	449	2	451
2019-2020	596	437	134	11	123	11	560	67	627
2020-2021	643	469	159	14	145	6	622	21	643
2021-2022	419	350	58	18	40	6	402	258	660
2022-2023	494	411	55	1	54	7	459	392	851
2023-2024	569	390	146	3	143	8	528	-63	465
2024-2025	675	395	262	4	258	8	649	63	712
Local Plan delivery 2017-2025	5213	3862	1164	81	1083	61	4965	775	5740
10 year delivery 2015-2025	7380	5190	1947	103	1844	74	7063		

Green Belt/ Grey Belt

- xi. The Council has failed to consider the effect of the proposed CIL charging schedule of potential Grey Belt sites, which national policy recognises as an important source of housing land. York is likely to depend on these sites to meet both overall housing and affordable housing targets. However, many Grey Belt sites delivering family housing with high affordable content also face substantial S106 education contributions—driven by child yield assumptions—which can vary significantly in scale.
- xii. When these S106 obligations are combined with a £150/m² CIL rate, the result is a serious threat to scheme viability, particularly for the very developments the Local Plan seeks to promote.
- xiii. This runs counter to the NPPF requirement to significantly boost housing supply. York is already falling far short of its Local Plan housing targets after more than a decade of undersupply. A charging schedule that imposes the highest rate in the region, without sensitivity-testing realistic policy and s106 contribution scenarios, risks suppressing both market and affordable housing delivery—undermining the objectives of the adopted Local Plan and the *One City, for All* Council Plan (2023–2027).

- xiv. 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.

Affordable Housing delivery

- xv. The Local Plan requires that at least 45% of the city's identified need for 9,396 affordable dwellings is met during the plan period. This equates to 4,228 affordable homes, or an average of 264 per year. The Council's *Annual Housing Monitoring Update* (July 2025) paints a stark picture: every year since the Local Plan period began, affordable housing delivery has fallen well short of the adopted local plan target. By the plan's halfway point, only 993 affordable dwellings had been delivered - less than half of the 2,114 needed to be on track. At the current pace, York will deliver just 1,986 affordable homes by 2032/33 - meeting only 21% of the identified need, and missing the Local Plan's affordability commitment by a wide margin. This shortfall risks deepening the city's housing crisis, leaving thousands of residents without access to the secure, affordable homes they need.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Affordable housing completions

- 2.19 During the course of the monitoring year, 129 affordable homes were completed. Over the duration of the plan period so far (2017-2015) a total of 993 affordable dwellings have been completed.
- 2.20 The housing mix in relation to delivery over the last year and over the monitoring period mirror each other with the majority of completions shown to be 1/2 bedroom flats followed by 2/3 bedroom houses¹⁰.

Table 2.12: Affordable Housing Completions – Housing Mix

Year	1-bed flat	2-bed flat	1-bed house	2-bed house	3-bed house	4-bed house	Total
2017/18	25	32	0	6	10	1	74
2018/19	5	24	2	14	15	0	60
2019/20	31	47	5	18	16	7	124
2020/21	41	27	6	29	22	5	130
2021/22	68	57	0	40	44	10	219
2022/23	38	0	0	32	42	9	121
2023/24	11	26	0	61	33	5	136
2024/25	37	34	0	26	27	5	129
Total 2017-2025	256	247	13	226	209	42	993
% split for 2024/25	29%	26%	0	20%	21%	4	100%
% split over 2017-2025	26%	25%	1%	23%	21%	4%	100%

¹⁰ "Houses" includes a small number of bungalows.

- xvi. In practical terms what this means is that where a residential or PBSA 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 and 'One City for all: Council Plan' which will be severely threatened by the introduction of the draft CIL Charging Schedule.

- xvii. A good example of how this scenario plays out is provided by the Icona2 scheme on Eboracum Way, York. Planning permission for the 62-apartment scheme was approved in May 2020 (Ref.19/01467/FULM). Section 106 contributions totalling £2,058,921 were agreed, including a £1,940,302 for affordable housing. However, after construction had started abnormal and materials costs increased, and major sub-contractors went into liquidation. In October 2022 the developer sought to reduce the Section 106 contributions to £1million and the Council agreed. The reduction in the affordable housing contribution was £1,058,921. A copy of the relevant planning committee report is included at Appendix 1.
- xviii. This is a perfect example of how difficulties encountered in development impact on viability and the need to ensure development schemes have a robust contingency in their appraisal.

S106 Contributions

- xix. Current S106 education contributions—driven by high child yield assumptions—are highly variable (as shown in the table extract below) and, when combined with a £150/m² CIL rate, risk making family and affordable housing schemes unviable.
- xx. The CIL evidence base must **sensitivity-test** realistic education contribution scenarios to avoid a charging schedule that inadvertently blocks the very schemes the Local Plan seeks to deliver.

Below – Extract from City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.

Table 4.13 Policy DM1/s106 costs per unit tested in this Addendum

Site	S106	Supplementary Education	Other key Infrastructure	Total cost	Cost per unit
Not Strategic Site specifics	£3,208,800	£3,112,461	£0	£6,321,261	£8,274
SS8 Land Adj Hull Road (ST4)	£886,200	£1,054,611	£1,000,000	£3,419,116	£13,000
SS9 Land East of Metcalf Lane (ST7)	£3,549,000	£9,992,240	£2,500,000	£16,041,240	£18,984
SS10 Land Nth of Monks Cross (ST8)	£4,065,600	£15,274,420	£3,000,000	£22,340,020	£23,079
SS11 Land Nth of Haxby (ST9)	£3,087,000	£12,955,738	£2,000,000	£18,042,738	£24,548
SS12 Land West of Wigginton Rd (ST14)	£5,661,600	£21,568,055	£11,900,000	£39,129,655	£29,028
SS13 Land West of Elvington Lane (ST15)	£14,023,800	£52,300,000	£74,900,000	£141,233,800	£42,295
SS14 Terry's Extension Sites (ST16)	£466,200	£0	£0	£466,200	£4,200
SS16 Land at Tadcaster Rd (ST21)	£663,600	£1,210,685	£0	£1,874,285	£11,863
SS18 Station Yard, Wheldrake (ST33)	£630,000	£1,777,059	£0	£2,407,059	£16,047
SS20 Imphal Barracks (ST36)	£3,229,800	£9,093,293	£0	£12,323,093	£16,025

Source: CYC, Key Infrastructure Requirements Updated Gantt [Exam doc: EX/CYC/70]

- xxi. The lack of sensitivity testing is highly concerning and undermines the robustness of the evidence base to justify such a high CIL rate compared to other areas in the Yorkshire region. 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.
- xxii. The reality and specific context of developing in York have not been properly considered. This is particularly pertinent within the context of a brownfield first context which is the thrust of the recent national policy statements, and the Local Plan spatial strategy. 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.
- xxiii. Securing the long- term future of York's heritage for future generations is a key objective of the emerging local plan, and the NPPF. The draft CIL charging schedule would prevent such development because it would not be viable. Both PBSA and residential accommodation above shops makes an important contribution to housing supply but its delivery is seriously threatened by the draft CIL charging schedule.
- xxiv. A more sophisticated approach to the proposed rates would be setting a distinct city centre zone given the city centre commands 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, the extremely high concentration of listed buildings, and most is high

flood risk. The rest of the city commands lower values but lower development costs (typically).

- xxv. Without CIL relief (e.g. 'zero' rated) for conversion and upward extension of listed buildings the draft CIL charging schedule threatens the restoration and long-term future of York's heritage, and comprehensive regeneration schemes in the city centre.
- xxvi. The adopted local plan's policy requirements for most developments, particularly major developments 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 City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.
 - i. 75% carbon reduction aspirations – policy CC2 (modification) (this is considered within CIL Viability study)
 - ii. 10% Biodiversity net gain (this is considered within CIL Viability study)
 - iii. Accessible Housing Standards (this is considered within CIL Viability study)
 - iv. Archaeology – much of the city centre is within an archaeology area of importance which, taken on its own, gives rise to considerable risk, delay and development costs
 - v. 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.
 - vi. Changes to policy H7 and the requirement for nominations agreements.
 - vii. Air Quality assessments/mitigation for all major applications
 - viii. 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.

- ix. 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.
- x. Travel Plan obligations e.g. car clubs, free bus travel, cycle equipment contributions, travel plan coordinator.
- xi. 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.
- xii. For example, draft local plan policy G16 seeks on-site open space provision for all residential developments, except in exceptional circumstances or for small sites. The amenity open space requirement is typically around 40.5sqm per bedroom depending of the level of local open space deficit (by electoral ward) – this spatial requirements is set out in the 2017 open space & GI update

https://www.york.gov.uk/downloads/file/14274/open_space_and_green_infrastructure_update_2017.

- xiii. Cumulatively, the requirement for 40.5sqm per bedroom has significant implications for the viability of proposals, particularly large city centre schemes. A significant proportion of land within a development site would have to be given over to open space. This requirement does not seem to have been properly considered as part of the Council's draft CIL charging schedule evidence.

Summary

- xxvii. The Technical Representation document prepared by CBRE sets out the substantive points of the Fusion representation. In summary:

- Fusion cannot endorse or support the Revised CIL DCS, and its underpinning evidence base in the form of the CIL Viability Addendum 2025, as presently published.
- Fusion 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 and residential use development within the Revised CIL

DCS is reliant, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.

- In light of above Fusion does not accept the validity and reliability of the published viability evidence base upon which the proposed off-campus PBSA and residential charging rates within the Revised CIL DCS relies, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.
- To rectify the issues identified, Fusion advocate that the CIL rates proposed to apply to off campus PBSA development and residential development should be reduced to £0/m² via modification to the published Revised CIL DCS or CYC's pursuing of a CIL regime altogether held in abeyance until economic and property market conditions demonstrably improve.

Appendix 1

Icona 2

Renegotiation of Section 106 Contributions
Planning Committee Report

COMMITTEE REPORT

Date: 5 October 2022 **Ward:** Guildhall
Team: East Area **Parish:** Guildhall Planning Panel

Reference: 19/01467/FULM
Application at: Vacant Site Eboracum Way York
For: Erection of 5 storey apartment building with basement comprising 62 residential units (Use Class C3), associated car parking and landscaping works.
By: Tiger Developments Limited
Application Type: Major Full Application
Recommendation: Approve variation to Section 106 Agreement

1.0 Introduction

1.1 The scheme, for residential development of the site was considered at planning committee 11 February 2020 and approved in May 2020. The s106 Agreement dated 20th May 2020 (as varied by the Deed of Variation dated 1st December 2020) contained a policy compliant affordable housing obligation of 20% (in accordance with policy H100 of the Publication Draft Local Plan 2018). The contributions were as follows –

Education

£54,711 to be used at Tang Hall Primary (reconfiguration to increase capacity)

£24,987 to be used at Archbishop Holgate (extension to increase capacity)

Open space

£7,138 to be used at Monk Bridge Gardens to improve accessibility

Off-site sports provision

£19,383 to be used at Glen Gardens to improve tennis, basketball and bowling green facilities.

Car club

First occupants to be offered £200 towards membership/use (£12,400)

Affordable housing contribution

£1,940,302

Total contribution:

£2,058,921

1.2 The site was sold by applicants following the granting of permission.

Application Reference Number: 19/01467/FULM

Item No: 3a

1.3 This report is brought to planning committee due to viability issues in delivering the scheme. The scheme is under construction however construction has stalled.

1.4 The construction period has become prolonged, initially due to a lack of agreement over the preferred method of construction using the land to the north. Abnormal costs have increased significantly to the extent that the scheme is no longer viable.

1.5 The developer is still willing and able to offer a contribution of £1m towards planning obligations. The initial S106 agreement had a planning obligation of an overall value of £2,058,921.

1.6 The construction and abnormal costs have been independently reviewed by Quantity Surveyors and a fresh viability appraisal undertaken by the District Valuer. The viability appraisal, by the District Valuer, concludes that the scheme is not viable and recommends to the Council that the £1m contribution offered is reasonable.

1.7 The officer recommendation to members is that delegated authority be granted to officers for the s106 agreement to be varied accordingly. This would secure £1m in planning obligations. The recommendation is the affordable housing obligation be reduced accordingly; to £881,471.

2.0 Assessment

Policy context

2.1 The NPPG advice is that planning obligations can be renegotiated at any point, where the local planning authority and developer wish to do so. Where there is no agreement to voluntarily renegotiate, and the planning obligation is over 5 years old, an application may be made to the local planning authority to change the obligation

2.2 The weight to be given to a viability assessment is a matter for the decision maker. In respect of a review following planning, which is unusual, the NPPG advises that as the potential risk to developers is already accounted for in the assumptions for developer return in viability assessment, realisation of risk does not in itself necessitate a further viability assessment or trigger a review mechanism.

2.3 The NPPG acknowledges that in considering viability in decision-making changes in site circumstances are relevant including abnormal costs, which include those associated with treatment for contaminated sites, or costs associated with brownfield, phased or complex sites. Also, relevant is circumstances where a recession or similar significant economic changes have occurred.

Appraisal

2.4 Viability discussions initially commenced in late 2020 as the developer was unable to gain access to the land to the north of the site, meaning only the application site and the highway could be used for construction. This has had a significant impact on the programme of works, leading to a prolonged construction period and subsequently increased costs. The delay to the construction period now stands at 14 months. Subject to no further delays completion could be May / June 2023.

2.5 During the construction period materials costs have increased, to the extent which independent quantity surveyors have advised are reasonable in the current market. Two major sub-contractors have gone into liquidation, renegotiations with others has increased costs. There has also been dispute between developer and main contractor. This has lead to a revised (higher) contract sum. Costs have increased although not to the extent that would have occurred if different contractors were engaged.

2.6 There have been various other extra costs incurred, related to the stability of the boundary wall, unexpected contamination and consultant fees. However, the significant items relate to the delay in construction and costs for materials and contractors. It is also noted that car parking for the residential scheme (which is to be provided in the building at lower ground level), deemed necessary by Highway Network Management, is detrimental to viability.

2.7 As a consequence, the increased costs, referred to as abnormal costs in the viability review, are approximately £3m in excess of the construction costs when the viability of the scheme was first reviewed. These costs have actually been incurred and evidenced by the developer.

Land value

2.8 The NPPG advises that under no circumstances will the price paid for land be relevant justification for failing to accord with relevant policies. The land value used by the District Valuer for the viability appraisal acknowledges the complexity of the site and is significantly less than what the developer paid for the site. The viability appraisal is on the basis of a nominal value for the site.

2.9 The NPPG guidance advises that land value – benchmark land value should -

- be based upon existing use value
- allow for a premium to landowners (including equity resulting from those building their own homes)
- reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees

2.10 The viability appraisal applies a benchmark land value of £250k.

Developer profit

2.11 The NPPG guidance advises a profit of 15-20% of gross development value (GDV) may be considered a suitable return to developers. The increased construction costs mean the developer profit is at around 8% if the planning obligation is reduced to £1m. Developer profit is now below the normal threshold i.e. under the viability guidance in the NPPG the scheme is unviable if planning obligations are required. The previous viability assessments undertaken (prior to increased construction costs) had showed the scheme was able to provide the requested planning obligation and still make a reasonable profit of 17.5%.

3.0 Recommendation

3.1 The developer can afford to provide £1m in planning obligations, although, based on the viability, developer profit is below the normal threshold. In reality the profit is lower, because of the price paid for the site. This compromise would allow for retention of the current contractor and finance to complete the scheme. Officer recommendation is to vary the s106 agreement to secure a £1m planning obligation, rather than the original £2,058,921.

Broken down as follows:

Education

£54,711 to be used at Tang Hall Primary (reconfiguration to increase capacity)

£24,987 to be used at Archbishop Holgate (extension to increase capacity)

Open space

£7,138 to be used at Monk Bridge Gardens to improve accessibility

Off-site sports provision

£19,383 to be used at Glen Gardens to improve tennis, basketball and bowling green facilities.

Car club

First occupants to be offered £200 towards membership/use (£12,400)

Affordable housing

£881,381

The total loss off affordable housing contribution would be £1,058,921

3.2 This follows the recommendation from the district valuer who has carried out an independent viability review on the scheme based on verified incurred construction costs.

3.3 The risk associated with not proceeding with the s106 variation is that the residential development scheme stalls for an unknown period of time. The banks would likely repossess the site and pursue a more profitable scheme i.e. student accommodation or an apartment type hotel (which would fit within the approved building envelope). This scenario has been confirmed by the applicant. These alternatives would not make the same contribution to local housing need and would incorporate zero affordable housing contribution.

Contact details:

Case Officer: Jonathan Kenyon



City of York CIL Statement of Modifications Consultation

Technical representation prepared by CBRE UK Ltd on behalf of:

Fusion York Devco Ltd

August 2025

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Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by Fusion York Devco Ltd ('Fusion'), which has 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') Statement of Modifications ('SoM') consultation ('the consultation').
2. CBRE's technical representations focus upon the evidence base underpinning the CYC CIL DCS Proposed Modifications – specifically the City of York CIL Viability Addendum ('CIL Viability Addendum') produced by Porter Planning Economics ('PPE') and dated June 2025.
3. An overarching representation has been prepared by York-based town planning consultancy O'Neill Associates.

The Consultation

4. CYC has published the following documents:
 - Draft CIL Charging Schedule (June 2025)
 - Statement of Modifications (June 2025)
 - Notice of Submission (June 2025)
 - Consultation Statement (June 2025)
 - CIL Consultation Spring 2023 Representations
 - CIL Consultation Winter 2023 Representations
 - CIL Viability Assessment Update (June 2025)
 - CIL Sensitivity Test Viability Report (November 2023)
 - CIL Sensitivity Test Viability Report Errata Addendum (December 2023)
 - CIL Viability Assessment Study (December 2022)
 - CIL Infrastructure Funding Gap Assessment (July 2025)
 - Local Plan Infrastructure Delivery Plan (July 2025)
5. The CIL DCS SoM consultation ran to 15 August 2025.
6. Independent examination of the CIL DCS is scheduled for Tuesday 2nd September 2025, following the close of the CIL DCS consultation.

Prior Representations

CBRE was previously instructed to prepare representations on the previous CIL Viability Study evidence base produced by PPE on behalf of CYC, as published as part of the CYC CIL DCS Spring and Winter 2023 consultations.

The previous representations highlighted technical issues with the evidence base, which undermined the validity of this to inform CYC's proposed CIL charging regime.

Many issues remain unresolved in CYC's latest published evidence base.

In summary, CBRE's previous representations identified the following issues:

- Illogical timing of implementation of CIL during a period of economic deterioration and challenge.
- Outdated evidence, in particular relying on unrealistically low construction costs that fail to reflect the recent inflationary environment.
- Absence of testing for the conversion of existing non-residential floorspace for residential use (e.g. upper floors in existing premises, which are prevalent in York).
- Unduly simplistic core/non-core residential pricing approach.
- Lack of evidence in supporting proposed Benchmark Land Values ('BLV').
- Lack of transparency by not providing corresponding viability appraisals for stakeholders to analyse.

CYC and PPE have provided a formal set of responses to the CIL Viability Study consultation representations within the 'CIL Consultation Statement'. This provides a summary of the main issues raised in both the Spring 2023 and Winter 2023 consultation and outlines CYC's response. However, these responses lack robust justification and do not suitably detail why the issues raised within the representations have not been addressed within the CIL Viability Addendum.

As such, within this representation, CBRE has referred to and provided responses back to PPE's and CYC's responses set out within the CIL Consultation Statement and CIL Viability Assessment Update.

Fusion Background

7. Fusion is a developer and operator of Purpose Built Student Accommodation ('PBSA') with a portfolio spanning the entire UK. Fusion has a number of operational PBSA schemes in regional cities including Bristol, Cardiff, Newcastle, Nottingham, Sheffield and Swansea. Further schemes are in the pipeline in locations such as Birmingham, Brent Cross, Glasgow, Manchester, Leeds, Liverpool, London Wood Green, Loughborough and Portsmouth.
8. Fusion intends to bring forward a major redevelopment scheme in York city centre at Foss Bank and is in the process of formulating a masterplan, supported by a consultancy team led by planning consultants O'Neill Associates.

Fusion's Stance

9. Fusion has fundamental concerns regarding:
 - a. CYC's proposal to introduce CIL charging on 'off-campus' purpose built student accommodation ('PBSA') development within the revised CIL DCS; and
 - b. CYC's proposal to introduce CIL charging on residential dwellings within the City of York in the Revised CIL DCS.
10. It is Fusion'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.

11. In light of above Fusion does not accept the validity and reliability of the published viability evidence base upon which the proposed residential charging rates within the Revised CIL DCS relies, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.
12. On this basis, Fusion cannot agree with CYC that there is an appropriately evidenced and legally compliant basis upon which the Revised 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.
13. Should CYC determine not to rectify the issues identified in this representation, Fusion 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

14. 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.
15. This constitutes Fusion's formal request to be heard at the examination of the CIL DCS, as an 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

16. This section of the document sets out the matters of representation that Fusion 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 Revised CIL DCS Rates

17. The Revised CIL DCS proposes a significant increase in the costs on development via the introduction of CIL charging on multiple uses for the first time.
18. Notably, the Revised CIL DCS introduces a revised residential CIL rate and the reinstatement of strategic sites ST1 and ST5 (highlighted blue)

Modifications are represented as new text in **yellow highlighted bold text (December 2023 modifications)** and **blue highlighted bold text (July 2025 modifications)**

Development type		CIL rate per sqm	Modification Proposed Explanation
Residential dwellings within the City of York		£150	Amend the CIL rate to £200 from £150 to reflect revised viability.
Residential dwellings within the City of York Local Plan strategic sites ST4 , ST7, ST8, ST9, ST14, ST15, ST31 and ST33		£0	To include ST4, ST31 & ST33 as £0 to reflect revised viability.
Residential dwellings within the City of York Local Plan strategic sites ST1, ST5, ST16 and ST36		£100	No change to CIL rate. ST1 and ST5 have been reinstated in this section rectifying an omission from the December 2023 modifications.
Sheltered/ Retirement accommodation		£0	All sheltered/ retirement accommodation now proposed to be £0 rated to reflect revised viability.
Extra care accommodation		£0	All extra care accommodation now proposed to be £0 rated to reflect revised viability.
Purpose Built Student Accommodation	Off Campus	£150	Removed original categories. New split categories to differentiate geographically between on and off campus purpose built student accommodation to reflect revised viability.
	On Campus	£0	
Convenience ¹ retail with up to 450 sqm gross internal area		£0	Amend the CIL rate to £0 from £100 to reflect revised viability.
Comparison ² retail built outside the City Centre boundary		£0	Amend the CIL rate to £0 from £100 to reflect revised viability.
Comparison retail built inside of the City Centre boundary		£0	No change proposed
All other development		£0	No change proposed

¹ Convenience retail provides lower value good purchased regularly to meet day to day needs such as food, newspapers, petrol etc.

² Comparison retail provides higher value goods purchased less often, such as household items, electrical goods, clothes, shoes etc

19. These are not incremental changes, but rather represent a fundamental shift to introduce substantial rates of CIL charging across multiple uses both a city-wide and a zonal basis. This is particularly true for PBSA, where the proposed changes will coincide with the introduction of Offsite Financial Contributions towards Affordable Housing (Policy H7 of the CYC Local Plan 2025).
20. 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

21. Due to the challenging economic backdrop, only Calderdale Council has pursued the adoption or revision of a CIL charging schedule in Yorkshire and Humber, since Harrogate adopted their CIL Charging Schedule in July 2020.
22. CBRE is aware that other Local Authorities such as Birmingham City Council has halted proposals to formally review their CIL Charging Schedule over this period due to the challenging economic and property market context. CYC's proposition to introduce high charging rates for the first time is contradictory to decisions being made by other major regional cities and district authorities across the North and Midlands.
23. As a result, such proposals by CYC must necessitate comprehensive, robust, and up-to-date available evidence of financial viability to provide appropriate justification that they will strike an appropriate balance in accordance with Regulation 14(1) of the CIL Regulations (as amended).
24. Further reference to the illogical timing of CYC's decision to introduce a CIL charging regime is set out in the following sub section.

Illogical Timing

25. The UK property market is experiencing a prolonged and highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally since 2022. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Whilst the Bank of England base rate has contracted steadily under the current Labour government, development and investment across a wide range of sectors continue to face headwinds, which commenced in mid-2022 and are expected to prevail into early 2025.
26. Specifically:
 - a. The UK economy remains challenged with numerous headwinds. Most notably, inflation remains elevated, driven primarily by regulated gas price increases. As at June 2025, CPI was 4.1% and had remained in excess of the Government's target of 2% since 2021. This inflation has contributed to falling real household incomes throughout 2025.
 - b. Labour markets have also softened as nominal and real wage growth have slowed, and business taxation has increased. CBRE estimates that unemployment has increased 30bps to 4.7% since the Autumn Budget, and forecast the labour market to continue loosening through the remainder of 2025.
 - c. Global uncertainty and risks, driven by continued conflict in Ukraine and the Middle East coupled with U.S. Trade Policy, have stunted activity across the global economy. Despite the UK reaching a trade deal with the U.S., there remains a 10% tariff on most goods and 25% on exports of steel and aluminium. CBRE The ongoing geopolitical conflicts and potential escalation remains a threat to energy markets and medium-term price stability.
 - d. For businesses, the prolonged period of high inflation and instability will continue to erode profit margins, reduce investment, and dampen activity. The increase in taxation via employer national insurance announced in the Spring Statement has placed further pressure on businesses.

¹ Note: this information was obtained from Planning Resource and is understood to have been correct as at August 2025. The rates presented are not indexed, but represent those rates either proposed (latest) or at the date of adoption of relevant Charging Schedules.

- e. The consumer sector also remains volatile, showing month-to-month swings and remaining persistently negative. The GfK Consumer Confidence Index moved down to -19 in July 2025 from a six-month high of -18 in June, as household caution grows amid rising concerns over taxes and inflation.

27. Specifically, considering the PBSA sector, CBRE's baseline forecast for 2025 is as follows:

- a. Overall, the sector continues to be defined by an acute supply and demand imbalance but this is highly nuanced, and an understanding of affordability is key. An in-depth understanding of the submarket dynamics is critical.
- b. New HESA data 2023/24 shows a decline of 1.5% in full-time students to 2.24m, driven by a drop in international students. However, undergraduate application data for 2025/26 from UCAS indicates that internal student demand could recover.
- c. Deliveries in 2024 were the second lowest on record, at approximately 12,500 beds and new supply is expected to remain constrained, with CBRE forecasts indicating less than 18,000 beds delivered per year by 2027.
- d. PBSA transactions slowed in Q1 2025 but investment yields have remained stable for prime regional assets and sentiment remains positive for best in class 'clean and green' properties with stronger rental growth prospects. However, transactions of best in class assets have been limited over the past 24 months due to low supply. With forward funding opportunities becoming less viable, investors are looking towards joint venture or asset management opportunities due to lower risks.
- e. Investor optimism persists due to strong 2025/26 UCAS data, potential further Base Rate cuts and stable long-term sector fundamentals.
- f. Rental growth is beginning to stabilize after years of strong performance and incentives are being deployed to secure early occupancy for the upcoming academic year. As rents stabilise, CBRE expects capital values, on a per bed basis, to plateau in the absence of yield compression. If operating costs continue to rise due to underlying inflationary pressures, capital values could begin to soften over time.
- g. Overall, the PBSA sector continues to face challenges resulting from rising build costs, planning delays and additional regulatory costs, rising operational costs, and restricted development finance.

28. CBRE's baseline forecast for the residential market in 2025 is as follows:

- a. The residential sales market has gradually improved as mortgage rates have fallen, however volatile consumer confidence threatens to hinder this in the context of uncertainty looking forward to the Autumn Statement.
- b. Investment in the living sector in H1 2025 was 30% below the same period of 2024 and CBRE forecast this to be 7% lower for the year than 2024.
- c. A supply and demand imbalance persists, as new regulations have driven some landlords out. Persistent high and increasing construction costs, high debt costs, planning delays, new building safety regulations and associated delays are all contributing to challenges for residential developers.
- d. The anticipated introduction of Future Homes Standard and the Building Safety Levy in 2026 will add further cost burden upon residential developers, placing greater pressure on profit margins and compounding viability challenges.

- e. The inflationary climate coupled with macro-economic and geo-political instability and rising interest rates, has resulted in a softening of residential investment yields since 2023. This has stabilised during 2024 and 2025, but conditions remain challenging and subdued. The liquidity pool of investors seeking forward funding opportunities for Build-to-Rent assets is shallow and, due to the resultant viability constraints, there are few transactions occurring in this challenging market.
 - f. In the context of this challenging backdrop, developers across the UK are relying upon grant funding to help support deliverability of residential schemes.
29. Against this backdrop, CBRE still 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. CYC's proposals to increase the cost burden on development at this point will exacerbate uncertainty and slow or stall development and regeneration plans for PBSA and residential development on sites across the city.
30. Under Section 5 of the CIL Consultation Statement, CYC & PPE address these concerns, stating that *"we acknowledge that markets do fluctuate over time, and even monthly, as they will after CIL is adopted, but it would be impractical to re-run the appraisals every month."* CYC & PPE state that *"instead, in setting the CIL rates, we have allowed for a significant buffer to accommodate such fluctuations."*
31. CBRE consider that CYC and PPE's response misses the point. Markets are in a prolonged challenging period. Any material upswing will likely take years, not months. The addition of a CIL regime will compound this and prolong the impact in York, deterring investment.
32. CBRE's critique of PPE's adopted viability buffer is provided within the 'Results & Re-Appraisal' sub-section of this representation.

Outdated Evidence

33. The published available evidence to inform the Revised CIL DCS is the CIL Viability Addendum produced by PPE dated June 2025. CBRE has reviewed the CIL Viability Addendum in detail.
34. PPE confirm, in paragraph 2, that the Viability Addendum *"sets out the evidence and summarises an update in sales values and build costs for new residential dwellings and student accommodations in the City of York at the current time, and their retested viability results based on the updated assumptions."* PPE also confirm that *"all other viability assumptions that were tested in the City of York CIL Viability Study (Dec'22) and updated in the City of York CIL Viability Addendum (Nov'23) remain the same."*
35. This indicates that, of the information and assumptions underpinning PPE's viability assessment (as at June 2025), only sales values and build costs reflect up-to-date estimates. Therefore, PPE's Viability Addendum relies partly upon data dating as far back as December 2022.
36. As set out above, and well-documented, there 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.
37. Furthermore, there are a number of assumptions critiqued by CBRE in previous representations which have not been appropriately addressed or updated by PPE, and therefore, remain consistent with PPE's previous viability assessments. Notably, these are:
- a. **Garages:** The Viability Addendum includes a single garage cost of £9,000, which is maintained throughout both the CIL Viability Assessment Study (December 2022) and CIL Viability Addendum (November 2023). Under Section 5 of CDS4 'CIL Consultation Statement' (July 2025) PPE state that

“CBRE’s technical note provides no evidence for us to check and/or challenge their opinion, and we consider that we have set an appropriate allowance for this strategic study in terms of separate garage spaces that may appear only on a minority of sites.” CBRE note that PPE’s assumption has not been substantiated by evidence and the technical deficiencies of this are addressed within ‘Technical Deficiencies’ sub-section of this representation. Nonetheless, PPE’s adopted rate of £9,000 per single garage is reflective of assessment of cost as at Q4 2022 and therefore does not account for the significant cost inflation that has occurred in the intervening period. These costs are, therefore, unreflective of those currently facing developers and risk overstating the viability of residential developments and associated headroom to accommodate a CIL charge.

- b. **Demolition and land remediation:** The Viability Addendum does not provide a re-assessment of demolition and land remediation costs. Within the CIL Consultation Statement, PPE state that *“we therefore applied a widely used by the Homes England ready reckoner and have allowed inflationary increases.”* As previously highlighted by CBRE, this remains reliant upon guidance dated 2015, which was withdrawn in 2022. It remains unstated and hence unclear how these costs have been calculated and what constitutes PPE’s allowance for ‘inflationary increases’ and whether these have been allowed up to present day.
 - c. **M4(2), M4(3)(A), M4(3)(B):** Within CBRE’s representation to the Winter 2023 Consultation, CBRE highlighted that the costs associated with accessibility and adaptability requirements were based upon a historic EC Harris report, dated 2014. CBRE requested that these rates should be indexed to present day to fully account for the impact of inflation. CYC & PPE acknowledge this point under Section 3 of the Consultation Statement, but it is not clear whether this has been reflected within PPE’s updated viability testing. Therefore, it appears that PPE’s assessment remains reliant upon cost evidence which is more than 10 years dated, which risks overstating the viability of residential developments and associated headroom to accommodate a CIL charge.
38. In addition, New Fire Safety (England) Regulations 2022 came into force on 23 January 2023 and under the new Regulations, a responsible person (usually a managing agent or similar) is required to provide information and carry out checks on fire safety for all buildings over 11m (or 5 storey) which contain at least two domestic premises.
 39. In accordance with Approved Document B, there is also a requirement for firefighting lifts in buildings to offer additional protection and controls that enable it to be used by the fire and rescue service when fighting a fire. This is a requirement when the lift needs to travel more than 18m above or 10m below the fire service vehicle access level. The firefighting lift must have a secondary back-up power supply to ensure it continues to operate in the event of power failure in the building, a lift control system and a lift communication system.
 40. The recent amendments to Approved Document B also introduces requirements for all new buildings of 30m (circa 10 storeys) or above from September 2026 to include a second separated staircase.
 41. Developers and investors are factoring 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.”

42. 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.”

43. 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).
44. As previously critiqued by CBRE, in spite of recent confirmation and clarification relating to this requirement, it does not appear that the CIL Viability Addendum has accounted for the this or addressed the implication.
45. Furthermore, following technical consultation in 2024, the Government has announced the introduction of the Building Safety Levy², which introduces an additional charge on all new residential dwellings and purpose-built student accommodation (excluding affordable housing), following a methodology broadly consistent with CIL. Draft regulations ('The Building Safety Levy (England) Regulations 2025') were laid in Parliament on 10 July 2025, and whilst these remain subject to parliamentary approval, the Government has announced that the levy will come into operation on 1 October 2026. The confirmed levy rates for York are as follows:
- Previously Developed Land: £15.81/m²
 - Non-Previously Developed Land: £31.61/ft²
46. Whilst development on brownfield land benefits from a 50% discounted rate, this nevertheless reflects an additional and non-negotiable capital cost to new development schemes with a negative impact on development viability, which should be consider within the CIL setting process.
47. Within paragraph 3 of the CIL Viability Addendum, PPE acknowledge the potential impact of the Building Safety Levy on viability headroom.
48. However, PPE simply state that *“these proposed regulatory changes will require secondary legislation, which we understand is planned for the end of 2025. These changes are therefore not yet considered certain and will not impact development viability at this current time.”*
49. Considering the Government's intention is to introduce this charge from October 2026, with the BSL payment due prior to practical completion, CBRE considers it highly likely that this would impact development viability for a number of site typologies assessed.
50. It is also unrealistic to assume that CYC will review its CIL Charging Schedule in circa 12 months. Hence, the BSL will almost immediately act as a supplementary cost to CIL on development, which is not yet accounted for within the viability testing or the buffer allowance provided by PPE (as this buffer pre-dated the Government announcement of the BSL).
51. It is, therefore, recommended that:
- a. the published costs associated with BSL are incorporated with the viability assessment and/or sensitivity tested as a minimum to determine the impact on viability and CIL 'headroom'; or
 - b. an alternative option would be to simply introduce a reduction in the proposed CIL rates commensurate to the additional cost of the BSL (on a £/m² basis), hence allowing an 'equivalence

² <https://www.gov.uk/guidance/building-safety-levy-guidance>

buffer'. It would be straightforward for the Inspector to recommend such a modification to the CIL DCS.

52. CBRE has provided further details upon this relating to residential and PBSA use within the 'Technical Deficiencies' sub-section of this representation.

Technical Deficiencies

Purpose Built Student Housing

53. There are a range of detailed technical issues identified, which render the CIL Viability Addendum as an unsound basis for setting the proposed CIL rates for purpose built student housing, and which Fusion advocate will require rectification prior to CYC proceeding with the Revised CIL DCS as presently published:

a. **PBSA Typology Room Sizes:**

- i. The PBSA comparables cited in the Appendix A3 of 2025 Addendum do not provide room sizes for the purpose of analysis. The comparables are merely categorised as 'Cluster Flat' and 'Studio Units', which is not transparent and does not assist with comparison between room types.
- ii. The CIL Viability Addendum maintains a generic room size of 17.25m². Under Section 5 of the CIL Consultation Statement, CYC & PPE state their justification as "*The tested PBSA average room size was taken from a previous viability technical note informing the Local Plan viability testing (see examination document EX/CYC/107/3 Student Housing Policy H7 Note August 2022) paragraph 9, which notes that based on the available parameters from four recent PBSAs in York, the average room size for ensuite bedrooms is c.15 sqm and for studios is c.24 sqm. Also, the ratio of ensuite to studio rooms is typically around 3 to 1, so together the average room size is tested at 17.25 sqm within a PBSA typology.*"
- iii. On review of the examination document cited above, the figures of 15sqm for en-suite rooms and 24sqm for studios do not appear to be based on evidence - rather an assumption. CBRE notes PPE's assertion that generic room size is derived from a 3:1 weighted average ratio of en-suite and cluster rooms. CBRE does not disagree with this ratio.
- iv. In previous representations CBRE raised concerns that the typologies presented by CYC and PPE incorporate a net to gross efficiency of 65%, despite evidence from submitted and recently consented schemes indicating a more appropriate efficiency of 55-60%. It appears that this has not been addressed in Section 5 of the CIL Consultation Statement and the efficiency of the typologies appears to remain unchanged.
- v. CBRE has undertaken further research into consented and recently completed schemes to further justify a more appropriate net to gross efficiency:
 1. Frederick House, a 275 unit scheme, comprising 193 en-suite rooms and 82 studios, completed in December 2024 (planning ref: 21/01605/FULM) demonstrates a net to gross efficiency of 56%.
 2. Peppermill Court, a 210 en-suite scheme, granted planning permission in July 2023 (planning ref: 22/02024/FULM) demonstrates a net to gross efficiency of 48%.
- vi. Based on CBRE's knowledge of the York PBSA market, the adopted room size utilised within the CIL Viability Addendum is positioned between the expected size range for 'studios' and

‘cluster/en-suites’. Studios are typically larger at an absolute minimum of 20-21m², whilst cluster / en-suite rooms are generally much smaller at circa 10-15m² and attract lower weekly rents in comparison to PPE’s rental assumption.

- vii. CBRE is aware that CYC refused a planning application for a PBSA scheme at 15 Foss Islands Road based on limited room size and lack of communal space³. The Foss Islands Road scheme included 137 no. studios ranging in size from 20-42m².
- viii. The Foss Islands Road was resubmitted for planning with adjusted room sizes and to resolve the reason for refusal by CYC, the communal areas were increased, resulting in a revised net to gross efficiency of 60%. The revised scheme was approved in March 2024. Additionally, the Coney Riverside development scheme, approved in October 2024 (planning ref: 22/02525/FULM) demonstrates a net to gross efficiency of 60%.
- ix. This evidenced efficiency is 5% lower than that assumed by PPE in the PBSA viability testing. The consequence of this is that the GIA area utilised in viability testing would be expected to be 5% larger than currently modelled by PPE. Hence, PPE’s estimation of build costs for each of the PBSA viability typologies is 5% lower than it should be, which erroneously overstates the financial viability of the PBSA typologies.
- x. Taking this into consideration, it is therefore highly unlikely that the proposed hypothetical scheme used in the PBSA typologies testing would actually be granted planning consent by CYC as the room sizes would be considered too small for studios or not akin with comparable cluster/en-suite room sizes and the communal areas would be insufficient to meet CYC planning officer’s minimum expectations. The room sizes would evidently need to be larger whilst maintaining an appropriate gross to net efficiency. Any reduction in gross to net efficiency would lead to the loss of valuable amenity space which drives the rental value. As a result, this necessitates a proportionate increase in both room sizes and GIA within the PBSA typologies tested.
- xi. Adoption of an unjustified and incorrect room size and building GIA by PPE / CYC poses a significant risk to overstating the viable delivery of PBSA developments by understating the total construction costs attributable to the PBSA typologies.
- xii. For the reasons set out above, CBRE strongly advocates that the room size adopted for viability testing developer-led (i.e. off campus) PBSA typologies is reflective of the York PBSA market.
- xiii. CBRE has prepared an analysis of the impact upon the NIA and GIA of PBSA typologies’ when utilising the (absolute) minimum comparable room size for studios (at 20m²) in the York PBSA market. This analysis is provided in **Table 1**.
- xiv. The table below demonstrates that adopting an informed, representative room size has a significant impact (c. 16% increase) on the GIA of the PBSA typologies.

³ Planning application ref: 22/01795/FULM. Refused 13 July 2023. CYC stated a reason for refusal of the application concerned “The proposed development fails to promote the health and well-being of future occupants due to the limited room size of the studios and lack of communal spaces throughout all levels of the development”.

Table 1: PBSA Typologies | NIA & GIA Analysis: 65% Gross:Net

CIL Viability Addendum PBSA off campus					CBRE Analysis based on York PBSA Market					
Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	GIA Increase %
600	17.25	10,350	65.0%	15,923	600	20.0	12,000	65.0%	18,462	16%
350	17.25	6,038	65.0%	9,288	350	20.0	7,000	65.0%	10,769	16%
200	17.25	3,450	65.0%	5,308	200	20.0	4,000	65.0%	6,154	16%
100	17.25	1,725	65.0%	2,654	100	20.0	2,000	65.0%	3,077	16%

Source: CYC / CBRE Data

- xv. This is based on the assumption of 65% net to gross, which through the Foss Islands refusal demonstrates that 65% is insufficient to meet CYC planning policy requirements as a result, CBRE has also tested the impact of correcting the PBSA built GIA within each of the typologies to a 60%⁴ net to gross efficiency, which is expected to be consistent with CYC's requirements for communal and amenity space within PBSA schemes. This analysis is provided in **Table 2**.

Table 2: PBSA Typologies | NIA & GIA Analysis: 60% Gross:Net

CIL Viability Addendum PBSA off campus					CBRE Analysis based on York PBSA Market					
Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	GIA Increase %
600	17.25	10,350	60.0%	17,250	600	20.0	12,000	60.0%	20,000	16%
350	17.25	6,038	60.0%	10,063	350	20.0	7,000	60.0%	11,667	16%
200	17.25	3,450	60.0%	5,750	200	20.0	4,000	60.0%	6,667	16%
100	17.25	1,725	60.0%	2,875	100	20.0	2,000	60.0%	3,333	16%

Source: CYC / CBRE Data

- xvi. The CIL Viability Addendum therefore miscalculates and misrepresents the correct representative (and reasonable) market-facing NIA and GIA to be utilised for the PBSA typologies in order to secure planning permission in York from CYC, which has severe consequences in understating the total construction costs.
- xvii. CBRE strongly advocates that CYC review the NIA and GIA of PBSA typologies to be reflective of the York PBSA market and CYC's precedents for securing planning permission and adjust their inputs accordingly.

⁴ The resubmitted planning applications for 15 Foss Islands Road (planning ref: 23/01647/FULM) and Coney Riverside (planning ref: 22/02525/FULM) demonstrate a gross to net efficiency of 60.0%.

b. Rents, Yields and Capital Values for Off-Campus PBSA Typologies:

- i. As in the 2023 Addendum, the 2025 Addendum tests the 5no. off-campus PBSA typologies ranging from 25 beds to 600 beds. An average gross rental income is applied of £249/week for a term of 49.2 weeks. This is informed by advertised rents for the 2025/26 academic year, drawn from a cross-section of PBSA schemes across the city, which is provided in Appendix A3 of the document. This reflects an increase of 23% on the rental values adopted in the 2023 Addendum.
- ii. OPEX is deducted at 30% of gross annual rent to generate a net rental income, which is capitalised at an investment yield of 5.25%. This is stated as generating a capital value of £160,000 per room.
- iii. CYC and PPE have not transparently disclosed how either the adopted generic rate of £249/week, or the term of 49.2 weeks has been calculated. CBRE has analysed the comparables in Appendix A3 of the Viability Addendum (2025), which have been used to inform the adopted rental rate and term. It appears that an unweighted average of weekly rents for Cluster Flats (£221.50) and Studios (£277.33) have been averaged to derive the generic rent of £249 per week. Similarly, an unweighted average of 47.5 weeks for en-suite rooms (assuming a standard 50/50 split in tenancy length of 44 and 51 weeks) and 51 weeks for studios, results in an average generic tenancy length of 49.25 weeks.
- iv. CBRE would welcome clarity on the derivation of these figures, given their importance to determining the typologies' Gross Development Value ('GDV').
- v. CBRE has reviewed the evidence base at Appendix A3 of the Viability Addendum, and notes that the figures were collected in August 2024. Purpose built Student Accommodation rents are subject to dynamic pricing, which can cause significant uncertainty in the market value. Additionally, there appears to be several duplicate entries in the evidence base, which may influence the derived rent.
- vi. CBRE conducted a contemporary comparables search in August 2025 order to update PPE's evidence base. This is presented in **Enclosure 2**, and a comparison is summarised in **Table 3**, overleaf:

Table 3: Comparable Rental analysis | Minimum* weekly asking rent per accommodation type

Address	Operator	Cluster Room			Studio		
		PPE (Aug-24)	CBRE (Aug-25)	CBRE (net of incentive)	PPE Min	CBRE Min	CBRE Min (net)
6-18 Hull Street	Student Roost	£229	£189	£169	£287	£229	£155
Foss Studios	Hello Student	-	-	-	£260	£255	-
Walmgate	Student Castle	£220	£228	£228	-	£295	-
Hallfield Road	iQ	£190	-	-	£316	£301	£291
2-14 George Hudson Street	Primo Property	-	-	-	£175	-	-
Lawrence Street	Vita	£243	£260	£260	£341	£292	£292
Lawrence Street	Hello Student	£230	-	-	£300	£322	£322
Coal Yard	Prestige	£234	£198	£198	£299	£249	£249
Frederick House	Student Roost	£215	£175	£155	£259	£199	£179
Abode	Homes for Students	-	£199	£199	-	£249	£249
Mean weekly rate (£/wk)		£222	£208	£201	£278	£266	£248

Source: CBRE Research

* Minimum displayed to align with PPE's methodology to derive the market rent

- vii. As of 13th August 2025, cluster rooms and studios are being advertised at average rents of £208 and £266 per week, resulting in a combined off-campus rate of £237 per week. This reflects a lower growth of 8.5% year-on-year from the 2023 Addendum. CBRE notes that the average weekly advertised rents for en-suite rooms are 7% lower in August 2025 than in August 2024. Similarly, the average weekly rent for Studios is 4% lower than in August 2024.
- viii. The analysis indicates that the evidence base appears to have overstated the market rent for PBSA. This is likely due to dynamic pricing models employed by PBSA operators, from sector forecasts⁵ indicate stabilizing rental growth in 2025, rather than any contraction.
- ix. CBRE further notes that several schemes are currently offering incentives for tenants, with monetary values ranging from £500-£1,000 in some instances. CBRE has therefore calculated the impact of these incentives on the weekly rate (assuming a 51 week tenancy), which indicates a current average rent of incentives reflecting £201 per week for en-suite rooms, and £248 per week for studios. Whilst this indicates dampened demand, CBRE is cautious to adopt these lower rents, given the prevalence of dynamic pricing within the PBSA market.
- x. CBRE has cross checked this against CBRE's internal tracking for PBSA rents in York, which records advertised rents for schemes on a quarterly basis, offering a more robust sample.

5 <https://content.knightfrank.com/research/169/documents/en/uk-student-housing-q1-2025-12116.pdf>

Average rates for en-suite rooms and studios are £201 per week, and £270, respectively, which indicates a blended rent of £237 per week.

- xi. It is CBRE's view that this rate is a more robust representation of the rental tone in York and recommends its adoption in the viability testing.
- xii. Regarding the adopted yield, in previous representations, CBRE had set out investment transactions, as follows and demonstrating a tone of circa 5.5%-6.5% NIY and capital value of circa £90,000-£100,000 per bed:
 - 1. 3 James Street: comprising 303 beds transacted in June 2023 on a forward fund to S Harrison at a yield of 5.50% to 5.75%.
 - 2. 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.
 - 3. 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.
 - 4. Foss Studios: comprising 220 beds transacted in 2017 on a stabilized investment basis at a NIY of 5.7%, reflecting £106,000 per bed.
- xiii. Subsequently, CBRE highlights the following property currently on the market:
 - 1. The Coal Yard, Mansfield Street, a 189 unit stabilised scheme marketed in 2024 with guide price of £27,800,000 on a yield of 5.25%, reflecting a capital value per bed of £147,000. The property has subsequently been relisted. CBRE has been advised that the guide price reflects a yield of 5.75% currently. The property benefits from a nominations agreement with York St John's University.
- xiv. 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.
- xv. On the basis of the above, CBRE ranks York as a Prime Regional location for PBSA and understand that other agents such as Knight Frank regard the city on an equivalent basis. However, CBRE considers York to be marginally behind other Prime Markets, including Bristol, Cardiff and Exeter, where demand characteristics is stronger.
- xvi. CBRE has analysed several recent transactions in other Prime Regional locations for PBSA which are considered marginally stronger than York, where information is available. These demonstrate investment yield tones of 5.50-6.0% for stabilised assets:
 - 1. The Place, Nottingham: Comprising 409 beds purchased by L&G in April 2025 on a stabilised investment basis at a NIY of 5.50%, reflecting £110,000 per bed. The property was completed in August 2024.
 - 2. 5-8 London Road, Brighton, comprising 156 beds, purchased by M&G in December 2024 on a stabilised investment basis at a NIY of 5.35%, reflecting £240,000 per bed.
 - 3. The Neighborhood, a portfolio of two schemes in Cardiff and Exeter totaling 400 beds, purchased by Greystar in January 2025 on a stabilised investment basis at a NIY of 5.60%, reflecting £150,000 per bed.

- xvii. On the basis of the transactions above, 'best-in-class' in York would currently indicate 5.25%. CBRE's capital markets specialists have advised that this would be an institutional specification; high quality specification, well located, and with a lot-size of £40-60 million.
- xviii. The above evidence suggests that the adopted capital value per bed of £160,000 and a yield of 5.25% utilised within the CIL Viability Addendum actually exceed transactional evidence available for York in recent years., and stronger locations in the current market.
- xix. PBSA prime regional (direct let) stabilised investment yields have remained stable in 2025. The latest available investment yield sheets now record Prime Regional PBSA yields for stabilised asset as follows:
 - 1. Knight Frank Prime Yield Guide – June 2025: PBSA Prime Regional at 5.0% - 5.25% (stable from Q1 2025)⁶.
 - 2. CBRE UK Living Sectors Investment Yields – August 2025: PBSA Prime Regional at 5.0% (stable from Q2 2025)⁷.
 - 3. Cushman & Wakefield – May 2025: PBSA Prime Regional at 5.25% (stable from Q1 2025).
- xx. In summary, respected agents all report PBSA Prime Regional stabilised yields stable at c. 5.25% at present day. Importantly, these are not development funding yields, but are stabilised investment yields, which do not account for development and stabilisation (letting) risk (i.e., transaction by a fund of a high specification stabilised standing PBSA asset).
- xxi. CBRE notes in the June Viability Addendum, table A4 that the quoted Knight Frank Prime Regional Yields are reported as 4.25%. CBRE notes that this reflects Prime Regional RPI leases, rather than Direct Let properties. RPI leases are a minority in regional PBSA markets, and as such the Direct Let Yield of 5.00-5.25% should be considered Knight Frank's relevant professional view for the purpose of CIL viability testing.
- xxii. 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 up to 50bps in comparison to stabilised investment yields. As a result, if the rates above are adjusted for development funding, this would see yields at 5.50%-5.75%, which is reflective of the recent forward funding deal in York at 3 James Street.
- xxiii. PPE has evidently not considered current PBSA investment evidence in York and has failed to reflect that forward funding is the key delivery route for financing PBSA schemes in the current market. Consequently, PPE is incorrectly overstating the GDV of the PBSA typologies.

c. Construction costs:

- i. The construction costs adopted are set out in Table A6. (CIL Viability Addendum, page 5) are cited as being drawn from RICS BCIS. The RICS BCIS median cost is cited as £2,253/m² (£209/ft²) and base-dated at Q1 (i.e. Jan-March) 2025. It is stated that this matches the

⁶ Note: this is provided within **Enclosure 2**.

⁷ Note: this is provided within **Enclosure 2**.

timescales for the 'sales values'. CBRE assumes this should read 'rental comparables', but would welcome clarification.

- 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 26 July 2025. On an equivalent basis the BCIS median cost now stands at £2,252/m² (£209/ft²), which is a decrease of 0.5%. The data is provided within **Enclosure 4**.
- iii. CBRE comment that the RICS BCIS costs of £2,252/m² (£209/ft²) are extremely low in the context of off-campus developer / operator led PBSA developments being brought forward for delivery in regional cities in the current market. CBRE also 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), which prudent developers have been told by the Government to design into schemes.
- iv. In **Table 4** overleaf, CBRE has set out both a comparison between the RICS BCIS median rate costs as at Q1 2023 and July 2025. CBRE considers these costs to be more likely representative of construction to a low-mid specification product, which would achieve a lower than average (i.e. more affordable) rental price point in the York market than that adopted by PPE. 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 £238/week) or above.
- v. CBRE notes that even the RICS BCIS upper quartile rate (£2,437/m² | £226/ft²) generates a construction cost which remains significantly below the level of costs being seen for mid-market specification PBSA schemes in the regions (i.e., circa £100,000 per bed). This is provided for comparison against the RICS BCIS median rate in **Table 4**.
- vi. CBRE can provide up to date benchmarking evidence on construction costs for recently tendered PBSA schemes of 400+ beds. The construction costs have been indexed from the contract award date to present day (Q3 2025) in order to reflect inflation during the intervening period.
 1. Nottingham scheme of circa 550 beds: £251/ft² (July 2023, similar date to the CIL viability evidence base) adjusted using BCIS All-in TPI to Q3 2025 £257/ft²
 2. Liverpool scheme of 400-500 beds: £248/ft² (June 2023, similar date to the CIL viability evidence base) adjusted using BCIS All-in TPI to Q1 2025 £261/ft²
- vii. This benchmarking evidence suggests that even the RICS BCIS upper quartile rate is unrealistically low and developers are facing significantly higher construction costs for PBSA schemes.
- viii. For the reasons set out above, CBRE strongly advocates that the RICS BCIS upper quartile rate should represent the **absolute minimum** base construction cost for generic 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. PPE's use of an unrealistically low construction cost will erroneously state the viability of the PBSA typologies tested.

Table 4: Comparison Analysis | RICS BCIS Costs Q1 2025 vs. Q3 2025 vs. Minimum Market Rates (CBRE Q3 2025)

Based on PPE's gross to net efficiency of 65.0%

RICS BCIS Median Q1 2025		Build		External Works		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	£/Bed	Cost (£)
2,253	209.3	18,462	41,593,846	600	69,323		4,159,385	6,932	45,753,231
									£/m2
2,253	209	10,769	24,263,077	350	69,323		2,426,308	6,932	26,689,385
									£/ft2
2,253	209	6,154	13,864,615	200	69,323		1,386,462	6,932	15,251,077
									£/m2
2,253	209	3,077	6,932,308	100	69,323		693,231	6,932	7,625,538
									£/ft2
									230
									230
									230
									230

RICS BCIS Median Q3 2025		Build		External Works		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	£/Bed	Cost (£)
2,219	206.2	18,462	40,966,154	600	68,277		4,096,615	6,828	45,062,769
									£/m2
2,219	206.2	10,769	23,896,923	350	68,277		2,389,692	6,828	26,286,615
									£/ft2
2,219	206.2	6,154	13,655,385	200	68,277		1,365,538	6,828	15,020,923
									£/m2
2,219	206.2	3,077	6,827,692	100	68,277		682,769	6,828	7,510,462
									£/ft2
									227
									227
									227
									227

RICS BCIS Upper Quartile Q3 2025		Build		External Works		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	£/Bed	Cost (£)
2,417	224.55	18,462	44,621,538	600	74,369		4,462,154	7,437	49,083,692
									£/m2
2,417	224.55	10,769	26,029,231	350	74,369		2,602,923	7,437	28,632,154
									£/ft2
2,417	224.55	6,154	14,873,846	200	74,369		1,487,385	7,437	16,361,231
									£/m2
2,421	224.92	3,077	7,449,231	100	74,492		744,923	7,449	8,194,154
									£/ft2
									247
									247
									247
									247

Source: RICS BCIS / CBRE Data

Table 5: Comparison Analysis | RICS BCIS Costs Q1 2025 vs. Q3 2025 vs. Minimum Market Rates (CBRE Q3 2025)

Based on corrected gross to net efficiency of 60.0%

RICS BCIS Median Q1 2025		Build		External Works		Total Costs (Build + External)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	10% £/Bed	Cost (£)
2,253	209.3	20,000	45,060,000	600	75,100		4,506,000	7,510	49,566,000
									82,610
2,253	209	11,667	26,285,000	350	75,100		2,628,500	7,510	28,913,500
									82,610
2,253	209	6,667	15,020,000	200	75,100		1,502,000	7,510	16,522,000
									82,610
2,253	209	3,333	7,510,000	100	75,100		751,000	7,510	8,261,000
									82,610

RICS BCIS Median Q3 2025		Build		External Works		Total Costs (Build + External)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	10% £/Bed	Cost (£)
2,219	206.2	20,000	44,380,000	600	73,967		4,438,000	7,397	48,818,000
									81,363
2,219	206.2	11,667	25,888,333	350	73,967		2,588,833	7,397	28,477,167
									81,363
2,219	206.2	6,667	14,793,333	200	73,967		1,479,333	7,397	16,272,667
									81,363
2,219	206.2	3,333	7,396,667	100	73,967		739,667	7,397	8,136,333
									81,363

RICS BCIS Upper Quartile Q3 2025		Build		External Works		Total Costs (Build + External)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	10% £/Bed	Cost (£)
2,417	224.55	20,000	48,340,000	600	80,567		4,834,000	8,057	53,174,000
									88,623
2,417	224.55	11,667	28,198,333	350	80,567		2,819,833	8,057	31,018,167
									88,623
2,417	224.55	6,667	16,113,333	200	80,567		1,611,333	8,057	17,724,667
									88,623
2,417	224.55	3,333	8,056,667	100	80,567		805,667	8,057	8,862,333
									88,623

Source: RICS BCIS / CBRE Data

d. Contingency:

- i. The contingency rate adopted within the CIL Viability Addendum 2025 is maintained at 4.00%. Whilst PPE acknowledge that contingency is “understood to be in the region of 3% to 5% of build costs plus externals”⁸. PPE has apparently taken a ‘midpoint’ of 4.00% without providing any explanation of the relevance to varying development typologies and, greenfield and brownfield sites. In Section 5 of the Cil Consultation Statement, CYC and PPE resist CBRE’s recommendation to increase the contingency to 5% of build costs for brownfield sites, stating: “it is not necessary to include a contingency rate within high level studies such as this.”
- ii. In CBRE’s view, this response does not address the previous representations. CBRE’s position remains that this an unreasonably low allowance for brownfield sites in York. Such sites include significant site preparation works such as demolition of existing buildings and remediation. Redevelopment of brownfield sites therefore carries a greater level of risk in comparison to greenfield sites and often uncover additional costs to construction at commencement or during the development Programme. Moreover, brownfield sites in York commonly have a number of constraints including (or within close proximity to) listed buildings, an Area of Archaeological Importance and/or a conservation area.
- iii. As a cross check, CBRE has reviewed recent local plan evidence from nearby councils. CBRE notes that the Durham County Council Local Plan Viability Testing – Update, Date October 2023, CP Viability adopt a 5% contingency on build costs, externals and Part L costs for brownfield sites, in order to account for the increased construction risks experienced on such sites.
- iv. CBRE also notes that in the recent Planning Approval for a PBSA scheme at Coney Riverside, (planning ref: 22/02525/FULM) a contingency of 5% was agreed with the council’s reviewer during viability negotiations.
- v. CBRE is therefore of the opinion that the contingency rate for brownfield sites should be adjusted upwards from 4.00% to 5.00% to reflect an adequate allowance for contractor’s and developer’s risk in a city with known contingency issues.

e. Abnormals:

- i. The CIL Viability Addendum applies costs related to ‘abnormals’ within the brownfield land typology appraisals at £400,000 per net hectare and within the mixed greenfield/brownfield land typology appraisals at £200,000 per net hectare.
- ii. The CIL Viability Study references that these ‘high-level’ demolition and land remediation costs are informed by Homes England (formerly the HCA) guidance dated 2015⁹. CBRE has researched this guidance and it appears the publication was withdrawn on 24 May 2022. It therefore brings to question whether the CIL Viability Addendum should also rely on information withdrawn from the public domain and which provides out of date cost information, particularly given the high inflation environment impacting build costs since the date of publication (circa 8-9 years ago).

⁸ CIL Viability Study (December 2022)

⁹ Homes & Communities Agency, Guidance on dereliction, demolition and remediation costs (March 2015)

- iii. Nevertheless, it is also unclear how CYC has calculated the abnormal costs from the information set out in the Homes England guidance note or whether appropriate indexation has been applied to the costs (up to present day) to reflect significant cost inflation in recent years.
 - iv. CBRE has analysed the abnormal costs adopted within the CIL Viability Addendum for PBSA. These costs range from £20,000 to £652,000 based on site areas of between 0.05 and 1.63 net hectares.
 - v. Taking a stand back approach, this level of costs is unrealistically low and does not provide sufficient allowance for the abnormal costs associated with redevelopment of a brownfield site in York.
 - vi. CBRE has analysed the abnormals associated with the redevelopment of a number of brownfield sites in York. The abnormals costs cited include items such as demolition of existing buildings, site clearance, flood defence works, archaeology works, public realm, listed building works and conservation area. Other abnormal costs include land remediation.
 - vii. The abnormal costs cited by developers are significantly higher than the rates adopted within the CIL Viability Addendum. CBRE therefore requests that clarification is provided by PPE / CYC as to the methodology used for calculating site abnormal costs and whether the costs have been indexed appropriately.
- f. **Development Programme:**
- i. The CIL Viability Addendum does not set out a clear, detailed cashflow outlining development expenditure, finance roll up and revenue over the assumed development programme. The information provided is considered insufficient to undertake a detailed analysis of PPE's cashflow. CBRE requests that this information is provided by CYC to provide transparency and clarity to stakeholders.
- g. **Site Areas for Typologies:**
- i. It is not clearly stated within the CIL Viability Study or CIL Viability Addendum 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 provide transparency and clarity to stakeholders.
- h. **Benchmark Land Value:**
- i. The CIL Viability Addendum 2025 maintains the PBSA BLVs as follows:
 - 1. A BLV of **£450,000/ha (£182,000/acre)** for on campus PBSA on the basis that on campus PBSA is likely to occur only at Campus East where greenfield sites exist. This is the same rate as for greenfield residential testing.
 - 2. A BLV of **£1.5m/ha (£607,000/acre)** for off campus PBSA based on the assumption of *"city centre residential developments on brownfield sites considered no longer fit for purpose for their existing use"*¹⁰.

¹⁰ CIL Viability Addendum (November 2023)

- ii. The previous representations made by CBRE queried the logic of differentiating BLVs by future use. This indicates an element of 'hope value', which is explicitly excluded in PPG Paragraph 015. 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 as to the adopted BLVs 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. There remains 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 therefore remains unclear on the logic behind the BLVs in the CIL Viability Addendum, which have been extracted from the appraisals and reiterated in **Table 6** below. It sets substantially lower BLV for PBSA development in comparison to competing uses such as small local convenience and retail warehouse (both £2m/ha).

Table 6: CIL Viability Study & CIL Viability Addendum | Non-Residential BLV

Typology	BLV per gross area (hectares)
Retirement / Extra Care (Urban)	£1,120,000
Retirement / Extra Care (Village/ Rural)	£900,000
Small local convenience	£2,000,000
Retail warehouse	£2,000,000
On Campus PBSA	£450,000
Off Campus PBSA	£1,500,000

- vi. In addition, CBRE also notes that the CIL Viability Addendum adopts a BLV for residential typology viability testing of £1.7m/ha for brownfield land in its existing use as 'City centre / extension' land in Appendix A15.
- vii. The CIL Viability Study 2025 does not adequately justify why competing brownfield land uses have been viability tested against a higher BLV and PBSA against a lower BLV.
- 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. CBRE had made previous representations, providing recent market transactional analysis of sites brought forward for PBSA in recent years, in order to consider a higher BLV, as set out below:
1. 3 James Street, York: In September 2022, the 0.92-acre site was acquired by 77 York Limited for £4,040,200 (£4,391,522/gross acre). 303-bed PBSA scheme (planning ref: 22/00367/FULM).
 2. Fawcett Street, York: In June 2022, the 0.40-acre site was acquired by L&S York Ltd for £2,800,000 (£6,975,651/gross acre). 85-bed PBSA scheme (planning ref: 21/01570/FULM).
 3. The Coal Yard, Mansfield Street, York: In May 2018, the 0.38-acre site was acquired by Residential Capital (York) Ltd for £814,000 (£2,145,223/gross acre). Over 100-bed PBSA scheme (planning ref: 17/02702/FULM).
- x. CYC and PPE's response within the Consultation Statement did not address the setting of BLV. Rather PPE states that *"the sighted land value that CBRE provide .. does not inform us if the price paid is the minimum that the landowner would sell a site for after excluding hope value"*. CBRE queries the intent of this statement, as logically, no market transaction for a brownfield site would be able to 'minimum price that the landowner would sell' at.
- xi. CBRE continues to recommend that CYC seek to justify their disaggregated BLV pricing, and to source and consider such evidence in taking a 'stand back' approach and a York-specific market sense-check, and consider stratifying BLVs based on location, rather than potential future use, such as not to overstate the viability positions.

Results & Re-appraisal

54. The CIL Viability Addendum (2025) sets out the results of viability modelling within Table A7 on p.6. This is replicated below for ease.

Table A7 Off campus PBSA development viability and the psm CIL liable floorspace headroom

Typology	Headroom per CIL liable sqm	
	Addendum Nov 2023	Addendum Jun'25
10a: Student accommodation - 25 beds	£494	£1,391
10b: Student accommodation - 100 beds	£437	£1,311
10c: Student accommodation - 200 beds	£325	£1,175
10d: Student accommodation - 350 beds	£284	£1,115
10e: Student accommodation - 600 beds	£169	£975

55. CBRE notes that no viability appraisals are provided with the CIL Viability Addendum (2025) for validation and comment.
56. Table A7 presents PPE's headroom analysis which concludes that all off campus PBSA typologies can viably accommodate both CIL and an affordable housing OSFC contribution of £7,000 per student room as proposed under modifications published under CYC's Local Plan Policy H7: Off Campus Purpose Built Student Housing.

57. This is notwithstanding representations that the conclusions within Table A7 and the CIL Viability Addendum are not reflective of the full deterioration in market conditions over the past 3 years.
58. CBRE cannot support the levels of CIL headroom being identified within Table A.7 above for the PBSA typologies, for the reasons set out earlier within this representation.
59. For PBSA typologies only 25%-50% buffer is recommended for allowance in proposing the setting of the CIL charging rate at £150/m². CBRE considers this should be 50% at the very least across all typologies.

CBRE Updated Appraisal Modelling | Off-Campus PBSA Development (Private sector-led)

60. Given CBRE's analysis set out above firmly highlights both technical issues with the CIL Viability Addendum (2025) evidence base methodology and inputs, CBRE has run independent viability modelling on PBSA typologies to determine the implications for CIL headroom in the current market.

a. CIL Headroom Analysis | CBRE Modelling:

- i. In order to take a comprehensive approach, CBRE has utilised present-day input assumptions for off-campus (developer-led) PBSA development scheme typologies.
- ii. Firstly, CBRE has tested the off campus PBSA typologies with the adoption of the (absolute) minimum comparable room size for studios (at 20m²) in the York PBSA market along with an evidenced gross to net efficiency acceptable by CYC.
- iii. Secondly, CBRE has set the rental rates to £236/week to represent an average rate across the York market, representing a gross income of £11,560 per bed. OPEX is deducted at 30% of the gross annual rent to generate a net rental income. This is consistent with the CIL Viability Addendum inputs.
- iv. Thirdly, CBRE has capitalised the net rental income at a forward fund investment yield of 5.50%. 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 5.50% - 6.00% for prime regional locations, such as York. CBRE has taken an optimistic stance of adopting the lower end of this rate at 5.50%, which represents a strong / best case illustrative position.
- v. CBRE has increased the construction costs to reflect the BCIS upper quartile cost as published at July 2025. This is deemed the absolute minimum benchmark rate for current market construction costs for mid-market specification private-sector led PBSA schemes being brought forward in regional cities.
- vi. CBRE has additionally incorporated the cost of the affordable OSFC sought via Policy H7 (£7,000 per bedroom) and the Building Safety Levy at the Previously Developed Land rate (£15.81/m²), in line with the announcement of implementation from September 2026.
- vii. Finally, CBRE has adjusted the contingency allowance utilised in the CIL Viability Addendum modelling to reflect the higher figure referenced in the text of 5.00%.
- viii. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. As previously discussed, 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 Fusion to prepare CYC's evidence. A headroom analysis is presented in **Table 7**, below. Appraisal summaries are provided within **Enclosure 5**.

Table 7: Headroom Analysis (for CIL) Incorporating Modified Policy H7 OSFC | Developer-led PBSA Development

Off Campus Typology	PBSA	Headroom		After Buffer of:		
		£/CIL Liable sqm	50%	33%	25%	
10b	100-bed	-38	-19	-26	-29	
10c	200-bed	-123	-61	-82	-92	
10d	350-bed	-155	-78	-104	-117	
10e	600-bed	-242	-121	-162	-182	

Source: CBRE

61. 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 CIL at any rate above £nil.

Residential

62. CBRE notes the following observations on the CIL Viability Addendum:

- a. **City Centre Development:** CBRE previously noted the unique characteristics of York City Centre as an archaeological area of importance, situated within the historic core conservation area, and suffering from widespread high flood risk, all of which constrain development and introduce additional costs. Under Section 5 of the CIL Consultation Statement, CYC & PPE state that *“a precise cost for archaeological allowance has not been included”* and reference allowances made for brownfield site clearance and remediation costs, professional fees, and contingency. CBRE has addressed these assumptions independently and do not consider these to adequately account for the elevated costs of development in the city centre, in comparison to the rest of the city.
- b. **Repurposing Existing Floorspace:** CBRE has previously highlighted CYC’s longstanding ambition to see the City make better use of the spaces it has, notably conversion of upper floor retail space, which is generally redundant, into residential. CYC’s ‘Our City Centre Vision’ (previously ‘My City Centre Vision’) explicitly sets out the objective to *“encourage re-use of the under-used upper floors of buildings through planning support and business rates approach”*. P.23 of the document also states: *“Floors above commercial units are significantly underused, dominated by storage for retail units and empty space. Introducing different and mixed uses to the centre will allow more of this space to be actively used, but conversions of these buildings are complex.”*
- c. As the ‘My City Centre Vision’ document notes, conversion of these buildings are complex for a myriad of reasons. Some of the most notable being: planning challenges around bins / bikes / noise, City Centre access restrictions, achieving sound attenuation between commercial and residential uses and working in buildings of which a significant proportion are listed and all within a conservation area.
- d. Whilst development costs associated with conversion schemes are typically lower than new-build developments, there are additional costs associated with the difficulties of these projects. Moreover, policy requirements, notably those relating to sustainability, are likely to be more challenging and costly to meet when working with heritage assets. In addition, conversion developments would typically command lower values in comparison to new-build developments. This reflects a unique typology which cannot be accurately captured under PPE’s assessment of brownfield typologies and is, therefore, not reflected in the CIL Viability Addendum.

- e. Upper floors for conversion represent an important part of the housing supply for the City going forward, particularly at this time when York, along with many City Centre retail destinations are going through a period of significant change given the ongoing effect that online shopping has had on physical retail offerings and the decline in large format retail generally. Furthermore, these conversion projects help secure the long-term future of York's heritage assets, meeting a key objective of the Local Plan and the NPPF.
- f. If upper floor residential conversions are to be encouraged to meet the undersupply of residential property in the City, this approach should be explicitly tested within the CIL evidence basis, fully accounting for the specific challenges of this development typology.
- g. It is not appropriate for CYC or PPE to infer that the in-use credit would be appropriate, as this would necessitate floorspace having been utilised for six continuous months in the three years prior to a planning permission being granted. Many such buildings and upper floor spaces are redundant and will have been empty for considerable periods, meaning they will not qualify from in-use credit from CIL liability.
- h. If upper floor residential conversions are to be encouraged to meet the undersupply of residential property in the City, this approach should be explicitly tested within the CIL evidence basis, fully accounting for the specific challenges of this development typology or should be excluded altogether from CIL liability (i.e. £0 rated).

Build-to-Rent & Co-Living

- i. As high-density, multi-family housing developments, Build-to-Rent ('BTR') and Co-Living schemes are increasingly contributing towards housing delivery in cities and towns across the UK. The BTR sector is driven by institutional investment, providing high-quality, amenity-rich homes for rent. This now represents an established market in the UK's biggest cities, and has contributed significantly to the regeneration of brownfield land within these urban locations.
- j. Co-Living is a more nascent residential sector, itself a sub-sector of the BTR market, which is growing at pace across the UK. In the regional markets, co-living is beginning to take footholds, with Manchester leading the way in terms of beds delivered, and pipeline developments are expected in both Sheffield and Leeds.
- k. Whilst the BTR and Co-Living sector is yet to be established in York, it is expected that this market will develop throughout the plan period. Under Policy H2 (Density of Residential Development) of the adopted York Local Plan, higher density residential development is supported within the city centre, particularly in proximity to a high frequency public transport corridor.
- l. CBRE is aware of MODA Living's application (Ref: 22/01281/REMM) for 392 no. BTR units at 'Heworth Green', as part of the wider Heworth Gasworks redevelopment, which was granted in November 2022 and represents the first pipeline scheme. CBRE understands that MODA began a search to find a funding partner in August 2024 and remains underway.
- m. Currently, York does not represent an institutional BTR location, and there are more attractive locations (e.g. Leeds) to institutional investors. As a result, the prospective investor pool is more limited and achievable yields, capital values, and forward funding opportunities are subsequently reduced. Any BTR / Co-Living developments which are brought forward may need to be delivered on the basis of a speculative debt-funded stabilise and exit model, which is not a feasible option for many developers.

- n. The CIL Viability Addendum has failed to consider the impact of the proposed residential CIL charge upon BTR / Co-Living developments specifically. Application of CYC's proposed residential CIL charge of £150/m² to BTR / Co-Living developments would place further viability challenges on such schemes, and likely hinder their delivery.
- o. Considering this, CBRE requests that PPE undertake a full assessment of viability for BTR and Co-Living typologies, taking into account the specific characteristics of construction, operation, and sale of these assets. CBRE reserves the right to comment on this matter further at a later date.
- p. **Grey Belt Sites:** In December 2024, under the Labour Government's revision of the NPPF, the concept of 'grey belt' land was formally introduced to define land in the Green Belt comprising previously developed land and/or any other land which does not strongly contribute to the following purposes of the Green Belt:
 - i. To check the unrestricted sprawl of large built-up areas;
 - ii. To prevent neighbouring towns merging into one another;
 - iii. To preserve the setting and special character of historic towns;
- q. Paragraphs 156-157 of the NPPF set out the 'Golden Rules' for residential development in the Green Belt. In relation to affordable housing, this requires the provision of:
 - i. Affordable housing which reflects either development plan policies produced in accordance with paragraphs 67-68 of the NPPF; or until such policies are in place, the policy set out in paragraph 157 of the NPPF.
- r. It is CBRE's understanding that, whilst the adopted York Local Plan does adopt differential affordable housing requirements for brownfield and greenfield developments, this was not produced in the context of, and therefore does not satisfy the requirements of, paragraphs 67-68. Therefore, affordable housing provision on Grey Belt sites in York must default to the policy set out in paragraph 157 as follows:
 - i. 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.
- s. In the context of supply side constraints in the housing market in York, Grey Belt sites will be increasingly important in supporting housing delivery going forward. Based on the affordable housing requirements of Policy H10 of the adopted York Local Plan, and in accordance with paragraph 157 of the NPPF, Grey Belt sites in York will be subject to affordable housing requirements of 35%-45%. This has significant negative implications on development viability which has not been appropriately assessed as a specific typology within the CIL Viability Addendum. CBRE requests that this assessment is undertaken by PPE.
- t. **Residential Values:**
 - i. **Geographical Pricing:** CBRE previously critiqued the use of a fixed average sales values across both York city centre and areas outside the city 'core'. Within Section 5 of the CIL Consultation Statement, CYC & PPE state *"we understand that there will be variance at the lowest level given the proximity of schools, parks and other factors that drive differences in prices, but our understanding from our consultations informing the viability testing is that prices do not vary so much that this would require different value area zones across York."*

- ii. CYC & PPE reference the sales evidence provided within Appendix A1 of the CIL Viability Addendum, stating that *“the data indicates that over half (54%) of the transactions are within $\pm£500$ psm of the average figure of £3,792. 72% are within when the sample is extended to $\pm£750$ psm”* and therefore claim that *“such differences are unlikely to be of significance given the considerable headroom identified and the excess of a buffer that is used when setting the proposed CIL rates.”*
- iii. CBRE would argue that a difference in average value of $£500/\text{m}^2$ ($£47/\text{ft}^2$) to $£750/\text{m}^2$ ($£70/\text{ft}^2$) is not insignificant and could translate to significant viability impacts, likely eroding the entire identified CIL ‘headroom’ in most cases.
- iv. Without access to the supporting appraisals, it is not possible to determine the potential viability impact of more granular geographical pricing and CBRE requests that this sensitivity analysis is undertaken by PPE.

u. **Construction Costs:**

- i. **Flatted / Apartment Costs:** The CIL Viability Addendum adopts the RICS BCIS (median) midpoint rate between flats 1-2 storey and flats 3-5 storey over a 15-year (default) period at a cost of $£1,631/\text{m}^2$ ($£152/\text{ft}^2$) as at Q1 2025 for the construction of apartments across York. This reflects a 3.2% increase on construction costs adopted for the CIL Viability Addendum at Q2 2023. However, CBRE is of the opinion that this does not go far enough in fully reflecting inflation of construction costs during this period.
- ii. 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 the cost rate adopted within the viability modelling. It will substantially overstate the financial viability of flatted apartment development typologies.
- iii. CBRE has reviewed the latest RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, which represents a more up-to-date sample of tendered costs. On this basis, the RICS (median) midpoint rate between flats 1-2 storey and flats 3-5 storey equates to $£1,885/\text{m}^2$ ($£172/\text{ft}^2$), which is an increase of 13% from PPE’s adopted rate. This supports CBRE’s view that the sample relied upon by PPE is overstating the financial viability of apartment developments within their assessment. The data is provided within **Enclosure 4**.
- iv. Furthermore, in the context of the unique characteristics of the City as an area of archaeological importance, within a historic core conservation area with a high concentration of listed buildings, and a vast high flood risk area, CBRE is of the opinion that the RICS BCIS Median rate underestimates the cost of development in the city centre. CBRE would advocate that the RICS BCIS upper quartile rate should represent the minimum base construction cost for generic viability testing developer-led residential typologies. On the basis of the RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, a midpoint between the lower quartile rates for flats 1-2 storey and flats 3-5 storey equates to $£2,222/\text{m}^2$ ($£206/\text{ft}^2$), which is an increase of 36% from PPE’s adopted rate.
- v. **House Costs:** The CIL Viability Addendum adopts the RICS BCIS Estate Housing – Generally (median) rate of $£1,441/\text{m}^2$ ($£134/\text{ft}^2$) for medium housebuilders (4-49 units) and the Estate Housing – Generally (lower quartile) rate of $£1,274/\text{m}^2$ ($£118/\text{ft}^2$) for large housebuilders (50+ units).

- vi. CBRE has also cross-checked these rates against the latest RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, which represents a more up-to-date sample of tendered costs. On this basis, the Estate Housing – Generally (median) rate equates to £1,643/m² (£153/ft²) and the Estate Housing – Generally (lower quartile) rate equates to £1,380/m² (£128/ft²).
- vii. This indicates that the cost rates adopted within the viability modelling for houses is also unrealistically low, skewed by tenders which are no longer reflective of costs currently facing housebuilders. As such, the sample relied upon by PPE is overstating the financial viability of housing developments within their assessment.
- v. **Garages:** As discussed within paragraph 38a of this representation, The CIL Viability Addendum maintains a single garage cost of £9,000/unit. As previously highlighted by CBRE, the latest information provided to CBRE by housebuilders places the current cost at approximately £15,000 per single garage in 2025. Evidence of this from Yorkshire and the North West of England, indexed to Q3 2025¹¹, is summarised in **Table 9** below.

Table 9: CBRE Garage Cost Benchmarking

Site	Region	Cost Date	Avg Cost (excl. Abnormals)	Indexed Avg Cost (excl. Abnormals)
Site A	Yorkshire and the Humber	Jan-25	£14,164	£14,306
Site B	North Yorkshire	Jan-25	£15,180	£15,333
Site C	North West	Jul-25	£14,331	£14,331
Average			£14,559	£14,657

Source: CBRE

- i. As a result, the cost allowance in the CIL Viability Addendum is considered unreasonably low and not reflective of the construction costs facing housebuilders in the current market.
- w. **Other development costs:**
 - viii. **Contingency:** The contingency rate adopted within the CIL Viability Addendum is maintained at 4.00%. CBRE previously highlighted the elevated risk associated with the redevelopment of brownfield sites, particularly in York where constraints are multiple. Under Section 5 of the CIL Consultation Statement, CYC & PPE respond to this, stating “*in line with PPG Viability, it is not necessary to include a contingency rate within high level viability studies such as this.*” This fails to address the concerns raised by CBRE in previous representations.
 - ix. CBRE is aware of several recent evidence from Local Plan viability studies which adopt a contingency allowance of 5%. These are as follows:
 - a. Within the Oadby & Wigston Borough Council Community Infrastructure Levy Viability Study Stakeholder Workshop (June 2025), Aspinall Verdi adopted contingency at 5.0% for brownfield sites.

¹¹ Indexed using BCIS All-in TPI

- b. Additionally, within the Charnwood Borough Council Community Infrastructure Levy - Viability Study Stakeholder Workshop (May 2025), Aspinall Verdi adopted contingency at 5.0% for brownfield sites.
 - c. Birmingham City Council Birmingham Whole Plan Viability Assessment prepared by Aspinall Verdi in April 2024 adopts a contingency at 5.0% for brownfield sites.
 - d. Amber Valley Borough Council Local Plan Viability Assessment also prepared by Aspinall Verdi in February 2024 adopts a contingency at 5.0% for brownfield sites.
 - e. Durham County Council Local Plan Viability Testing Update prepared by CP Viability in October 2023 adopts a 5.0% contingency allowance for brownfield sites.
 - f. Ashfield District Council Whole Plan Viability Assessment prepared by NCS in March 2023 incorporates an allowance of 5.0% contingency with no differentiation between greenfield and brownfield sites.
- x. Within Yorkshire specifically, the latest CIL viability evidence produced relates to the Calderdale Council DCS, produced by Aspinall Verdi in June 2023. Aspinall Verdi adopt a 5% contingency allowance for brownfield sites.
 - xi. On this basis, there is clear evidence of consensus amongst professionals that 5% represents a reasonable contingency allowance for development of brownfield sites within the current market.
 - xii. Furthermore, CBRE notes that within the viability review of Helmsley Securities' application at 19 to 33 Coney Street (Ref: 22/02525/FULM), CYC's independent advisor, Stannybrook Property Consultants, accepted that a 5% contingency allowance was reasonable. This is a brownfield site within the City Centre, involving complex conversion of existing heritage assets. This indicates that CYC deem a 5% contingency allowance to be reasonable in site-specific circumstances on brownfield sites in York, and CBRE therefore questions why a reduced rate is advocated within this area wide assessment.
 - xiii. As such, CBRE maintains that the contingency rate for brownfield sites should be adjusted upwards from 4.00% to 5.00% to reflect an adequate allowance for contractor's and developer's risk.
- x. **Section 106 costs:**
 - i. The CIL Viability Addendum maintains the policy costs and Section 106 obligations assumed within the CIL Viability Study. These are extracted below for reference.

Table 4.13 Policy DM1/s106 costs per unit tested in this Addendum

Site	S106	Supplementary Education	Other key Infrastructure	Total cost	Cost per unit
Not Strategic Site specifics	£3,208,800	£3,112,461	£0	£6,321,261	£8,274
SS8 Land Adj Hull Road (ST4)	£886,200	£1,054,611	£1,000,000	£3,419,116	£13,000
SS9 Land East of Metcalf Lane (ST7)	£3,549,000	£9,992,240	£2,500,000	£16,041,240	£18,984
SS10 Land Nth of Monks Cross (ST8)	£4,065,600	£15,274,420	£3,000,000	£22,340,020	£23,079
SS11 Land Nth of Haxby (ST9)	£3,087,000	£12,955,738	£2,000,000	£18,042,738	£24,548
SS12 Land West of Wigginton Rd (ST14)	£5,661,600	£21,568,055	£11,900,000	£39,129,655	£29,028
SS13 Land West of Elvington Lane (ST15)	£14,023,800	£52,300,000	£74,900,000	£141,233,800	£42,295
SS14 Terry's Extension Sites (ST16)	£466,200	£0	£0	£466,200	£4,200
SS16 Land at Tadcaster Rd (ST21)	£663,600	£1,210,685	£0	£1,874,285	£11,863
SS18 Station Yard, Wheldrake (ST33)	£630,000	£1,777,059	£0	£2,407,059	£16,047
SS20 Imphal Barracks (ST36)	£3,229,800	£9,093,293	£0	£12,323,093	£16,025

Source: CYC, Key Infrastructure Requirements Updated Gantt [Exam doc: EX/CYC/70]

- ii. This demonstrates a total cost per unit ranging from £11,863 to £42,295 across the residential strategic sites. For non-strategic sites, PPE assume a blanket rate of £8,274/unit.
 - iii. CBRE notes that a significant proportion of these costs are driven by education contributions, which are underpinned by estimates of child yield. Different sites will generate different child yields, depending on the provision of family housing. As such, CBRE deems it is not reasonable to apply a single assumption for S106 education contributions to all site typologies.
 - iv. Residential developments delivering family housing, typically on greenfield sites, will be subject to a significantly higher education contribution, in comparison to a higher density non-family housing development. Considering the concerns raised within paragraph 53g of this representation regarding the elevated affordable housing requirement on Grey Belt sites, it should be considered that these sites are also likely to be subject to higher education contribution requirements, placing further pressure on development viability. When combined with CYC & PPE's proposed residential CIL rate of £150/m², this risks undermining the viability of these typologies.
 - v. Considering the variability and scale of S106 costs across the strategic sites, CBRE requests that PPE sensitivity test a range of education contributions to reflect a realistic variation and to ensure that the CIL Charging Schedule does not inadvertently stifle housing delivery.
- y. **BLV:**
- i. **Residential Typologies:** PPE formed opinions of residential land BLVs for the Local Plan viability assessment undertaken in 2018. Subsequently, for the purpose of the CIL Viability Study (December 2022), PPE reportedly used Savills Residential Land Value Index as a proxy to determine the change in current BLVs since the preparation of the Local Plan viability assessment.

- ii. As previously noted by CBRE, it appears that the CIL Viability Addendum does not rely on any new land transactional evidence since 2018. PPE has not sought to obtain up to date transactional evidence, which CBRE considers a significant oversight by PPE.
- iii. CBRE therefore remains unclear on the logic and relevance behind the BLVs adopted in the CIL Viability Addendum. The BLVs have been extracted from the residential appraisals and reiterated in table 10 below.

Table 10: CIL Viability Study & CIL Viability Addendum | BLV

Typology	BLV per gross area (hectares)
Residential (City Centre)	£1,700,000
Residential (Urban & Suburban)	£1,120,000
Residential (Village/Rural)	£900,000
Residential Agricultural /Greenfield	£450,000

Source: CYC

- iv. In previous representations, CBRE gathered market transactional evidence for sites brought forward for residential use as set out below.
 - 1. Eboracum Way, York: In December 2022, the 0.57-acre site was acquired by Modernistiq (Layerthorpe) Ltd for £2,900,000 (£5,102,669/gross acre). Residential scheme comprising 62 units (planning ref: 19/01467/FULM).
- v. Under Section 5 of the CIL Consultation Statement, CYC & PPE state *“the sighted land value that CBRE provide for the Eboracum Way scheme does not inform us if the price paid is the minimum that the landowner would sell a site for after excluding hope value, as is the criteria for setting BLV within PPG Viability.”* However, CYC & PPE fail to provide up-to-date transactional evidence to justify maintaining the rates set out in Table 10.
- vi. CBRE recommends that CYC seek to source and consider such evidence in taking a ‘stand back’ approach and a York-specific market sense-check.
- z. **Summary:** Overall, CBRE would advocate a cautious approach is taken by CYC to setting CIL rates in what continues to be a volatile housing market in 2025, particularly if CYC is minded to seek to maintain or increase levels of affordable housing provision as part of the overall housing supply.

Results & Re-Appraisal (Residential)

63. The CIL Viability Addendum sets out the results of the updated viability modelling within Table A3 on p.3. This is replicated below for ease.

Table A3 Viability of residential developments in CYC and their £psm CIL liable floorspace headroom

ID	Typology	Headroom per CIL liable sqm	
		Addendum Nov 2023	Addendum Jun'25
2	Centre/ City Centre Extension - Medium - 50 dwellings - Greenfield	£347	£100
3	Centre/ City Centre Extension - Small - 20 dwellings - Greenfield	£531	£279
4	Urban - Large - 45 dwellings – Greenfield	£335	£100
5	Urban - Medium - 25 dwellings – Greenfield	£366	£130
6	Urban - Small - 10 dwellings – Greenfield	£554	£373
7	Suburban - Large - 140 dwellings – Greenfield	£362	£140
8	Suburban - Medium - 38 dwellings – Greenfield	£290	£54
9	Suburban - Small - 8 dwellings – Greenfield	£499	£318
10	Village - Village - 122 dwellings – Greenfield	£245	£23
11	Village - Large - 33 dwellings – Greenfield	£298	£62
12	Village - Medium - 7 dwellings – Greenfield	£514	£333
13	Village - Small - 4 dwellings – Greenfield	£561	£380
14	Centre/ City Centre Extension - Large - 95 dwellings - Brownfield	£458	£240
15	Centre/ City Centre Extension - Medium - 50 dwellings - Brownfield	£514	£292
16	Centre/ City Centre Extension - Small - 20 dwellings - Brownfield	£561	£335
17	Urban - Large - 45 dwellings – Brownfield	£362	£150
18	Urban - Medium - 25 dwellings – Brownfield	£371	£158
19	Urban - Small - 10 dwellings – Brownfield	£487	£306
20	Suburban - Large - 140 dwellings – Brownfield	£421	£219
21	Suburban - Medium - 38 dwellings – Brownfield	£281	£68
22	Suburban - Small - 8 dwellings – Brownfield	£414	£233
23	Village - Village - 122 dwellings – Brownfield	£301	£99
24	Village - Large - 33 dwellings – Brownfield	£270	£57
25	Village - Medium - 7 dwellings – Brownfield	£416	£234
26	Village - Small - 4 dwellings – Brownfield	£463	£279
41	SS14 Terry's Extension Sites (ST16)	£310	£117
46	SS20 Imphal Barracks (ST36)	£363	£157

64. In paragraph 10, PPE state “despite the reductions in sales values and increases in build costs during the past 18 months in the City of York, all sites remain viable under the cumulative Local Plan policies in the current market.”
65. Table A3 presents PPE’s headroom analysis which concludes that all residential typologies can viably accommodate both CIL and the cumulative Local Plan policies, including 20% / 30% affordable housing, in the current market.
66. The headroom analysis maintains PPE’s previous conclusions that only Strategic Site 16 (‘SS14 Terry’s Extension Sites’) and Strategic Site 36 (‘SS20 Imphal Barracks’) can viably accommodate CIL.

67. It is evident that there has been a severe compression in the headroom based on PPA's updated viability evidence for almost all typologies tested.
68. This is notwithstanding representations that the conclusions within Table A3 and the CIL Viability Addendum are not reflective of the full deterioration in market conditions over the past 24 months.
69. CBRE cannot support the levels of CIL headroom being identified within Table A3 for residential typologies, for the reasons set out earlier within this representation.
70. On the basis of the levels of CIL headroom identified within Table A3, PPE state *"an average rate of £200 psm remains the highest amount that the generic sites could afford in the bulk of cases."* PPE apply a viability buffer of 25% to this to arrive at a CIL rate of £150/m² for non strategic residential sites.
71. Firstly, it appears that PPE's identified headroom of £200/m² reflects an average of the headroom identified for each residential typology tested (2 to 26). PPE's suggestion that, in the majority of cases, this reflects the 'highest amount' of CIL that the non-strategic sites could support is therefore incorrect.
72. On the basis of this flawed methodology, PPE apply a blanket residential CIL rate across all non strategic residential typologies, which reflect varying sizes and market contexts. Table A3 presents a number of residential typologies which PPE determine to generate a CIL headroom of less than £150/m² – these site typologies are medium and larger scale. On this basis, these typologies, which would be expected to account for a high provision of CYC's housing land supply would be unable to viably support the CIL charge proposed by PPE and would be rendered financially unviable.
73. It appears that many of the site typologies that demonstrate CIL headroom within Table A3 are limited to very small scale – frequently being 10 units or fewer.
74. Secondly, PPE state that *"a buffer of 25% is considered appropriate for setting CIL within the context of Planning Policy Guidance, which provides standard inputs, including the developer return, which guidance suggests should be between 15% and 20% of GDV, adjusting for risk, when establishing plan policies, including CIL."* CBRE notes that the PPG paragraph referenced by PPE (PPG Viability, Paragraph: 018 Reference ID: 10-018-20190509) provides guidance only on a reasonable allowance for developer's return and provides no guidance on viability buffers. CBRE notes that PPG advocates the application of a buffer in relation to CIL, however, appropriate levels of viability buffers are not explicit in the NPPF / PPG and should be based on a number of factors including local market conditions and development / delivery risk.
75. CBRE notes that within PPE's initial CIL Viability Study (December 2022), PPE included a 60% buffer, stating that *"the City of York is likely to soon have a Local Plan that will place non CIL funding obligations on future developments including new costs for meeting the Climate Emergency and affordable housing rates, which the development industry will need to absorb, and this might take time to bed in."* PPE also consider the context that *"there is also uncertainty in the economy that is currently heading into recession, and uncertainty in the planning system due to the current Government's narrative for introducing significant reforms."*
76. PPE acknowledges in their initial CIL Viability Study that a cautious viability buffer enables the marketplace to *"easily adjust to the new form of infrastructure funding along with the new Local Plan policies without coming forward to negotiate on viability grounds or amending or delaying delivery until they feel certain that it is worthwhile progressing with their current development proposal"*. It is evident in the CIL Viability Study that PPE view a higher viability buffer (60%) greater facilitates the delivery of homes, in the context of emergent legislation and Local Plan policy requirements. As such legislation and policies are now coming into effect, and PPE's CIL Viability Addendum (June 2025) indicates that viability has worsened through reduced values and rising costs, CBRE questions why PPE's stance on a reasonable viability buffer has shifted. It appears highly contradictory and represents a wholesale reversal of PPE's prior professional advice to CYC.

77. CBRE is aware of a research study¹² published by Lichfields planning consultants in August 2021, which presents analysis that indicates viability buffers ranged from 20-70% and noted higher buffers applied to larger and strategic sites.
78. CBRE considers that PPE's adopted viability buffer of 25% is beyond the lower end of expectations, particularly considering the trends in values and build costs observed by PPE, and given the technical deficiencies highlighted above. CBRE advocates that a viability buffer of 50%+ should be applied, in this context.
79. Regarding the two Strategic Sites assessed, PPE state that *"the updated viability results show them to have lower viability headrooms in the current market."* Following this, PPE state that *"the current proposed DCS rate of £100 psm would still result in viable developments, including a 17% viability buffer for ST16 and a 57% buffer for ST36."* On this basis, PPE claim that *"from this analysis, an appropriate rate for non strategic site delivery of residential dwellings at ST16 and ST36 remains at £100 psm."*
80. CBRE questions why, having stated that a 25% viability buffer is appropriate, PPE deems a 17% viability buffer to be acceptable for ST16. This is further undermined by PPE's view that a 57% buffer is appropriate for site ST36. Considering the underlying market dynamics and economic backdrop acknowledged both by PPE and CBRE, as outlined above, plus additional costs such as BSL, it is evident that a 17% viability buffer could easily be eroded and risk the viability of the scheme. As such, CBRE also advocates that a viability buffer of 50%+ should also be applied to all strategic sites, with any identified headroom for CIL adjusted downwards to accommodate this buffer, rather than the opposite.

CBRE Updated Appraisal Modelling | Residential

81. Given CBRE's analysis set out above firmly highlights both technical issues within the CIL Viability Addendum (2025) evidence base methodology and inputs, CBRE has independent viability modelling of a Residential typology to illustrate the implications for CIL headroom in the current market.

a. CIL Headroom Analysis | CBRE Modelling:

- i. CBRE has tested Typology 17 (Urban – Large – 45 Dwellings – Brownfield), against which PPE identify a CIL headroom of £150/m², reflecting an exact match of the recommended Residential CIL charge.
- ii. CBRE has increased the construction costs to reflect the BCIS Estate Housing – Generally (median) rate equates as published at July 2025, with tenders restricted to the last 5 years (£1,643/m² or £153/ft²). This is deemed an appropriate rate for medium housebuilders in the current market.
- iii. Secondly, CBRE has increased the construction cost of garages adopted within the CIL Viability Addendum modelling from £9,000 per garage to £15,000 per garage, reflecting the up-to-date evidence provided by CBRE.
- iv. Thirdly, CBRE has adjusted the contingency allowance utilised in the CIL Viability Addendum modelling to reflect CBRE's professional opinion of a reasonable rate of 5.00%.
- v. Finally, CBRE has incorporated the cost of Building Safety Levy at the previously developed land rate (£15.81/m²) to the open market floorspace delivered from October 2026, in line with the Government's anticipated implementation timeline.

¹² Lichfields (2021) Fine Margins, Viability Assessments in Planning and Plan-Making

- vi. 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 Fusion to prepare CYC's evidence.
- vii. CBRE adjusted appraisal of Typology 17 generates a Residual Land Value ('RLV') of £735,131, which falls below PPE's identified BLV for this typology of £1,109,550. On this basis, Typology 17 is **unviable** and there is no headroom for CIL. A copy of CBRE's Residential Appraisal is provided within **Enclosure 6**.
- viii. Evidently, the same adjustments to the other residential typologies would have an equivalent effect on viability and the headroom available to accommodate CIL. Considering that 11 of the 25 tested typologies are assessed by PPE to have CIL headroom equal to or below the recommended CIL charge of £150/m², CBRE's modelling illustrates that a significant proportion of tested typologies would be unable to viably support CYC & PPE's proposed residential CIL charge, in the context of current market conditions.
- ix. 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 Residential typologies to either meet the costs of CIL at any rate above £nil.

Failure to Strike an Appropriate Balance

- 82. In setting CIL rates, CYC 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)¹³, CYC 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.
- 83. As set out in PPG¹⁴, Charging Schedules should be consistent with, and support the implementation of, up-to-date relevant plans.
- 84. 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.
- 85. As also clearly set out in the RICS Guidance¹⁵, 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.
- 86. Moreover, CBRE concludes that it is illogical and counter-intuitive for CYC to introduce the proposed CIL rates for off campus PBSA and residential use development for the published CIL Viability Addendum 2025 document does not constitute up-to-date appropriate available evidence to underpin the proposed rates within the Revised CIL DCS.
- 87. As a result, Fusion would strongly contend that the Revised CIL DCS is unsound and should not be endorsed by the Examiner for the above fundamental reasons and further technical deficiencies expanded upon below.

¹³ CIL Regulations 2010 (as amended)

¹⁴ PPG CIL: Paragraph: 011 Reference ID: 25-011-20190901

¹⁵ RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14

88. If non-compliance could not be rectified via modification(s) or by recommendation from the Examiner, the Examiner would be requested to reject the Revised CIL DCS in accordance with Section 212A(2) of the 2008 Act.

Lack of Transparency

89. There is a lack of transparency in the CIL Viability Addendum 2025 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 Guidance¹⁶ and RICS Professional Standards¹⁷, and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.
90. The CIL Viability Addendum does not provide corresponding appraisals and cashflows to evidence PPE's revised advice.
91. Without appraisals, it is not clear which assumptions have been adopted, maintained, or updated since the previous CIL Viability Addendum (November 2023). Furthermore, without associated cashflows, stakeholders are unable to see stabilisation and exit periods corresponding to gross development value ('GDV'), monthly apportionment of construction and other costs and finance roll-up.
92. This means the actual viability testing evidence utilised to set proposed CIL rates is not published in its entirety, not available to the examination (i.e. Inspector or stakeholders), and cannot be interrogated appropriately.
93. As CYC's evidence has been produced by a professional 'expert' ('PPE'), then the principles applying to the role of an expert in civil litigation should apply equally to a CIL examination. In *The Ikarian Reefer* [1993] F.S.R. 563 Cresswell J confirmed (p.565-566) that an expert must make available the evidence that has informed their opinion with that data to be shared upon publication of the relevant reporting. This principle should also apply to the preparation of evidence to inform a CIL examination, and yet CYC and PPE has not provided the viability testing/appraisal evidence.
94. The Courts have also held that it is a basic requirement of a consultation, if it is to be fair and useful, for respondents to be given access to the evidence that has informed the consultation proposals such that stakeholders can understand why the consulting body has reached the decisions made, and in turn to examine the evidence and judgements arising. Withholding such evidence in the process of examining the CIL Draft Charging Schedule prevents stakeholders from undertaking this basic activity and hence undermines the effectiveness and fairness of the process. It follows that the Inspector will also be deprived of the ability to interrogate the evidence in the process of examination.
95. Should the Inspector move to recommend adoption of the Revised CIL Draft Charging Schedule, given the above failings, the subsequent adoption would present a risk of being found to have been unlawful having arisen from a consultation and examination process that is procedurally flawed.

¹⁶ RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note

¹⁷ RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition

Conclusions and Recommendations

96. Fusion cannot endorse or support the Revised CIL DCS, and its underpinning evidence base in the form of the CIL Viability Addendum 2025, as presently published.
97. In fact, for the reasons set out in this document and its enclosures, Fusion has fundamental doubts regarding the appropriateness of the timing of this consultation on a new CIL DCS.
98. Fusion 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 and residential use development within the Revised CIL DCS is reliant, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.
99. On this basis, Fusion cannot agree with CYC that there is an appropriately evidenced and legally compliant basis upon which the Revised 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.
100. Fusion therefore hopes that this feedback 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.
101. To rectify the issues identified, Fusion advocate that the CIL rates proposed to apply to off campus PBSA development and residential development should be reduced to £0/m² via modification to the published Revised CIL DCS or CYC's pursuing of a CIL regime altogether held in abeyance until economic and property market conditions demonstrably improve.
102. If CYC does not take account of these recommendation, Fusion 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.
103. Should CYC wish to engage directly with Fusion 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	CL 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	Draft Charging Schedule Published	01/06/2023	Nine residential housing charging zones with rates of £0 to £50 per square metre for Greenfield residential sites, £0 per square metre for all brownfield residential sites. Residential institutions and care home development rate of £60 per square metre for both greenfield and brownfield sites, £0 per square metre charge for all other uses.	£0 per square metre for all other uses.	£0 per square metre for all other uses.
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	Abandoned	19/01/2021	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 CL. 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.
Wakenfield	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: York PBSA Comparable Schedule

Rental Market Data

Development	Developer	Development Description	Link	Date	Post Code	Address	Accommodation Type	Description	Term	m²	ft²	Rent PW (£)	Rent PA (£)	Net Rent PA (£)	Net Rent PW	Comments
Albion	Homes for Students	communal lounge, games room		Aug-25	YO1 9PN	Percy's Lane, York	Studio	Twin Studio	51	30.0	323	£360	£8,360		£360	2 x 3/4 beds
							Cluster Room	Classic En Suite	51			£199	£9,149		£199	
							Cluster Room	Classic En Suite	48			£208	£9,884		£208	
							Cluster Room	Deluxe En Suite	51	14.0	172	£216	£9,465		£216	recently refurbished
							Studio	Classic Studio	51	20.0	248	£250	£12,750		£250	recently refurbished
							Studio	Premium Studio	51	20.0	301	£275	£14,025		£275	recently refurbished
							Studio	Classic Studio	51			£255	£13,005		£255	
							Studio	Classic Bigger Studio	51			£270	£13,770		£270	
Frederick House	Student Resort	communal lounge, gym, games room		Aug-25	YO12 4EA	Hillford road, York	Cluster Room	En Suite	51	13.0	140	£189	£8,639	£6,639	£189	£9000 cashback offer for 40+ weeks
							Cluster Room	Bedroom Bronze Chained B	51	10.0	108	£177	£8,027	£6,027	£177	£9000 cashback offer for 40+ weeks
							Cluster Room	Bedroom Bronze Chained B	51	10.0	108	£175	£8,025	£7,025	£175	£9000 cashback offer for 40+ weeks
							Studio	Studio Bronze	51	7.0	83	£199	£10,149		£199	£9000 cashback offer for 40+ weeks
							Studio	Studio Silver	51	18.0	194	£219	£11,869	£10,369	£199	£9000 cashback offer for 40+ weeks
							Studio	Studio Gold	51	34.0	366	£289	£14,739	£13,739	£289	£9000 cashback offer for 40+ weeks - Sold Out
Lawrence Street	Vita	movie room, private study, lounge		Jun-24	YO10 3FT	Lawrence Street, York	Studio	Classic Studio	51	19.0	205	£240	£17,340		£240	
							Studio	Classic Plus Studio	51	19.0	205	£395	£18,105		£395	
							Studio	Deluxe Studio	51	19.0	205	£292	£14,892		£292	
							Studio	Accessible Studio	51	26.0	280	£288	£18,768		£288	
							Studio	En Suite	51	15.0	161	£260	£13,255		£260	
							Cluster Room	En Suite	51			£222	£16,422		£222	
							Studio	Classic Bigger Studio	51			£255	£13,005	£12,435	£244	Vouchers worth £570
							Studio	Classic Smaller Studio	51			£270	£13,770	£13,200	£259	Vouchers worth £571
The Boulevard	Student Resort	high speed wifi, lakes access		Aug-25	YO10 3JG	6-8 Hill Road, York	Studio	Classic Bigger Studio Chyt	51			£275	£14,025	£14,455	£264	Vouchers worth £572
							Cluster Room	En Suite	51	16.0	181	£189	£8,639	£8,639	£189	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite	44	16.0	181	£273	£12,072	£11,072	£260	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Bronze	51	16.0	181	£199	£10,149	£9,149	£179	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Bronze	44	16.0	181	£209	£9,196	£8,196	£186	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Bronze Plus	51	16.0	181	£229	£11,979	£10,979	£209	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Bronze Plus	44	16.0	181	£245	£10,760	£9,760	£222	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Silver	51	18.0	194	£235	£11,985	£10,985	£215	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Silver	44	18.0	194	£249	£10,956	£9,956	£226	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Silver Plus	51	18.0	194	£245	£12,445	£11,445	£225	£9000 cashback offer for 40+ weeks
							Cluster Room	En Suite Gold	51	26.0	269	£269	£12,699	£11,699	£229	£9000 cashback offer for 40+ weeks
							Studio	Studio Bronze	51	20.0	215	£229	£11,979	£10,979	£209	£9000 cashback offer for 40+ weeks
							Studio	Studio Bronze Plus	51	20.0	215	£235	£11,985	£10,985	£215	£9000 cashback offer for 40+ weeks
							Studio	Studio Silver	51	26.0	280	£239	£12,389	£11,389	£219	£9000 cashback offer for 40+ weeks
							Studio	Studio Gold	51	22.0	237	£249	£12,699	£11,699	£229	£9000 cashback offer for 40+ weeks
							Studio	Studio Platinum	51	22.0	237	£269	£13,719	£12,719	£240	£9000 cashback offer for 40+ weeks
The Brickworks	IO Student			Aug-25	YO31 7AD		Studio	Studio Gold Terrace	51	24.0	344	£299	£13,209	£12,209	£288	£9000 cashback offer for 40+ weeks
							Studio	Gold Studio	51	23.0	248	£301	£15,301	£14,451	£291	£500 Cashback
							Studio	Platinum Studio	51	24.8	268	£335	£17,085	£16,385	£326	£500 Cashback
							Studio	Standard Studio	51			£249	£12,699		£249	Sold Out
The Coal Yard	Prestige Student Living	high speed wifi, communal lounge		Aug-25	YO31 7AJ	Marsfield Street, York	Studio	Gold Studio	51			£269	£15,249		£269	Sold Out
							Studio	Platinum Studio	51			£285	£14,335		£285	Sold Out
							Studio	Silver Studio	51			£275	£14,025		£275	
							Cluster Room	Standard En Suite	44	105	105	£198	£8,712		£188	
Willingale	Student Castle			Aug-25			Cluster Room	Clifford Flat	51	16.2	184	£228	£11,028		£228	
							Studio	Raven	51	19.0	205	£278	£14,178		£278	
							Studio	Lancaster	51	22.2	239	£295	£15,045		£295	
							Studio	Raven Deluxe	51			£270	£13,770		£270	

Enclosure 3: Investment Yield Guides – Q3 2025

All yields remain unchanged. Supermarkets trending stronger due to depth of demand.

► **Retail**
High Street continues to show positive trends in best locations.

► **Out of Town Retail**
Cautious optimism remains.

► **Industrial**
Depth of interest remains although a large number of secondary logistics assets are due to be marketed post-summer.

► **Offices**
Strong demand for prime assets and realistically priced refurbishment opportunities especially in Central London markets.

Changes in red/ Last month in brackets

	Mar 2025 (%)	Apr 2025 (%)	May2025 (%)	Jun 2025 (%)	Aug 2025 (%)	Trend
OFFICES						
West End (Mayfair/St James's)	4.00	4.00	4.00	4.00	4.00	Stronger
West End Non-Core	4.75	4.75	4.75	4.75	4.75	Stronger
City of London	5.75	5.75	5.50	5.50	5.50	Stronger
M25/South-East	7.25	7.25	7.25	7.25	7.25	Weaker
Regional Cities	6.50	6.50	6.50	6.50	6.50	Weaker
Good Secondary	10.00	10.00	10.00	10.00	10.00	Weaker
Secondary	14.00	14.00	14.00	14.00	14.00	Weaker
INDUSTRIAL						
Prime Distribution	5.25	5.25	5.25	5.25	5.25	Stable
Prime Estate (Greater London)	4.75	4.75	4.75	4.75	4.75	Stable
Prime Estate (Ex Greater London)	5.00	5.00	5.00	5.00	5.00	Stable
Good Secondary	6.50	6.50	6.50	6.50	6.50	Stable
Secondary Estate	7.50	7.50	7.50	7.50	7.50	Stable

CBRE RESEARCH

	Apr 2025 (%)	May 2025 (%)	Jun2025 (%)	Jul 2025 (%)	Aug 2025 (%)	Trend
HIGH STREET SHOPS						
Prime	6.75	6.75	6.50	6.50	6.50	Stronger
Good Secondary	9.00	9.00	9.00	9.00	9.00	Stable
Secondary	12.00	12.00	12.00	12.00	12.00	Weaker
SUPERMARKETS						
Prime	5.00	5.00	5.00	5.00	5.00	Stronger
SHOPPING CENTRES						
Prime	8.25	8.25	8.25	8.25	8.25	Stable
Best Secondary	12.00	12.00	12.00	12.00	12.00	Stronger
Secondary	16.00	16.00	16.00	16.00	16.00	Stable
RETAIL WAREHOUSES						
Park – Prime – Open User	5.50	5.50	5.50	5.50	5.50	Stable
Park – Prime – Bulky User	5.75	5.75	5.75	5.75	5.75	Stable
Solus – Prime – Bulky User	5.50	5.50	5.50	5.50	5.50	Stable
Park - Secondary	7.25	7.50	7.25	7.25	7.25	Stable

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All sectors remain unchanged.



Investor sentiment remains strong primarily for value-add opportunities. Operationally, revenue inflation has slowed, and owners are working hard to maintain profit.

Changes in red/ Last month in brackets

	Apr 2025 (%)	May 2025 (%)	Jun 2025 (%)	July 2025 (%)	Aug 2025 (%)	Trend
LEISURE						
Prime Leisure Park	8.00	8.00	8.00	8.00	8.00	Stable
Good Secondary Leisure Park	12.00	12.00	12.00	12.00	12.00	Stable
Cinema Prime	8.50	8.50	8.50	8.50	8.50	Stable
Health & Fitness Prime	6.00	6.00	5.75	5.75	5.75	Stronger
HOTELS						
Prime London Vacant Possession	5.00	5.00	5.00	5.00	5.00	Stable
Prime London Management Contract	6.25	6.25	6.25	6.25	6.25	Stable
Prime London Lease	4.50	4.50	4.50	4.50	4.50	Stronger
Prime Regional Vacant Possession	7.50	7.50	7.50	7.50	7.50	Stable
Prime Regional Management Contract	8.50	8.50	8.50	8.50	8.50	Stable
Prime Regional Lease	5.00	5.00	5.00	5.00	5.00	Stronger

	Apr 2025 (%)	May 2025 (%)	Jun 2025 (%)	July 2025 (%)	Aug 2025 (%)	Trend
PUBS						
Prime London Corporate Pub	4.50	4.50	4.50	4.50	4.50	Stable
Prime Regional Corporate Pub	8.00	8.00	8.00	8.00	8.00	Stable
ROADSIDE & AUTOMOTIVE						
Car Showroom Prime RPI Lease	6.00	6.00	6.00	6.00	6.00	Weaker
Petrol Filling Station Prime RPI Lease	5.75	5.75	5.75	5.75	5.75	Stable
Car Park Prime RPI Lease	7.00	7.00	7.00	7.00	7.00	Weaker
FINANCIAL INDICATORS						
Base Rate	4.50	4.25	4.25	4.25	4.00	▼
5 Year Swaps	4.05	3.98	4.10	3.98	3.96	▼
10 Year Gilts	4.63	4.59	4.64	4.58	4.57	▼
RPI	3.40	3.20	4.50	4.30	4.40	▲
CPI	2.80	2.60	3.50	3.40	3.60	▲

Static yields, but stabilising rental growth in the Student Sector.



► Residential

Positivity drawn from increasing pipeline and investment activity, but limited evidence of prime assets trading. The increasing size of the pipeline indicates that market activity levels are increasing but it is unlikely that there will be any yield compression in the foreseeable future.

► Student

Investor optimism persists due to UCAS results, potential rate cuts and solid long-term sector fundamentals, but the September letting cycle is key. Rental growth is stabilising after years of strong performance. Incentives are being used to secure early occupancy, while others are holding out for a late and great surge of bookings. The September outcome may affect investor sentiment and yields.

	Apr 2025 (%)	May 2025 (%)	Jun 2025 (%)	Jul 2025 (%)	Aug2025 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	4.15	4.15	4.15	4.15	4.15	Stable
London Zone 2 Good Secondary	4.50	4.50	4.50	4.50	4.50	Stable
London Zone 3 to 6 Prime	4.25	4.25	4.25	4.25	4.25	Stable
London Zone 3 to 6 Good Secondary	4.50	4.50	4.50	4.50	4.50	Stable
South-East Prime	4.25	4.25	4.25	4.25	4.25	Stable
South-East Good Secondary	4.50	4.50	4.50	4.50	4.50	Stable
Regional Cities Prime	4.35	4.35	4.35	4.35	4.35	Stable
Regional Cities Secondary	4.75	4.75	4.75	4.75	4.75	Stable
Other Regional Centres Prime	4.50	4.50	4.50	4.50	4.50	Stable
Other Regional Centres Secondary	5.25	5.25	5.25	5.25	5.25	Stable

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	Apr2025 (%)	May2025 (%)	Jun 2025 (%)	Jul 2025 (%)	Trend
SINGLE FAMILY HOUSING					
South-East Prime	4.15	4.15	4.15	4.15	Stable
North-West Prime	4.35	4.35	4.35	4.35	Stable

HEALTHCARE					
Care Homes Prime (Not for Profit)	4.75	4.75	4.75	4.75	Weaker
Care Homes Prime (SPV)	5.75	5.75	5.75	5.75	Weaker
Care Homes Secondary	8.00	8.00	8.00	8.00	Weaker
STUDENT ACCOMMODATION					
Central London Direct Let	4.25	4.25	4.25	4.25	Stable
Prime Regional Direct Let	5.00	5.00	5.00	5.00	Stable
Secondary Regional Direct Let	8.50	8.50	8.50	8.50	Stable
Central London RPI Lease	4.25	4.25	4.25	4.25	Stable
Prime Regional RPI Lease	4.25	4.25	4.25	4.25	Stable
Secondary Regional RPI Lease	5.50	5.50	5.50	5.50	Stable

MARKETBEAT INVESTMENT

MAY 2025

Better never settles

STEADY AS SHE GOES...

In terms of metrics, the first quarter was one of relative stability. We saw £13.4 billion transact. That means that rolling annual investment volumes remain at £55 billion – in line with where we were at the end of Q4. On a rolling basis, this is 29% up on last year, but on a quarterly basis just 1.7% up on the same period last year.

While there was widespread movement in the financial markets, as of the end of April, there was relatively little yield movement across prime markets, with stability remaining the case across 39 of our reported 45 markets over the last quarter. This leaves six markets where we have seen inward yield movement – with two in retail, three across offices and one in the living sector.

There was a very small reversion to negative yield impact across the MSCI Quarterly Index. However, capital values increased by 0.4% q-o-q, leaving quarterly total returns at 1.6%, while annual total returns were at 6.5%. All sub-sectors bar one (South East offices) are positive year-on-year. Shopping centres (10.7%) and retail warehouses (12.3%) continue to be the strongest performers, with industrial (9.2%) performing strongly.

...OR THE EYE OF A STORM?

This has all been against a backdrop of significant market volatility. As you'll pick up through our views across the sectors, there continues to be a 'wait and see' approach from investors on the trade and turmoil that we saw from the start of April. In a number of cases, this is playing out through a lack of investment stock coming to the market, and a variation of opinion on direction of pricing, as well as a polarisation across markets. Considering the volatility that we have seen, this is to be understood and may be for good measure, as we are starting to see an alleviation of the initial barriers laid out in early April.

For more information, we cover the impacts in more detail in our *Economy and Housing Marketbeat*.



Jason Winfield
Head of UK Capital Markets



Daryl Perry
Head of UK Research & Insight

KEY TAKEAWAYS



Q1 investment volumes were at £13.4 billion, leaving a rolling annual investment volume of £55 billion, 29% up on this time last year.



MSCI Capital values increased by 0.4% q-o-q, and are up 1.5% y-o-y. This leaves annual total returns at 6.6%.



According to our Prime Yield coverage, there was no movement during the month, with six of our 45 markets registering some inward yield movement over the last three months.



On 8th May, the MPC voted to cut the base rate to 4.25%, with a hawkish short-term view on inflation, and the prospects for short-term GDP growth.



There remains significant market volatility, impacting investor sentiment.



Martin Lay
Head of London Offices Capital Markets

CENTRAL LONDON OFFICES

Market Trends – With £2.56 billion transacting, Q1 2025 reported a 40% increase compared to the same period in 2024 and was 7% up versus the five-year quarterly average. However, just £900 million of assets have been brought forward in the City in the first quarter, meaning options for investors are limited. Yields remained stable at 5.75% for the City and 4.00% for the core West End for a fifth consecutive quarter.

Dynamics - Despite limited stock and transactional volumes, sentiment remains positive on net. Central London offices continue to generate demand across different sectors and profiles of buildings from a global audience, including American private equity firms, European and Israeli private investors, and Middle Eastern buyers. Short-income, value-add opportunities are also continuing to attract good interest.

Outlook – The outlook remains pegged on interest rate cuts later in the year. With positive indicators across the broader UK economy – despite international tariff-related turbulence – base rate cuts may release the handbrake on the market, offering greater confidence in pricing amongst prospective sellers and encouraging them to bring assets to market. In turn, this may potentially stoke an increase in volumes in the second half of the year.

BAROMETER DEAL



20 Manchester Square
Yield – 5.1% NIY
Price – c. £120m
Status – Sold
Comments – Brand new Grade A Office let to Lazard for 15 years. Purchased by Delancy



Jeremy Beckett
Head of National Offices Capital Markets

REGIONAL OFFICES

Market Trends – Q1 investment volumes across the regional markets totalled £296.7 million, representing a 61.2% decline from the previous quarter and 70.0% below the five-year quarterly average. This marked the lowest quarterly total since 2012.

Dynamics – Investor focus in regional markets remains firmly on best-in-class assets, exemplified by the landmark sale of EQ in Bristol for £104 million, which completed in January after exchanging at the end of Q4. The composition of capital sources is also shifting, with overseas investors - particularly from Israel and French SCPIs - now dominating the market, while US private equity has scaled back its presence. This was further illustrated by French real estate fund Iroko Zen's £27 million acquisition of the Brinell Building in Brighton.

Outlook – While anticipated rate cuts are expected to boost investor appetite, lower cost capital targeting prime deals is likely to remain opportunistic rather than allocated. Focus is expected to stay on the Big Six regional cities, particularly as supply continues to tighten and the development pipeline remains constrained in the near term. Edinburgh is likely to remain a key target for capital, with recent activity - such as Pontegadea's reported £7.5 million acquisition of Capital Square - highlighting its ongoing market premium relative to other regional cities.

BAROMETER DEAL



Capital Square, Edinburgh, EH3
Yield – 5.80%, with inbuilt reversion expected.
Capital Value - £615 psf
Status – Sold
Comments - Bought by Pontegadea – their second acquisition in Edinburgh.



Rory MacGregor
Partner, Life Sciences

LIFE SCIENCES

Market Trends – In Q1 2025, investment volumes in the Golden Triangle life sciences real estate market totalled £121.5 million across two transactions. While Q1 volumes reflect a 72% decline from the strong Q4 2024 finish, much of that activity was driven by deals agreed in earlier quarters and closed before year end.

Dynamics – The anticipated development pipeline, alongside a period of slower occupier take-up, has encouraged a more selective approach from investors toward new developments and secondary assets, as demand is expected to remain concentrated on best-in-class real estate. Even so, several significant lettings have contributed to a minor improvement in confidence in development, particularly within the core clusters where new build, best in class, assets are being delivered.

Outlook – With many investors holding substantial development pipelines, the short-to-medium-term focus is likely to remain on delivering these projects. This reflects a measured approach as investors navigate ongoing macroeconomic and geopolitical uncertainty, awaiting greater clarity on its direct impact on the life sciences real estate sector.

BAROMETER DEAL



270 Cambridge Science Park, Cambridge
Yield – 4.50%
Capital Value - £562.50 psf
Status – Sold
Comments – Brockton Everlast expanded Cambridge Science Park portfolio through this acquisition.



Ed Cornwell
International Partner, UK Logistics &
Industrial Capital Markets

LOGISTICS & INDUSTRIAL

Market trends – Investment during the first quarter totalled £1.2bn across 40 deals, marking a notable step change relative to the large volume – just shy of £4bn – that had been recorded during Q4. In the first quarter, just four portfolios transacted, and the largest 5 deals accounted for half of the total Q1 volume.

Dynamics – Following what had been a year in which purchaser-vendor aspirations had been more closely aligned, the opening months of 2025 and early Q2 has pointed to a widening in price expectations. This comes as a result of uncertainty around financial markets, and questions with regard to the outlook for the occupier market which have reduced the pool of willing vendors. Competition for the limited pool of prime assets remains healthy with bid levels still healthy and pointing to continued confidence in the market. The addition of North American private equity to the buyer pool has helped support competitive tension, following a slight reduction in activity from institutional capital in recent quarters.

Outlook – Some larger properties and portfolios are gradually being introduced to the market which should sustain activity through 2025. However, we do not anticipate any significant structural changes, continued resilience in the occupier market will help to retain investor interest in the sector.

BAROMETER DEAL



Bedford Commercial Park, Bedford
Yield – c. 5.6%
Pricing – c. £100 million
Status – Marketing
Comments – Modern asset fully let to low risk tenants



Marcus Wood
International Partner, UK Retail & Leisure
Capital Markets

RETAIL & LEISURE

Market trends – The retail investment market continues to see widespread positivity and consistent interest across all sub sectors. Investment volumes during 2025 so far remain modest, although this is largely a result of limited supply which in places is frustrating investors looking to deploy into the sector.

Dynamics – Transactions across the component sub-sectors remains mixed with some sub-sectors such as food-stores and shopping centres being impacted by limited levels of suitable supply. Despite this, the limited transactional evidence points to strong investor interest across both core and opportunistic markets. A handful of bellweather deals this year have helped to highlight the renewed interest in retail assets and a broadening of the buyer pool. The out of town market continues to see strong levels of activity, with Q1 volumes outperforming both last years Q1 value and the long term Q1 average.

Institutional capital has become increasingly comfortable in this market, with major players such as Hines now actively acquiring well connected schemes at a relative pace.

Outlook – Much of the current pipeline remains for stock launched during late 2024, meaning limited new supply may continue to weigh on volumes. However, a number of notable assets remain under offer which will likely help sustain the consistent positive sentiment seen already.

BAROMETER DEAL



Sears Retail Park, Solihull
Yield – 5.91%
Pricing - £70.5 million
Status – Exchanged
Comments – Starwood under offer to UK Institution



Ed Fitch
Head of Hospitality UK&I

HOTELS

Market trends – The first quarter of 2025 has been marred by uncertainty coming out of the US, but in spite of this, private equity investors remain interested in the sector. Momentum remains for larger deals (portfolios and key gateways), however local investors appear more hesitant to invest given the turbulent state of the economy.

Dynamics – There has been a steady flow of smaller individual assets coming to market as some larger portfolios rationalise non-core parts of their estate. Private owner-operators remain active and well-capitalised but cautious citing economic uncertainty and the impact of UK Government tax rises on operating costs.

Outlook – Investment volumes are likely to be constrained in the first half of the year by an ongoing mismatch between buyers and sellers, particularly in the regions. Major London opportunities remain scarce and may be expected to attract a deep pool of capital given perceived fundamentals.

BAROMETER DEAL



Confidential Portfolio, Various UK Locations
Yield – P&C
Size – C. 3,000 Beds
Status – Sold
Comments – Value-add Operating Platform



Peter Farnes
Head of Healthcare Investment

HEALTHCARE

Market Trends – So far in 2025 we have volumes of £854 million on the year to date, the largest of which was the Four Seasons Care Home sale. To date, 75% of the transactions have been undertaken by Healthcare Specialists, which shows their conviction to the sector. 66% of all transactions to date have been deployed from US capital which is showing no signs of slowing down.

Dynamics – The market as it stands is polarised, with the specialist investors looking to buy the best quality stock, looking for those A* assets with yields under 6.25%. At the other end of the market, large US based investors are looking for those value-add properties at the above 10% yield range. This leaves the mid-market as an opportunity for capital to deploy at 6.5% to 9.5%. We are seeing a number of potential take-private transactions with KKR potentially buying Assura and the US Care Trust REIT potentially purchasing the Care REIT.

Outlook – We will see the appetite for prime assets continue in both care homes and hospitals, but pricing and scale will be key. It remains to be seen how the US investors will react in the long term.

BAROMETER DEAL



Sherwood Grange Care Home, Kingston
Yield – P&C
Price – £14.2 Million
Status – Sold
Comments – Large leased portfolio of secondary care homes now under offer.



James Dunne
Head of Living

BUILD-TO-RENT

Market Trends – In Q1 2025, BTR investment reached £1.1 billion, representing an 11% year-on-year increase. Despite the combined impact of cost of debt and rising construction costs on viability, investors are actively exploring diversified entry strategies. Joint ventures, in particular, are becoming a more prominent feature of the market.

Dynamics – The sector continues to attract increasing volumes of capital, with a focus on core-plus and value-add strategies. Core capital remains largely sidelined, as macroeconomic uncertainty and a series of external shocks have delayed key investment decisions. There has been a noticeable rise in the availability of operational assets in regional markets, demonstrated by recent launches such as L&G's York & Elder in Brighton and LGIM's Whitmore Collection in Birmingham.

Outlook – Development remains the primary route to market for many investors. However, the pipeline of operational assets is expected to grow in 2025. While elevated debt costs have been a barrier for core capital, improvements in the debt environment are anticipated to support its gradual return to the sector.

BAROMETER DEAL



Equipment Works, London
Yield – TBC
Price - £126 million
Status – Sold
Comments - 257 Homes



James Woolley
Head of Student Accommodation

PBSA

Market Trends – Approximately £850 million has been transacted so far this year—below long-term averages but ahead of activity levels seen after the mini-budget. Around £2.5 billion worth of assets are currently being marketed, including Apollo's £600 million portfolio, Sanctuary's £500 million offering, as well as portfolios from Brookfield and Fusion.

Dynamics – Liquidity has improved, with a broader mix of capital sources including UK pension funds, institutional investors, and international capital. However, transaction timelines remain extended due to due diligence challenges, particularly those linked to the Building Safety Act, fire compartmentation, and cladding concerns. The proposed Renters Reform Act also poses a potential headwind for student accommodation. Nevertheless, key transactions continue to progress, including Rose Thorne and Barings' £101 million acquisition of Spring Mews in Vauxhall and M&G's £135 million forward funding deal with HG in Stratford.

Outlook– The outlook for the PBSA sector is more optimistic than last year, underpinned by a stronger occupational market and more realistic rental growth assumptions. Increased stock availability and diverse capital sources continue to support momentum.

BAROMETER DEAL

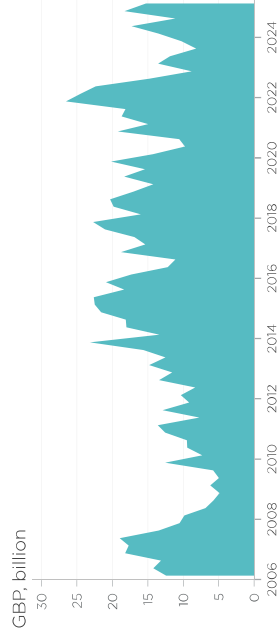


Project Wallace, Edinburgh & Glasgow
Yield – P&C
Price - £55.4 million
Status – Sold
Comments – Two-asset PBSA portfolio in Edinburgh (356 beds) and Glasgow (400 beds) in prime university locations.

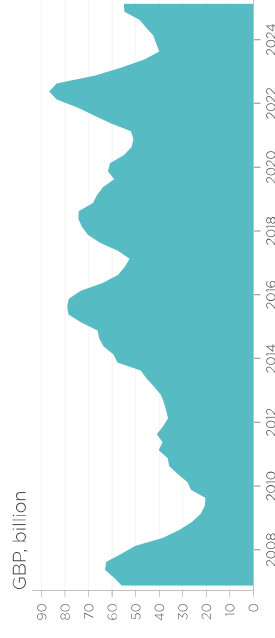
MARKET STATISTICS

Source: MSCI, Chatham Financial, Bank of England, Macrobond, Cushman & Wakefield

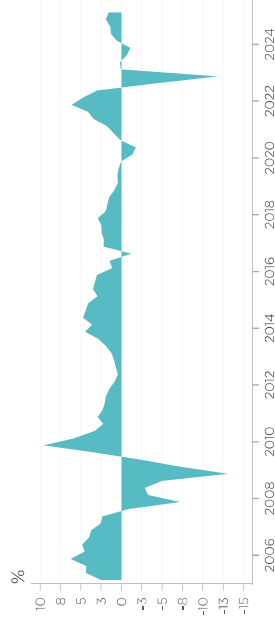
QUARTERLY INVESTMENT VOLUMES (BILLIONS)



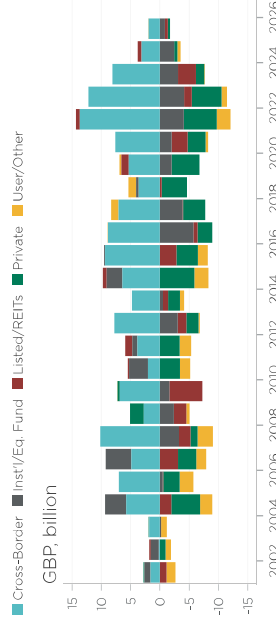
ROLLING ANNUAL INVESTMENT VOLUME (BILLIONS)



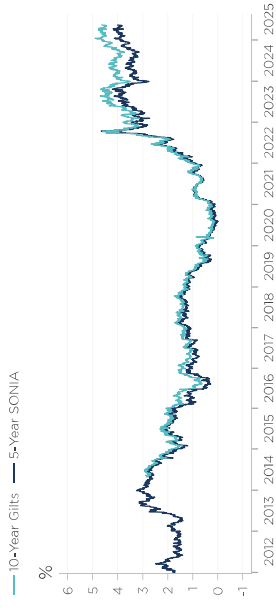
TOTAL RETURNS (%)



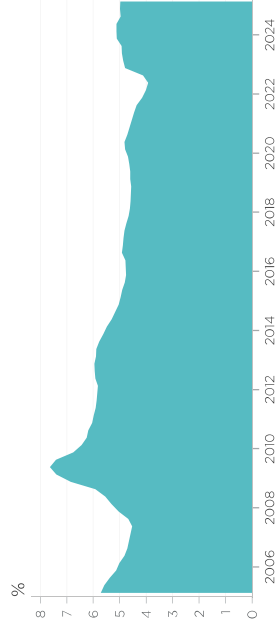
SOURCES OF CAPITAL



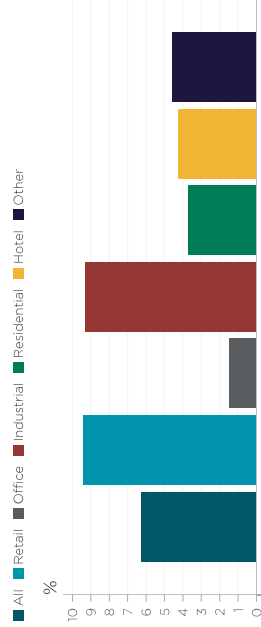
10 YEAR GILTS, 5 YEAR SONIA



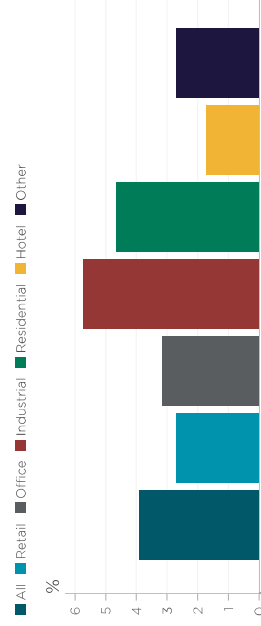
NET INITIAL YIELDS



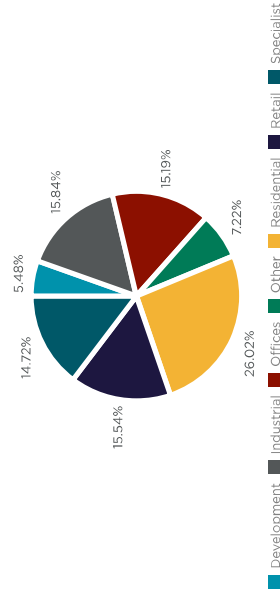
ANNUAL TOTAL RETURN BY SECTOR



ANNUAL AVERAGE RENTAL GROWTH BY SECTOR



ANNUAL INVESTMENT VOLUMES BY SECTOR



YIELD SCHEDULE

Sector	Sector	Previous Year	Previous Quarter	Previous month	Present	Annual Change (bps)	Quarterly Change (bps)	Monthly Change (bps)	Outlook
		May 24	Q1 25	Apr 25	May 25		Q-to-Q		
Town Centre Retail									
	Prime Retail Centres	7.00%	6.75%	6.75%	6.75%	-25 bps	0 bps	0 bps	Inwards
	Secondary Retail Centres	10.50%	10.00%	10.00%	10.00%	-50 bps	0 bps	0 bps	Inwards
	Prime London - West End	3.00%	3.00%	3.00%	3.00%	0 bps	0 bps	0 bps	Stable
Shopping Centres									
	Regional	8.00%	7.75%	7.75%	7.75%	-25 bps	0 bps	0 bps	Inwards
	Sub-Regional	11.00%	11.00%	11.00%	11.00%	0 bps	0 bps	0 bps	Inwards
	Local	12.00%	12.00%	12.00%	12.00%	0 bps	0 bps	0 bps	Inwards
Retail Warehouses (Greater London and SE in brackets)									
	Prime Open A1 Retail Park	5.75%	5.25%	5.25%	5.25%	-50 bps	0 bps	0 bps	Inwards
	Prime Bulky Park	6.25%	5.75%	5.75%	5.75%	-50 bps	0 bps	0 bps	Inwards
	Prime Supermarkets (RPI linked)	5.00%	4.75%	4.75%	4.75%	-25 bps	-10 bps	0 bps	Inwards
	Prime Solus (Bulky)	6.50%	5.75%	5.75%	5.75%	-75 bps	-25 bps	0 bps	Inwards
	Prime Leisure Parks	8.75%	8.25%	8.25%	8.25%	-50 bps	0 bps	0 bps	Inwards
Multi-Let Industrial									
	Prime Greater London	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Inwards
	Prime South East	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Inwards
	Prime Regional	5.25%	5.25%	5.25%	5.25%	0 bps	0 bps	0 bps	Inwards
Distribution Warehousing									
	Prime Long Income	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Inwards
	Prime Medium Income	5.50%	5.50%	5.50%	5.50%	0 bps	0 bps	0 bps	Inwards
	Prime Short Income	6.00%	5.75%	5.75%	5.75%	-25 bps	0 bps	0 bps	Inwards
In Town Offices									
	Greater London	7.00%	6.75%	6.75%	6.75%	-25 bps	0 bps	0 bps	Stable
	Prime City Offices	5.75%	5.75%	5.75%	5.75%	0 bps	0 bps	0 bps	Stable
	Prime West End Offices	4.00%	4.00%	4.00%	4.00%	0 bps	0 bps	0 bps	Stable
	Prime M25	7.25%	7.00%	7.00%	7.00%	-25 bps	0 bps	0 bps	Stable
	Prime Regional	7.00%	6.50%	6.50%	6.50%	-50 bps	-25 bps	0 bps	Stable
Out of Town Offices									
	Prime South East	8.25%	8.00%	8.00%	8.00%	-25 bps	0 bps	0 bps	Stable
	Prime Regional	9.25%	9.00%	9.00%	9.00%	-25 bps	-25 bps	0 bps	Stable

Sector	Sector	Previous Year	Previous Quarter	Previous month	Present	Annual Change (bps)	Quarterly Change (bps)	Monthly Change (bps)	Outlook
		May 24	Q1 25	Apr 25	May 25		Q-to-Q		
Co-living									
	Greater London	4.75%	4.50%	4.50%	4.50%	-25 bps	0 bps	0 bps	Stable
	Prime Regional	5.75%	5.00%	5.00%	5.00%	-75 bps	-25 bps	0 bps	Stable
Build to Rent									
	Prime London - West End	3.75%	4.00%	4.00%	4.00%	0 bps	0 bps	0 bps	Stable
	Greater London	4.25%	4.50%	4.50%	4.50%	0 bps	0 bps	0 bps	Stable
	Prime Regional	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Stable
Hotels									
	Prime London Fixed Income	4.75%	4.25%	4.25%	4.25%	-50 bps	0 bps	0 bps	Stable
	Prime Regional Fixed Income	5.50%	5.00%	5.00%	5.00%	-50 bps	0 bps	0 bps	Stable
	Prime London Trading	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Stable
	Prime Regional Trading	8.00%	8.00%	8.00%	8.00%	0 bps	0 bps	0 bps	Stable
Life Sciences									
	Golden Triangle	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Inwards
	Regional Centres	6.25%	6.25%	6.25%	6.25%	0 bps	0 bps	0 bps	Stable
Care Homes									
	Prime	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Stable
	Prime SPV	5.75%	5.75%	5.75%	5.75%	0 bps	0 bps	0 bps	Stable
Medical									
	Prime	4.50%	4.50%	4.50%	4.50%	0 bps	0 bps	0 bps	Stable
	Secondary	5.75%	5.75%	5.75%	5.75%	0 bps	0 bps	0 bps	Stable
Student Accommodation									
	Prime London	4.00%	4.00%	4.00%	4.00%	0 bps	0 bps	0 bps	Stable
	Greater London	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Stable
	Prime Regional	5.25%	5.25%	5.25%	5.25%	0 bps	0 bps	0 bps	Stable
Self Storage									
	Primary	5.00%	4.75%	4.75%	4.75%	-25 bps	0 bps	0 bps	Stable
	Secondary	6.00%	6.00%	6.00%	6.00%	0 bps	0 bps	0 bps	Stable
	Tertiary	7.00%	7.00%	7.00%	7.00%	0 bps	0 bps	0 bps	Stable



MARKETBEAT INVESTMENT MAY 2025

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Head of UK Capital Markets

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Prime Yield Guide – June 2025

Knight Frank Intelligence

This yield guide is for indicative purposes only
and was prepared on 23rd June 2025.



Yields are reflective of an optimum sized income-focussed transactions of prime, stabilised institutional-grade assets. Yields are provided on a Net Initial Yield (NIY) basis assuming a rack rented property.

SECTOR	JUN-24	JAN-25	FEB-25	MAR-25	APR-25	MAY-25	JUN-25	1 MONTH CHANGE	MARKET SENTIMENT
 Student Property	Prime London - Direct Let	4.25%	4.25%	4.25%	4.25%	4.25%	4.25%		STABLE
	Prime Regional - Direct Let	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Prime London - 25 yr lease, Annual RPI	4.25% +	4.25%	4.00%	4.00%	4.00%	4.00%		STABLE
	Prime Regional - 25 yr lease, Annual RPI	4.50% +	4.50%	4.25%	4.25%	4.25%	4.25%		STABLE
 Co-Living	Prime London	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +		STABLE
	Prime Regional	5.00% +	5.00% +	5.00% +	5.00% +	5.00% +	5.00% +		STABLE
 Build to Rent	Zone 1 London Prime	3.90% +	3.90% +	3.90% +	3.90% +	3.90% +	3.90% +		STABLE
	Zone 2 London Prime	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +		STABLE
	Zones 3-4 London Prime	4.15% +	4.15% +	4.15% +	4.15% +	4.15% +	4.15% +		STABLE
	Greater London Prime	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +		STABLE
	South East Prime	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +		STABLE
	Tier 1 Regional Cities	4.50% +	4.50%	4.50%	4.50%	4.50%	4.50%		STABLE
	Tier 2 Regional Cities	4.75% +	4.75% +	4.75% +	4.75% +	4.75% +	4.75% +		STABLE
	South East – Single Family Housing	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +		POSITIVE
 Seniors Housing	Regional – Single Family Housing	4.50% +	4.50% +	4.50% +	4.50% +	4.50% +	4.50% +		POSITIVE
	Prime South East	5.25% +	5.25% +	5.25% +	5.25% +	5.25% +	5.25% +		STABLE

Your partners in property.

Prime Yield Guide – June 2025

Knight Frank Intelligence

This yield guide is for indicative purposes only
and was prepared on 23rd June 2025.



KEY RESEARCH



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- IPOs

KEY CONTACTS VALUATIONS / RESEARCH

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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Enclosure 4: RICS BCIS – Rebased to York - Q3 2025

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 26-Jul-2025 07:30

Rebased to 3Q 2025 (403; forecast) and York (96; sample 20)

MAXIMUM AGE OF RESULTS: 5 YEARS

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810.1 Estate housing							
Generally (5)	1,667	774	1,380	1,643	1,843	3,346	183
Single storey (5)	1,947	1,288	1,642	1,815	2,115	3,346	31
2-storey (5)	1,615	774	1,360	1,628	1,804	2,568	148
3-storey (5)	1,446	1,116	-	1,443	-	1,782	4
810.12 Estate housing semi detached							
Generally (5)	1,773	1,063	1,535	1,696	1,899	3,346	51
Single storey (5)	1,899	1,288	1,650	1,833	1,884	3,346	17
2-storey (5)	1,709	1,063	1,338	1,660	1,909	2,568	33
3-storey (5)	1,782	-	-	-	-	-	1
810.13 Estate housing terraced							
Generally (5)	1,496	891	1,315	1,381	1,724	2,076	11
2-storey (5)	1,534	891	1,346	1,455	1,760	2,076	10
3-storey (5)	1,116	-	-	-	-	-	1
816. Flats (apartments)							
Generally (5)	1,939	1,023	1,541	1,855	2,229	3,674	139

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
1-2 storey (5)	1,929	1,023	1,539	1,890	2,298	3,399	29	
3-5 storey (5)	1,919	1,031	1,541	1,820	2,146	3,674	100	
6 storey or above (5)	2,167	1,448	1,845	2,304	2,475	2,899	10	
856.2 Students' residences, halls of residence, etc (5)	1,787	1,743	-	-	-	1,830	2	
Rehabilitation/Conversion								
816. Flats (apartments)								
Generally (5)	2,014	393	1,149	1,205	2,477	4,843	5	
1-2 storey (5)	1,205	-	-	-	-	-	1	
3-5 storey (5)	2,216	393	-	1,813	-	4,843	4	

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 09-Aug-2025 07:26

Rebased to York (96; sample 20)

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								
856.2 Students' residences, halls of residence, etc (15)	2,191	1,279	1,870	2,219	2,417	3,648	45	

Enclosure 5: Developer-led PBSA Development Typology Appraisals

York CIL Representations
PBSA: 100 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

York CIL Representations
PBSA: 100 unit Typology
Appraisal

Appraisal Summary for Phase 13 100 (V4 - Aug 25)

Currency in £

REVENUE

Rental Area Summary

	Units	ft ²	Rent Rate ft ²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	21,528	53.70	11,560	809,200	1,156,000	809,200

Investment Valuation

Student accommodation - 100 bed typology

Current Rent	809,200	YP @	5.5000%	18.1818	14,712,727
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NET REALISATION

14,712,727

OUTLAY

ACQUISITION COSTS

Residualised Price			126,966	
				126,966
Agent Fee		1.00%	1,270	
Legal Fee		0.80%	1,016	
				2,285

CONSTRUCTION COSTS

Construction

	ft ²	Build Rate ft ²	Cost	
Student accommodation - 100 bed typology	35,880	224.55	8,056,854	
Externals		10.00%	805,685	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		5.00%	443,127	
				9,373,666

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	
Building Safety Levy	35,880 ft ²	1.47	52,744	
				980,294

PROFESSIONAL FEES

Professional Fees		8.00%	709,003	
				709,003

DISPOSAL FEES

Sales Agent Fee		2.00%	294,255	
				294,255

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)				
Land			20,492	
Construction			753,646	
Total Finance Cost				774,137

TOTAL COSTS

12,260,607

PROFIT

2,452,120

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%

IRR% (without Interest)	29.68%
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Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

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York CIL Representations PBSA: 100 unit Typology Appraisal

Detailed Cash flow Phase 13 (100 (V4 - Aug 25))

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Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	(189,055)	(252,085)	(317,148)	(695,796)	(954,350)	(1,308,953)	(1,749,676)	(2,266,364)	(2,848,870)
Revenue										
Cap - Student accommodation - 100 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	(126,966)	0	0	0	0	0	0	0	0	0
Agent Fee	(1,270)	0	0	0	0	0	0	0	0	0
Legal Fee	(1,016)	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 100 bed typology	0	0	0	(67,858)	(151,637)	(227,174)	(294,469)	(353,522)	(404,333)	(446,902)
Policy H10 AH OSFC Payment	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)
Policy CC1, CC2 & CC3	0	0	0	(225,000)	0	0	0	0	0	0
Policy G12 BNG	0	0	0	(2,550)	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	0	0	0	(6,786)	(15,164)	(22,717)	(29,447)	(35,352)	(40,433)	(44,690)
Site Abnormals	(1,470)	(3,476)	(5,109)	(6,369)	(7,256)	(7,771)	(7,912)	(7,681)	(7,077)	(6,100)
Contingency	0	0	0	(3,732)	(8,340)	(12,495)	(16,196)	(19,444)	(22,238)	(24,580)
Professional Fees										
Professional Fees	0	0	0	(5,972)	(13,344)	(19,991)	(25,913)	(31,110)	(35,581)	(39,327)
Net Cash Flow Before Finance	(189,055)	(61,809)	(63,442)	(376,600)	(254,074)	(348,481)	(432,270)	(505,442)	(567,997)	(619,933)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(1,221)	(1,620)	(2,048)	(4,480)	(6,121)	(8,454)	(11,245)	(14,510)	(18,399)
Net Cash Flow After Finance	(189,055)	(63,030)	(65,062)	(378,648)	(258,555)	(354,602)	(440,724)	(516,688)	(582,506)	(638,332)
Cumulative Net Cash Flow Monthly	(189,055)	(252,085)	(317,148)	(695,796)	(954,350)	(1,308,953)	(1,749,676)	(2,266,364)	(2,848,870)	(3,487,203)

DETAILED CASH FLOW

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York CIL Representations PBSA: 100 unit Typology Appraisal

Detailed Cash flow Phase 13 (100 (V4 - Aug 25))

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Monthly B/F	011-Jun 2026 (3,487,203)	012-Jul 2026 (4,170,858)	013-Aug 2026 (4,889,486)	014-Sep 2026 (5,573,837)	015-Oct 2026 (6,274,339)	016-Nov 2026 (6,980,823)	017-Dec 2026 (7,683,752)	018-Jan 2027 (8,372,130)	019-Feb 2027 (9,035,591)	020-Mar 2027 (9,664,659)
Revenue										
Cap - Student accommodation - 100 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Agent Fee	0	0	0	0	0	0	0	0	0	0
Legal Fee	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 100 bed typology	(481,230)	(507,315)	(525,159)	(534,761)	(536,121)	(529,239)	(514,115)	(490,749)	(459,142)	(419,292)
Policy H10 AH OSFC Payment	(58,333)	(58,333)	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	(48,123)	(50,732)	(52,516)	(53,476)	(53,612)	(52,924)	(51,412)	(49,075)	(45,914)	(41,929)
Site Abnormals	(4,751)	(3,028)	0	0	0	0	0	0	0	0
Contingency	(26,468)	(27,902)	(28,884)	(29,412)	(29,487)	(29,108)	(28,276)	(26,991)	(25,253)	(23,061)
Professional Fees										
Professional Fees	(42,348)	(44,644)	(46,214)	(47,059)	(47,179)	(46,573)	(45,242)	(43,186)	(40,404)	(36,898)
Net Cash Flow Before Finance	(661,253)	(691,955)	(652,773)	(664,708)	(666,398)	(657,844)	(639,045)	(610,001)	(570,713)	(521,180)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(22,403)	(26,673)	(31,578)	(35,794)	(40,087)	(45,084)	(49,333)	(53,460)	(58,355)	(62,041)
Net Cash Flow After Finance	(683,656)	(718,628)	(684,351)	(700,502)	(706,485)	(702,928)	(688,378)	(663,462)	(629,068)	(583,221)
Cumulative Net Cash Flow Monthly	(4,170,858)	(4,889,486)	(5,573,837)	(6,274,339)	(6,980,823)	(7,683,752)	(8,372,130)	(9,035,591)	(9,664,659)	(10,247,880)

DETAILED CASH FLOW

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York CIL Representations PBSA: 100 unit Typology Appraisal

Detailed Cash flow Phase 13 (100 (V4 - Aug 25))

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Monthly B/F	021-Apr 2027 (10,247,880)	022-May 2027 (10,774,689)	023-Jun 2027 (11,235,656)	024-Jul 2027 (11,618,884)	025-Aug 2027 (11,966,352)	026-Sep 2027 2,452,120	027-Oct 2027 2,452,120	028-Nov 2027 2,452,120	029-Dec 2027 2,452,120	030-Jan 2028 2,452,120
Revenue										
Cap - Student accommodation - 100 bed typology	0	0	0	0	0	14,712,727	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	(294,255)	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Agent Fee	0	0	0	0	0	0	0	0	0	0
Legal Fee	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 100 bed typology	(371,201)	(314,867)	(250,292)	(177,475)	0	0	0	0	0	0
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	(52,744)	0	0	0	0	0	0
Externals	(37,120)	(31,487)	(25,029)	(17,748)	0	0	0	0	0	0
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(20,416)	(17,318)	(13,766)	(9,761)	0	0	0	0	0	0
Professional Fees										
Professional Fees	(32,666)	(27,708)	(22,026)	(15,618)	0	0	0	0	0	0
Net Cash Flow Before Finance	(461,403)	(391,380)	(311,113)	(273,345)	14,418,473	0	0	0	0	0
Debit Rate 7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(65,407)	(69,587)	(72,114)	(74,123)	0	0	0	0	0	0
Net Cash Flow After Finance	(526,809)	(460,967)	(383,228)	(347,469)	14,418,473	0	0	0	0	0
Cumulative Net Cash Flow Monthly	(10,774,689)	(11,235,656)	(11,618,884)	(11,966,352)	2,452,120	2,452,120	2,452,120	2,452,120	2,452,120	2,452,120

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York CIL Representations
PBSA: 200 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

York CIL Representations
PBSA: 200 unit Typology
Appraisal

Appraisal Summary for Phase 14 200 (V4 - Aug 25)

Currency in £

REVENUE

Rental Area Summary

	Units	ft ²	Rent Rate ft ²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	43,056	53.70	11,560	1,618,400	2,312,000	1,618,400

Investment Valuation

Student accommodation - 200 bed typology

Current Rent	1,618,400	YP @	5.5000%	18.1818	29,425,455
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NET REALISATION

29,425,455

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(127,008)
	(127,008)

CONSTRUCTION COSTS

Construction

	ft ²	Build Rate ft ²	Cost
Student accommodation - 200 bed typology	71,760	224.55	16,113,708
Externals		10.00%	1,611,371
Site Abnormals	0 ac	400,000 /ac	184,000
Contingency		5.00%	886,254
			2,681,625

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
Building Safety Levy	71,760 ft ²	1.47	105,487
			1,962,387

PROFESSIONAL FEES

Professional Fees	8.00%	1,418,006
		1,418,006

DISPOSAL FEES

Sales Agent Fee	2.00%	588,509
		588,509

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)	
Land	(24,742)
Construction	1,908,727
Total Finance Cost	1,883,985

TOTAL COSTS

24,521,213

PROFIT

4,904,242

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%
IRR% (without Interest)	25.69%
Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

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York CIL Representations PBSA: 200 unit Typology Appraisal

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

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Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	23,954	(83,193)	(194,335)	(885,364)	(1,264,577)	(1,775,400)	(2,407,333)	(3,149,609)	(3,991,481)
Revenue										
Cap - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	127,008	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	0
Policy H10 AH OSFC Payment	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	0	0	0	0	0	0	0	0	0	0
Site Abnormals	(3,054)	(7,147)	(10,605)	(13,428)	(20,747)	(31,016)	(40,417)	(48,949)	(56,613)	(63,407)
Contingency	0	0	0	0	0	0	0	0	0	0
Professional Fees										
Professional Fees	0	0	0	0	0	0	0	0	0	0
Net Cash Flow Before Finance	23,954	(107,147)	(110,605)	(689,774)	(373,503)	(502,701)	(620,467)	(726,802)	(821,706)	(905,178)
Debit Rate 7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	0	(537)	(1,255)	(5,710)	(8,122)	(11,466)	(15,473)	(20,167)	(25,778)
Net Cash Flow After Finance	23,954	(107,147)	(111,142)	(691,029)	(379,213)	(510,823)	(631,933)	(742,275)	(841,873)	(930,956)
Cumulative Net Cash Flow Monthly	23,954	(83,193)	(194,335)	(885,364)	(1,264,577)	(1,775,400)	(2,407,333)	(3,149,609)	(3,991,481)	(4,922,438)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 200 unit Typology Appraisal

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

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Monthly B/F	011-Jun 2026 (4,922,438)	012-Jul 2026 (5,931,281)	013-Aug 2026 (7,007,045)	014-Sep 2026 (8,139,306)	015-Oct 2026 (9,316,334)	016-Nov 2026 (10,424,392)	017-Dec 2026 (11,559,921)	018-Jan 2027 (12,711,237)	019-Feb 2027 (13,867,602)	020-Mar 2027 (15,019,647)
Revenue										
Cap - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 200 bed typology	(693,339)	(743,917)	(785,810)	(819,018)	(843,540)	(859,376)	(866,527)	(864,993)	(854,773)	(835,867)
Policy H10 AH OSFC Payment	(100,000)	(100,000)	(100,000)	(100,000)	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	(69,334)	(74,392)	(78,581)	(81,902)	(84,354)	(85,938)	(86,653)	(86,499)	(85,477)	(83,587)
Site Abnormals	(15,399)	(13,140)	(10,245)	(6,715)	0	0	0	0	0	0
Contingency	(38,134)	(40,915)	(43,220)	(45,046)	(46,395)	(47,266)	(47,659)	(47,575)	(47,013)	(45,973)
Professional Fees										
Professional Fees	(61,014)	(65,465)	(69,151)	(72,074)	(74,231)	(75,625)	(76,254)	(76,119)	(75,220)	(73,556)
Net Cash Flow Before Finance	(977,219)	(1,037,829)	(1,087,007)	(1,124,754)	(1,048,520)	(1,068,205)	(1,077,093)	(1,075,186)	(1,062,483)	(1,038,983)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(31,624)	(37,935)	(45,254)	(52,274)	(59,538)	(67,324)	(74,223)	(81,179)	(89,562)	(96,423)
Net Cash Flow After Finance	(1,008,843)	(1,075,764)	(1,132,261)	(1,177,028)	(1,108,058)	(1,135,529)	(1,151,316)	(1,156,365)	(1,152,044)	(1,135,407)
Cumulative Net Cash Flow Monthly	(5,931,281)	(7,007,045)	(8,139,306)	(9,316,334)	(10,424,392)	(11,559,921)	(12,711,237)	(13,867,602)	(15,019,647)	(16,155,053)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 200 unit Typology Appraisal

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

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Monthly B/F	021-Apr 2027 (16,165,053)	022-May 2027 (17,262,875)	023-Jun 2027 (18,333,960)	024-Jul 2027 (19,355,356)	025-Aug 2027 (20,315,904)	026-Sep 2027 (21,206,656)	027-Oct 2027 (22,014,037)	028-Nov 2027 (22,726,682)	029-Dec 2027 (23,335,788)	030-Jan 2028 (23,932,703)
Revenue										
Cap - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	29,425,455
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	(588,509)
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 200 bed typology	(808,277)	(772,000)	(727,038)	(673,391)	(611,058)	(540,040)	(460,336)	(371,946)	(274,872)	0
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	(105,487)	0
Externals	(80,828)	(77,200)	(72,704)	(67,339)	(61,106)	(54,004)	(46,034)	(37,195)	(27,487)	0
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(44,455)	(42,460)	(39,987)	(37,036)	(33,608)	(29,702)	(25,318)	(20,457)	(15,118)	0
Professional Fees										
Professional Fees	(71,128)	(67,936)	(63,979)	(59,258)	(53,773)	(47,523)	(40,510)	(32,731)	(24,189)	0
Net Cash Flow Before Finance	(1,004,688)	(959,596)	(903,709)	(837,025)	(759,545)	(671,269)	(572,197)	(462,329)	(447,153)	28,836,945
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(103,134)	(111,489)	(117,687)	(123,523)	(131,207)	(136,112)	(140,448)	(146,776)	(149,762)	0
Net Cash Flow After Finance	(1,107,821)	(1,071,086)	(1,021,395)	(960,548)	(890,752)	(807,382)	(712,645)	(609,106)	(596,915)	28,836,945
Cumulative Net Cash Flow Monthly	(17,262,875)	(18,333,960)	(19,355,356)	(20,315,904)	(21,206,656)	(22,014,037)	(22,726,682)	(23,335,788)	(23,932,703)	4,904,242

DETAILED CASH FLOW	CBRE
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**York CIL Representations
PBSA: 200 unit Typology
Appraisal**

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

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York CIL Representations
PBSA: 350 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Appraisal Summary for Phase 15 350 (V4 Aug - 25)

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	75,347	53.70	11,560	2,832,200	4,046,000	2,832,200

Investment Valuation

Student accommodation - 350 bed typology

Current Rent	2,832,200	YP @	5.5000%	18.1818	51,494,545
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NET REALISATION

51,494,545

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(672,861)
	(672,861)

CONSTRUCTION COSTS

Construction

	ft²	Build Rate ft²	Cost
Student accommodation - 350 bed typology	125,578	224.55	28,198,615
Externals		10.00%	2,819,861
Site Abnormals	1 ac	400,000 /ac	304,000
Contingency		5.00%	1,550,924
			4,674,785

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
Building Safety Levy	125,578 ft²	1.47	184,600
			3,433,500

PROFESSIONAL FEES

Professional Fees	8.00%	2,481,478
		2,481,478

DISPOSAL FEES

Sales Agent Fee	2.00%	1,029,891
		1,029,891

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)	
Land	(144,641)
Construction	3,911,366
Total Finance Cost	3,766,725

TOTAL COSTS

42,912,134

PROFIT

8,582,412

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%
IRR% (without Interest)	23.42%
Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

Page A 1

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	515,712	353,286	186,284	(951,115)	(1,483,758)	(2,194,735)	(3,072,211)	(4,104,063)	(5,278,187)
Revenue										
Cap - Student accommodation - 350 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	672,861	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 350 bed typology	0	0	0	(134,150)	(282,069)	(420,093)	(548,224)	(666,460)	(774,802)	(873,250)
Policy H10 AH OSFC Payment	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)
Policy CC1, CC2 & CC3	0	0	0	(787,500)	0	0	0	0	0	0
Policy G12 BNG	0	0	0	(11,400)	0	0	0	0	0	0
Building Safety Levy	0	0	0	(878)	(1,847)	(2,750)	(3,589)	(4,363)	(5,072)	(5,717)
Externals	0	0	0	(13,415)	(28,207)	(42,009)	(54,822)	(66,646)	(77,480)	(87,325)
Site Abnormals	(4,023)	(9,302)	(13,877)	(17,748)	(20,917)	(23,383)	(25,145)	(26,205)	(26,561)	(26,214)
Contingency	0	0	0	(7,378)	(15,514)	(23,105)	(30,152)	(36,655)	(42,614)	(48,029)
Professional Fees										
Professional Fees	0	0	0	(11,805)	(24,822)	(36,968)	(48,244)	(58,649)	(68,183)	(76,846)
Net Cash Flow Before Finance	515,712	(162,427)	(167,002)	(1,137,400)	(526,500)	(701,434)	(863,302)	(1,012,103)	(1,147,837)	(1,270,506)
Debit Rate 7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	0	0	0	(6,143)	(9,543)	(14,174)	(19,750)	(26,286)	(34,088)
Net Cash Flow After Finance	515,712	(162,427)	(167,002)	(1,137,400)	(532,643)	(710,977)	(877,476)	(1,031,853)	(1,174,124)	(1,304,594)
Cumulative Net Cash Flow Monthly	515,712	353,286	186,284	(951,115)	(1,483,758)	(2,194,735)	(3,072,211)	(4,104,063)	(5,278,187)	(6,582,781)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

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Monthly B/F	011-Jun 2026 (6,582,781)	012-Jul 2026 (8,005,182)	013-Aug 2026 (9,533,031)	014-Sep 2026 (11,154,710)	015-Oct 2026 (12,856,867)	016-Nov 2026 (14,626,891)	017-Dec 2026 (16,453,476)	018-Jan 2027 (18,165,227)	019-Feb 2027 (19,911,459)	020-Mar 2027 (21,682,006)
Revenue										
Cap - Student accommodation - 350 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 350 bed typology	(961,804)	(1,040,463)	(1,109,228)	(1,168,099)	(1,217,075)	(1,256,158)	(1,285,346)	(1,304,639)	(1,314,039)	(1,313,544)
Policy H10 AH OSFC Payment	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(6,296)	(6,811)	(7,261)	(7,647)	(7,967)	(8,223)	(8,414)	(8,541)	(8,602)	(8,599)
Externals	(96,180)	(104,046)	(110,923)	(116,810)	(121,708)	(125,616)	(128,535)	(130,464)	(131,404)	(131,354)
Site Abnormals	(25,164)	(23,411)	(20,955)	(17,795)	(13,933)	(9,367)	0	0	0	0
Contingency	(52,899)	(57,225)	(61,008)	(64,245)	(66,939)	(69,089)	(70,694)	(71,755)	(72,272)	(72,245)
Professional Fees										
Professional Fees	(84,639)	(91,561)	(97,612)	(102,793)	(107,103)	(110,542)	(113,110)	(114,808)	(115,635)	(115,592)
Net Cash Flow Before Finance	(1,380,107)	(1,476,643)	(1,560,112)	(1,630,514)	(1,687,850)	(1,732,119)	(1,806,099)	(1,830,208)	(1,841,953)	(1,841,335)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(42,294)	(51,207)	(61,567)	(71,643)	(82,174)	(94,465)	(105,652)	(116,025)	(128,595)	(139,199)
Net Cash Flow After Finance	(1,422,401)	(1,527,849)	(1,621,679)	(1,702,157)	(1,770,024)	(1,826,585)	(1,711,751)	(1,746,232)	(1,770,548)	(1,780,534)
Cumulative Net Cash Flow Monthly	(8,005,182)	(9,533,031)	(11,154,710)	(12,856,867)	(14,626,891)	(16,453,476)	(18,165,227)	(19,911,459)	(21,682,006)	(23,462,540)

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

Monthly B/F	021-Apr 2027 (23,462,540)	022-May 2027 (25,240,692)	023-Jun 2027 (27,006,713)	024-Jul 2027 (28,745,379)	025-Aug 2027 (30,444,083)	026-Sep 2027 (32,093,494)	027-Oct 2027 (33,677,491)	028-Nov 2027 (35,183,225)	029-Dec 2027 (36,601,760)	030-Jan 2028 (37,916,100)
Revenue										
Cap - Student accommodation - 350 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 350 bed typology	(1,303,155)	(1,282,872)	(1,252,695)	(1,212,623)	(1,162,657)	(1,102,797)	(1,033,042)	(953,394)	(863,851)	(764,413)
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(8,531)	(8,398)	(8,201)	(7,938)	(7,611)	(7,219)	(6,763)	(6,241)	(5,655)	(5,004)
Externals	(130,316)	(128,287)	(125,269)	(121,262)	(116,266)	(110,280)	(103,304)	(95,339)	(86,385)	(76,441)
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(71,674)	(70,558)	(68,898)	(66,694)	(63,946)	(60,654)	(56,817)	(52,437)	(47,512)	(42,043)
Professional Fees										
Professional Fees	(114,678)	(112,893)	(110,237)	(106,711)	(102,314)	(97,046)	(90,908)	(83,899)	(76,019)	(67,268)
Net Cash Flow Before Finance	(1,628,353)	(1,603,008)	(1,565,300)	(1,515,229)	(1,452,794)	(1,377,996)	(1,290,834)	(1,191,309)	(1,079,421)	(955,170)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(149,799)	(163,013)	(173,366)	(183,475)	(196,618)	(206,001)	(214,900)	(227,225)	(234,919)	(241,890)
Net Cash Flow After Finance	(1,778,152)	(1,766,021)	(1,738,666)	(1,698,703)	(1,649,412)	(1,583,996)	(1,505,734)	(1,418,534)	(1,314,340)	(1,197,060)
Cumulative Net Cash Flow Monthly	(25,240,692)	(27,006,713)	(28,745,379)	(30,444,083)	(32,093,494)	(33,677,491)	(35,183,225)	(36,601,760)	(37,916,100)	(39,113,160)

CBRE

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

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York CIL Representations
PBSA: 350 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Appraisal Summary for Phase 16 600 (V4 - Aug 25)

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	129,167	53.70	11,560	4,855,200	6,936,000	4,855,200

Investment Valuation

Student accommodation - 600 bed typology

Current Rent	4,855,200	YP @	5.5000%	18.1818	88,276,364
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NET REALISATION

88,276,364

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(2,404,462)
	(2,404,462)

CONSTRUCTION COSTS

Construction

	ft²	Build Rate ft²	Cost
Student accommodation - 600 bed typology	215,278	224.55	48,340,750
Externals		10.00%	4,834,075
Site Abnormals	2 ac	400,000 /ac	652,000
Contingency		5.00%	2,658,741
			8,144,816

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
Building Safety Levy	215,278 ft²	1.47	316,459
			5,890,909

PROFESSIONAL FEES

Professional Fees	8.00%	4,253,986
		4,253,986

DISPOSAL FEES

Sales Agent Fee	2.00%	1,765,527
		1,765,527

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)	
Land	(614,119)
Construction	8,186,228
Total Finance Cost	7,572,109

TOTAL COSTS

73,563,635

PROFIT

14,712,728

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%
IRR% (without Interest)	21.12%
Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

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Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	2,188,512	1,965,125	1,735,072	(92,216)	(773,263)	(1,673,281)	(2,780,655)	(4,083,612)	(5,570,332)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	2,404,462	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	0	0	0	(173,576)	(351,634)	(519,876)	(678,303)	(826,914)	(965,709)	(1,094,688)
Policy H10 AH OSFC Payment	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)
Policy CC1, CC2 & CC3	0	0	0	(1,350,000)	0	0	0	0	0	0
Policy G12 BNG	0	0	0	(24,450)	0	0	0	0	0	0
Building Safety Levy	0	0	0	(1,136)	(2,302)	(3,403)	(4,440)	(5,413)	(6,322)	(7,166)
Externals	0	0	0	(17,358)	(35,163)	(51,988)	(67,830)	(82,691)	(96,571)	(109,469)
Site Abnormals	(5,949)	(13,387)	(20,053)	(25,947)	(31,069)	(35,418)	(38,996)	(41,801)	(43,834)	(45,095)
Contingency	0	0	0	(9,547)	(19,340)	(28,593)	(37,307)	(45,480)	(53,114)	(60,208)
Professional Fees										
Professional Fees	0	0	0	(15,275)	(30,944)	(45,749)	(59,691)	(72,768)	(84,982)	(96,333)
Net Cash Flow Before Finance	2,188,512	(223,387)	(230,053)	(1,827,288)	(680,452)	(895,028)	(1,096,567)	(1,285,068)	(1,460,532)	(1,622,959)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	0	0	0	(596)	(4,990)	(10,807)	(17,889)	(26,188)	(35,975)
Net Cash Flow After Finance	2,188,512	(223,387)	(230,053)	(1,827,288)	(681,047)	(900,018)	(1,107,373)	(1,302,957)	(1,486,720)	(1,658,934)
Cumulative Net Cash Flow Monthly	2,188,512	1,965,125	1,735,072	(92,216)	(773,263)	(1,673,281)	(2,780,655)	(4,083,612)	(5,570,332)	(7,229,267)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

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Monthly B/F	011-Jun 2026 (7,229,267)	012-Jul 2026 (9,048,072)	013-Aug 2026 (11,014,676)	014-Sep 2026 (13,117,827)	015-Oct 2026 (15,344,380)	016-Nov 2026 (17,682,008)	017-Dec 2026 (20,119,939)	018-Jan 2027 (22,644,043)	019-Feb 2027 (25,241,742)	020-Mar 2027 (27,902,880)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	(1,213,852)	(1,323,200)	(1,422,732)	(1,512,448)	(1,592,348)	(1,662,433)	(1,722,702)	(1,773,155)	(1,813,792)	(1,844,614)
Policy H10 AH OSFC Payment	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(7,946)	(8,662)	(9,314)	(9,901)	(10,424)	(10,883)	(11,278)	(11,608)	(11,874)	(12,076)
Externals	(121,385)	(132,320)	(142,273)	(151,245)	(159,235)	(166,243)	(172,270)	(177,316)	(181,379)	(184,461)
Site Abnormals	(45,584)	(45,301)	(44,246)	(42,419)	(39,819)	(36,448)	(32,304)	(27,388)	(21,700)	(15,240)
Contingency	(66,762)	(72,776)	(78,250)	(83,185)	(87,579)	(91,434)	(94,749)	(97,524)	(99,759)	(101,454)
Professional Fees										
Professional Fees	(106,819)	(116,442)	(125,200)	(133,095)	(140,127)	(146,294)	(151,598)	(156,038)	(159,614)	(162,326)
Net Cash Flow Before Finance	(1,772,349)	(1,908,701)	(2,032,015)	(2,142,293)	(2,239,532)	(2,323,735)	(2,394,900)	(2,453,028)	(2,498,118)	(2,530,171)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(46,457)	(57,903)	(71,136)	(84,260)	(98,096)	(114,196)	(129,204)	(144,671)	(163,020)	(179,153)
Net Cash Flow After Finance	(1,818,805)	(1,966,604)	(2,103,152)	(2,226,552)	(2,337,628)	(2,437,931)	(2,524,104)	(2,597,699)	(2,661,138)	(2,709,325)
Cumulative Net Cash Flow Monthly	(9,048,072)	(11,014,676)	(13,117,827)	(15,344,380)	(17,682,008)	(20,119,939)	(22,644,043)	(25,241,742)	(27,902,880)	(30,612,204)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

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Monthly B/F	021-Apr 2027 (30,612,204)	022-May 2027 (33,138,877)	023-Jun 2027 (35,698,059)	024-Jul 2027 (38,274,105)	025-Aug 2027 (40,854,760)	026-Sep 2027 (43,432,130)	027-Oct 2027 (45,989,363)	028-Nov 2027 (48,513,967)	029-Dec 2027 (50,998,771)	030-Jan 2028 (53,425,724)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	(1,865,620)	(1,876,810)	(1,878,184)	(1,869,742)	(1,851,485)	(1,823,412)	(1,785,523)	(1,737,818)	(1,680,298)	(1,612,962)
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(12,213)	(12,286)	(12,295)	(12,240)	(12,121)	(11,937)	(11,689)	(11,376)	(11,000)	(10,559)
Externals	(186,562)	(187,681)	(187,818)	(186,974)	(185,149)	(182,341)	(178,552)	(173,782)	(168,030)	(161,296)
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(102,609)	(103,225)	(103,300)	(102,836)	(101,832)	(100,288)	(98,204)	(95,580)	(92,416)	(88,713)
Professional Fees										
Professional Fees	(164,175)	(165,159)	(165,280)	(164,537)	(162,931)	(160,460)	(157,126)	(152,928)	(147,866)	(141,941)
Net Cash Flow Before Finance	(2,331,178)	(2,345,161)	(2,346,878)	(2,336,330)	(2,313,516)	(2,278,438)	(2,231,094)	(2,171,485)	(2,099,610)	(2,015,470)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(195,494)	(214,022)	(229,168)	(244,325)	(263,854)	(278,795)	(293,510)	(313,319)	(327,344)	(340,904)
Net Cash Flow After Finance	(2,526,672)	(2,559,183)	(2,576,046)	(2,580,655)	(2,577,370)	(2,557,233)	(2,524,604)	(2,484,804)	(2,426,954)	(2,356,374)
Cumulative Net Cash Flow Monthly	(33,138,877)	(35,698,059)	(38,274,105)	(40,854,760)	(43,432,130)	(45,989,363)	(48,513,967)	(50,998,771)	(53,425,724)	(55,782,098)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

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Monthly B/F	031:Feb 2028 (55,782,098)	032:Mar 2028 (58,061,423)	033:Apr 2028 (60,244,471)	034:May 2028 (62,318,276)	035:Jun 2028 (64,277,007)	036:Jul 2028 (66,100,322)	037:Aug 2028 (67,775,018)	038:Sep 2028 (69,295,796)	039:Oct 2028 (70,641,307)	040:Nov 2028 (71,798,108)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	88,276,364
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	(1,765,527)
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	(1,535,810)	(1,448,842)	(1,352,058)	(1,245,459)	(1,129,044)	(1,002,813)	(866,766)	(720,904)	(565,225)	0
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(10,054)	(9,485)	(8,851)	(8,153)	(7,391)	(6,565)	(5,674)	(4,719)	(3,700)	0
Externals	(153,581)	(144,884)	(135,206)	(124,546)	(112,904)	(100,281)	(86,677)	(72,090)	(56,523)	0
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(84,470)	(79,686)	(74,363)	(68,500)	(62,097)	(55,155)	(47,672)	(39,650)	(31,087)	0
Professional Fees										
Professional Fees	(135,151)	(127,498)	(118,981)	(109,600)	(99,356)	(88,248)	(76,275)	(63,440)	(49,740)	0
Net Cash Flow Before Finance	(1,919,065)	(1,810,395)	(1,689,459)	(1,556,259)	(1,410,792)	(1,253,061)	(1,083,064)	(900,802)	(706,275)	86,510,836
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(360,259)	(372,653)	(384,345)	(402,472)	(412,523)	(421,634)	(437,714)	(444,708)	(450,526)	0
Net Cash Flow After Finance	(2,279,325)	(2,183,048)	(2,073,805)	(1,958,731)	(1,823,315)	(1,674,695)	(1,520,778)	(1,345,511)	(1,156,801)	86,510,836
Cumulative Net Cash Flow Monthly	(58,061,423)	(60,244,471)	(62,318,276)	(64,277,007)	(66,100,322)	(67,775,018)	(69,295,796)	(70,641,307)	(71,798,108)	14,712,728

Enclosure 6: CBRE Residential Appraisal – Typology 17

York CIL Representations

Typology 17: Urban - Large - 45 Dwellings - Brownfield

CBRE Appraisal

Development Appraisal

CBRE

15 August 2025

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Appraisal Summary for Phase 3 Typology 17 - CBRE Aug 25

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Private Units	38	36,748	371.55	359,313	13,653,888
Social Rent	4	3,384	148.63	125,738	502,950
Affordable Rent	4	3,384	185.78	157,172	628,688
Intermediate	<u>2</u>	<u>1,709</u>	260.19	222,332	<u>444,665</u>
Totals	48	45,225			15,230,191

NET REALISATION

15,230,191

OUTLAY

ACQUISITION COSTS

Residualised Price		735,131	
			735,131
Purchaser's Costs	1.75%	12,865	
			12,865

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
Build Costs: Private Units	37,995	152.48	5,793,507
Build Costs: Affordable Units	<u>9,280</u>	152.64	<u>1,416,470</u>
Totals	47,275 ft²		7,209,977
Contingency		5.00%	410,274
			7,620,251

Other Construction

16no. Garages (£15k per unit)		249,555	
Externals	10.00%	745,953	
Abnormals		378,000	
Building Safety Levy		30,197	
			1,403,705

Section 106 Costs

S106		397,152	
Policy G12a		48,000	
Policy G12: BNG		11,088	
Policy CC1, CC2 & CC3		720,000	
EV Charging Points		48,000	
Cat(3)(B)		54,480	
Cat(3)(A)		27,907	
			1,306,627

PROFESSIONAL FEES

Professional Fees	8.00%	656,439	
			656,439

DISPOSAL FEES

Private Disposal Fees		3.00%	409,617
Affordable Disposal Fees	10 un	500.00 /un	5,000
			414,617

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)			
Land		133,920	
Construction		119,870	
Other		1,566	
Total Finance Cost			255,356

TOTAL COSTS

12,404,991

PROFIT

2,825,200

Performance Measures

Profit on Cost%	22.77%
Profit on GDV%	18.55%
Profit on NDV%	18.55%

York CIL Representations**Typology 17: Urban - Large - 45 Dwellings - Brownfield****CBRE Appraisal**

IRR% (without Interest)	52.78%
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Profit Erosion (finance rate 7.750)	2 yrs 8 mths
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DETAILED CASH FLOW

CBRE

York CIL Representations Typology 17: Urban - Large - 45 Dwellings - Brownfield CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page A 1

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)
Revenue										
Sale - Intermediate	0	0	0	0	0	0	0	0	0	18,528
Sale - Affordable Rent	0	0	0	0	0	0	0	0	0	26,195
Sale - Social Rent	0	0	0	0	0	0	0	0	0	20,956
Sale - Private Units	0	0	0	0	0	0	0	0	0	568,912
Disposal Costs										
Private Disposal Fees	0	0	0	0	0	0	0	0	0	(17,067)
Affordable Disposal Fees	0	0	0	0	0	0	0	0	0	(208)
Unit Information										
Private Units										
Social Rent										
Affordable Rent										
Intermediate										
Build Costs: Private Units										
Build Costs: Affordable Units										
Acquisition Costs										
Residualised Price	(735,131)	0	0	0	0	0	0	0	0	0
Purchaser's Costs	(12,865)	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Build Costs: Private Units	0	0	0	(39,280)	(85,971)	(128,692)	(167,442)	(202,222)	(233,032)	(259,871)
Con. - Build Costs: Affordable Units	0	0	0	(9,604)	(21,019)	(31,464)	(40,938)	(49,442)	(56,975)	(63,537)
16no. Garages (£15k per unit)	0	0	0	(1,692)	(3,703)	(5,543)	(7,213)	(8,711)	(10,038)	(11,194)
Externals	0	0	0	(5,058)	(11,069)	(16,570)	(21,559)	(26,037)	(30,004)	(33,460)
Abnormals	0	0	0	(2,563)	(5,609)	(8,397)	(10,925)	(13,194)	(15,204)	(16,955)
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
S106	(6,592)	(15,426)	(22,890)	(28,983)	(33,704)	(37,054)	(39,033)	(39,641)	(38,878)	(36,744)
Policy G12a	0	0	0	(325)	(712)	(1,066)	(1,387)	(1,675)	(1,931)	(2,153)
Policy G12: BNG	0	0	0	(75)	(165)	(246)	(320)	(387)	(446)	(497)
Policy CC1, CC2 & CC3	0	0	0	(4,882)	(10,684)	(15,993)	(20,809)	(25,132)	(28,961)	(32,296)
EV Charging Points	0	0	0	(325)	(712)	(1,066)	(1,387)	(1,675)	(1,931)	(2,153)
Cat(3)(B)	0	0	0	(369)	(808)	(1,210)	(1,575)	(1,902)	(2,191)	(2,444)
Cat(3)(A)	0	0	0	(189)	(414)	(620)	(807)	(974)	(1,123)	(1,252)
Contingency	0	0	0	(2,782)	(6,088)	(9,113)	(11,858)	(14,321)	(16,502)	(18,403)
Professional Fees										
Professional Fees	0	0	0	(4,451)	(9,741)	(14,582)	(18,972)	(22,913)	(26,404)	(29,445)
Net Cash Flow Before Finance	(754,587)	(15,426)	(22,890)	(100,577)	(190,401)	(271,617)	(344,226)	(408,226)	(463,619)	106,911
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(4,873)	(4,973)	(5,184)	(5,834)	(7,064)	(8,935)	(11,158)	(13,794)	(12,909)
Net Cash Flow After Finance	(754,587)	(20,300)	(27,863)	(105,761)	(196,235)	(278,681)	(353,160)	(419,384)	(477,413)	94,002

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25) Page B 1

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)
Cumulative Net Cash Flow Monthly	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)	(2,539,383)

**York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal**

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

011:Jun 2026 (2,539,383)	012:Jul 2026 (2,482,867)	013:Aug 2026 (2,455,477)	014:Sep 2026 (2,449,035)	015:Oct 2026 (2,454,828)	016:Nov 2026 (2,461,149)	017:Dec 2026 (2,473,162)	018:Jan 2027 (2,483,439)	019:Feb 2027 (2,484,734)	020:Mar 2027 (2,469,978)	021:Apr 2027 (2,431,604)	022:May 2027 (2,362,223)
18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528
26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195
20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956
568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912
(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)
(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)
0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0
(282,741)	(301,639)	(316,568)	(327,526)	(334,514)	(337,531)	(336,578)	(331,655)	(322,761)	(309,898)	(293,063)	(272,259)
(69,128)	(73,749)	(77,398)	(80,078)	(81,786)	(82,524)	(82,291)	(81,087)	(78,913)	(75,768)	(71,652)	(66,565)
(12,179)	(12,993)	(13,636)	(14,108)	(14,409)	(14,539)	(14,498)	(14,286)	(13,903)	(13,349)	(12,624)	(11,728)
(36,405)	(38,838)	(40,760)	(42,171)	(43,071)	(43,459)	(43,337)	(42,703)	(41,558)	(39,901)	(37,734)	(35,055)
(18,448)	(19,661)	(20,655)	(21,370)	(21,825)	(22,022)	(21,960)	(21,639)	(21,059)	(20,219)	(19,121)	(17,764)
0	0	0	0	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)
(33,238)	(28,361)	(22,113)	(14,494)	0	0	0	0	0	0	0	0
(2,343)	(2,499)	(2,623)	(2,714)	(2,771)	(2,796)	(2,789)	(2,748)	(2,674)	(2,568)	(2,428)	(2,256)
(541)	(577)	(606)	(627)	(640)	(646)	(644)	(635)	(618)	(593)	(561)	(521)
(35,138)	(37,487)	(39,342)	(40,704)	(41,572)	(41,947)	(41,829)	(41,217)	(40,112)	(38,513)	(36,421)	(33,836)
(2,343)	(2,499)	(2,623)	(2,714)	(2,771)	(2,796)	(2,789)	(2,748)	(2,674)	(2,568)	(2,428)	(2,256)
(2,659)	(2,837)	(2,977)	(3,080)	(3,146)	(3,174)	(3,165)	(3,119)	(3,035)	(2,914)	(2,756)	(2,560)
(1,362)	(1,453)	(1,525)	(1,578)	(1,611)	(1,626)	(1,621)	(1,598)	(1,555)	(1,493)	(1,412)	(1,311)
(20,023)	(21,361)	(22,418)	(23,194)	(23,689)	(23,903)	(23,835)	(23,487)	(22,857)	(21,946)	(20,754)	(19,280)
(32,036)	(34,178)	(35,869)	(37,111)	(37,902)	(38,244)	(38,136)	(37,578)	(36,571)	(35,113)	(33,206)	(30,849)

68,734	39,164	18,203	5,849	5,284	(216)	1,521	10,494	26,704	50,151	80,834	118,754
7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(12,218)	(11,775)	(11,760)	(11,642)	(11,605)	(11,797)	(11,798)	(11,788)	(11,949)	(11,776)	(11,452)	(11,158)
56,516	27,390	6,443	(5,794)	(6,321)	(12,013)	(10,277)	(1,294)	14,755	38,374	69,381	107,596

DETAILED CASH FLOW

CBRE

York CIL Representations

Typology 17: Urban - Large - 45 Dwellings - Brownfield

CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page B 2

	011:Jun 2026	012:Jul 2026	013:Aug 2026	014:Sep 2026	015:Oct 2026	016:Nov 2026	017:Dec 2026	018:Jan 2027	019:Feb 2027	020:Mar 2027	021:Apr 2027	022:May 2027
	(2,539,383)	(2,482,867)	(2,455,477)	(2,449,035)	(2,454,828)	(2,461,149)	(2,473,162)	(2,483,439)	(2,484,734)	(2,469,978)	(2,431,604)	(2,362,223)
	(2,482,867)	(2,455,477)	(2,449,035)	(2,454,828)	(2,461,149)	(2,473,162)	(2,483,439)	(2,484,734)	(2,469,978)	(2,431,604)	(2,362,223)	(2,254,627)

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

023:Jun 2027	(2,254,627)	024:Jul 2027	(2,101,107)	025:Aug 2027	(1,894,136)	026:Sep 2027	(1,626,338)	027:Oct 2027	(1,289,891)	028:Nov 2027	(877,127)	029:Dec 2027	(261,378)	030:Jan 2028	355,938	031:Feb 2028	973,254	032:Mar 2028	1,590,569	033:Apr 2028	2,207,885
(2,101,107)	(1,894,136)	(1,626,338)	(1,289,891)	(877,127)	(261,378)	355,938	973,254	1,590,569	2,207,885	2,825,200											

From: Sally Furminger [REDACTED]
Sent: 15 August 2025 13:37
To: localplan@york.gov.uk; [REDACTED]
Cc: Cooke, Alison(City Development); Stockdale, Alison; Suzanne Yates
Subject: RE: CIL Statement of Modifications consultation on behalf of Hungate (York) Regeneration Limited [LICH-DMS.FID580037]
Attachments: CIL Statement of Modifications consultation - Lichfields obo Hungate (York) Regeneration Limited 15.08.25(34089727.3).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.

Dear Sir / Madam

On behalf of our client, Hungate (York) Regeneration Limited (HYRL), please see attached a formal representation to the City of York Council (CoYC) Community Infrastructure Levy (CIL) Draft Charging Schedule Modifications (2025) in order to object to the proposed modifications, in particular Modification 2.

The contact details of Suzanne Yates are below, and also on the attached letter.

Suzanne Yates
Planning Director
BA (Hons) MSc MRTPI

We have confirmed with the Programme Officer under separate cover that Lichfields and Hungate (York) Regeneration Limited wish to participate in CIL Examination in Public in respect of the modifications, and specifically Modification 2.

Should you require any further information, or any clarification on the attached, please let me know. Otherwise, I would be grateful if you could confirm receipt of the attached letter, and that this will be issued to the Inspector in advance of the examination.

Kind regards

Sally

Sally Furminger
Associate Director
BA (Hons) MSc MRTPI

Lichfields.uk 

The Funding Dilemma

Cracking the Business Case code

[VIEW INSIGHT](#)



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Nathaniel Lichfield & Partners Limited (trading as "Lichfields") is registered in England, no. 2778116, registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.

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

ID 140**BY EMAIL****Date:** 15 August 2025**Our ref:** 50370/13/SC/SY/34089727v3

Dear Sir/Madam

CIL Statement of Modifications Consultation**City of York Community Infrastructure Levy (CIL) Draft Charging Schedule Modifications - Representation on behalf of Hungate (York) Regeneration Limited**

On behalf of our client, Hungate (York) Regeneration Limited (HYRL), Lichfields is writing to submit a formal representation to the City of York Council (CoYC) Community Infrastructure Levy (CIL) Draft Charging Schedule Modifications (2025) in order to object to the proposed modifications, in particular Modification 2.

My contact details are as follows:

Suzanne Yates
Planning Director

BA (Hons) MSc MRTPI

[REDACTED]

[REDACTED]

[REDACTED]

As confirmed by separate email to the Programme Officer, Lichfields and Hungate (York) Regeneration Limited wish to participate in the CIL Examination Hearing in respect of the modifications, and specifically Modification 2. Further detail is provided below.

Introduction

In January 2024, on behalf of HYRL, we submitted representations on the draft Charging Schedule and we understand that those are before the Inspector. These latest representations, which are directly related to the 'Hungate' site (ST32), add to those representations, addressing matters raised in the responses to the last representations and objecting to the consequential modifications.

As the Hungate site benefits from outline planning permission, with a number of approved Reserved Matters and standalone applications, CoYC has determined that the Hungate site should not be regarded as a Strategic Site and should instead fall within the 'Residential dwellings within the City of York' category which would incur a fee of £150 per sqm based on the updated CIL Viability Study Addendum (June 2025).

For the reasons outlined in our previous representations it is considered that the Hungate development is unable to support a CIL charge of any amount. The Hungate site (allocation ST32) should therefore be rated at £0 and included in the list of sites under Modification 2. Furthermore, the modelling for Purpose Built Student Accommodation scenario also demonstrates that the Hungate development would be unable to support a CIL charge of any amount. As such, HYRL are unable to support the Draft Charging Schedule as modified. There are three main issues that we wish to raise and discuss at the forthcoming Examination Hearing, which we have registered to attend, as set out below.

1. Context

Hungate (York) Regeneration Limited (HYRL) is a development consortium focused on the delivery of Hungate (ST32). Hungate (ST32) is a large previously developed site (4.6Ha) and is one of three allocated Strategic Sites that are within the designated city centre, and is a key brownfield development scheme within York City Centre which has long been identified as an important regeneration opportunity.

The site is subject to a series of planning approvals for a mix of residential dwellings, shops, offices, leisure uses and community facilities.

Outline planning permission was originally granted for the entirety of the site in 2006 (application ref: 02/03741/OUT) and renewed in 2012 (application ref: 12/02282/OUTM).

Blocks A, B and C (Phase 1) were developed under this original planning permission which is now complete and occupied. Block E was developed under a separate, detailed planning application granted in 2014 (application ref: 13/03015/FULM) and is now complete and occupied.

Following this, a new hybrid planning permission was granted for the remaining phases of development (including Blocks D, F, G and H) in 2017 (application ref: 15/01709/OUTM). This included an updated masterplan which provided detailed proposals for the development of Blocks D and F, and outline parameters for Blocks G and H.

An independent assessment of viability was undertaken at this stage which concluded that the development could not deliver a policy compliant level of affordable housing, and this has formed the benchmark for the determination of applications across the Hungate site, including in recent years, in recognition of the ongoing, and worsening, viability issues with the site.

Block F was developed out under this permission and is now complete and occupied. Reserved matters have been approved for Block G, and a new standalone application approved in respect of Block D, both of which have been implemented on site but remain undeveloped.

The opportunity to submit reserved matters in respect of the outline permission for Block H expired on 25 April 2021. A standalone detailed application was submitted for Block H in February 2021 (ref: 21/00280/FULM) and members resolved to grant planning permission at committee in January 2025 and is awaiting conclusion of the accompanying legal agreement as a result of a significant backlog of legal agreements to be concluded. This latest application was afforded a reduction in the required level of affordable housing in recognition of the ongoing viability issues associated with the site's development and recognition that individual plots on the Hungate site should not be considered in isolation due to the sitewide costs of bringing forward the regeneration of Hungate site. This concept was recognised and agreed with CoYC in 2015 as part of the independent viability assessment undertaken as part of application 15/01709/OUTM, as detailed below.

Whilst it is hoped that planning permission for ref. 21/00280/FULM will be granted prior to the adoption of CIL following conclusion of the legal agreement, the draft Section 106 deed of variation has now been with CoYC for over 6 months and remains outstanding. Should the S106 agreement remain unsigned at the point at which CIL is adopted then this would stifle delivery of this block and likely the deliverability of the remainder of the strategic site as a whole.

Furthermore, it is noted that any subsequent applications to vary or update parts of the wider strategic site in line with operational requirements or market demands would also potentially attract future CIL contributions which would then undermine delivery of this important strategic allocation.

As demonstrated within our previous representations, the Council's Viability Assessment fails to adequately test Hungate, as it does not fit into any typology. Hungate is both a Strategic Site and a large brownfield site which, once completed, seeks to deliver 1,050 new city centre apartments. In this regard paragraph 4.5 of the Viability Study (2022) acknowledges that:

"A separate CIL rate for strategic sites may likely be considered owing to the scale of the build, which incurs additional site and infrastructure opening costs".

Paragraphs 4.41 to 4.44 also recognise that:

"There may be additional costs in bringing a site forward for delivering housing plots, which may depend on the land type and size of the sites.

While such costs within smaller schemes are likely to be absorbed within the allowances for 'externals', this is less likely to be the case on larger Greenfield sites.

Brownfield sites are assumed to include the necessary strategic infrastructure from their existing or previous uses. But developing Brownfield sites delivers different risks in opening costs, such as site demolition of existing buildings and remediation, which can vary significantly in associated costs depending on the site's specific characteristics." [our underlining]

It is Lichfields' opinion that for strategic urban sites (such as Hungate) that are important to the delivery of the Plan strategy, there is a greater imperative to consider viability on a site-by-site basis, not least as there may not be any other sites that would fit into the same broad typology. A hybrid approach of testing notional sites via a typology approach alongside a more bespoke assessment for strategic sites is advocated by planning policy.

This representation sets out the basis for the objection to the CIL rate for the Hungate site (allocation ST32) and why it should be included in the list of sites under Modification 2.

The need to consider site specifics

CoYC has excluded Hungate because it benefits from an extant permission and they state in Section 5 of the Consultation Statement (July 2025) that this is because:

“In line with proportionality, the focus of the CIL Viability Study is on capturing CIL from sites that are yet to secure planning permission.

Should an extant planning permission be amended under Section 73, then it would also be possible for the Council to apply discretionary relief under Regulation 55 for exceptional circumstances in a separate statement. The Council does not intend to introduce exceptional circumstances relief at this time, not least since any changes to a permission may result in a different scheme that should be viability assessed at that time or through subsequent reviews of CIL.”

However, this is an unreasonable approach to adopt as it completely ignores the recognised totality of the significant expense in bringing forward complex, major regeneration projections in the City Centre. If the focus has been on capturing CIL from sites that are yet to secure planning permission, it cannot be right to simply apply other Charges to sites with permission. That does not follow, as it indicates that no consideration has been given to the (current or future) viability of those permitted sites. It is not appropriate to consider the financial case for a varied permission or new applications in isolation, ignoring historic costs in bringing that site forward and providing the necessary upfront infrastructure for it to be delivered.

To date, significant financial investment has been committed to the Hungate site since the original outline planning consent was granted in 2006 to enable the site for development. It has been demonstrated, through individual viability work in support of consented applications, that it was not viable to deliver policy requirements alongside the significant sitewide costs associated with enabling the Hungate site for development.

The latest viability position specifically on the Hungate site was agreed with CoYC in 2015 as part of the independent viability assessment undertaken as part of application 15/01709/OUTM. The committee report in particular noted that:

“3.4 Following a detailed independent viability appraisal the level of affordable housing has been agreed at 17% based on a 60:40 split between social rent and Discount Sale. The detailed provision including unit types and pepper-potting is to be agreed, but will follow the principles set out in the Section 106 agreement and reflected in previous phases. The Housing Development Team support this application.

...

4.31 The Hungate scheme agreed 20.3% affordable housing at outline approval in 2009. Since then local affordable housing targets have been lowered to 20%, and Phase 1 of the development was agreed and built out at that 20% level.

4.32 Phase 2, approved in 2013 and due for completion in 2016, agreed a reduced level of 16% affordable housing following detailed re-appraisal of viability which concluded that increasing (projected) revenues were not quite keeping up with increasing development costs.

4.33 The current application, if implemented instead of the remainder of the extant permission, would result in an increase in total apartments on the whole of the Hungate Regeneration site from 720 to a maximum of 1025 and includes detailed proposals for Blocks D and F, as set out in this report. The scheme viability has been considered having regard to both the elements of the extant permission already built (or in progress), and the new application, and has shifted as unit numbers have increased, together with development costs and projected revenues.

4.34 Following a detailed re-appraisal of the remaining phases of the scheme in recent months, and collaborative working with the developer Lend Lease and independent District Valuation Service (DVS), a 17% proportion of affordable housing has been agreed as a recommended way forward. CYC Officers and the DVS are supportive of this level of provision

...

5.6 Following a detailed re-appraisal of the remaining phases of the scheme, a 17% proportion of affordable housing based on a 60:40 split between social rent and discount sale has been agreed. Officers consider this to be a reasonable offer which acknowledges the relatively high costs of site development and other contributions relating to education, sports / recreation and transport."

The underlining is our emphasis: it illustrates the significant viability challenges that have been continually experienced on the Hungate (ST32) over a sustained period and the need for sitewide costs to be considered as part of viability considerations.

Notwithstanding this, it considered that the general viability of the Hungate site has become significantly more difficult since 2015, due to the regulatory and site-specific requirements (discussed below). Notwithstanding these changes, however, data from BCIS and Land Registry indicates that build cost inflation has significantly outpaced house price inflation for flats and maisonette between December 2015 and February 2025. This would indicate, even if no regulatory impacts had affected the Hungate site during the period as discussed below, that the viability position for the Hungate site, if it were to be re-assessed today, would be worse than the assessment agreed with the CoYC in 2015:

- Change in Average price 'Flats and maisonettes' in York (source: land registry – see Annex 1): 129%
- Change in BCIS All-in TPI and/or BCIS Regional TPI: Yorkshire and the Humber (source: BCIS – see Annex 2): 140 – 148%

At a time when the government is seeking to optimise brownfield sites and support mixed use development in order to deliver new homes, it cannot be right to add additional/new financial burdens on bringing the Hungate development forward – as that will simply stall or undermine development on the site. This is recognised in paragraph 6.22 of the 2022 Viability Assessment acknowledged that “there should be exceptions for several major sites ... since this CIL rate could potentially place these large strategic sites at risk of non-delivery, and potentially undermine the emerging local Plan”.

Regulatory Changes Affecting Hungate (ST32)

By way of example as to why Hungate should be regarded separately from the broader analysis for sites across the City, CoYC state within the Consultation Statement (July 2025) on page 14 that:

“The government has consulted on the Building Safety Act, but the Government has not yet confirmed the required changes to comply with the new Act, so it was not possible to identify the costs impact this will have. However, the likelihood is that the building safety act will only impact higher-risk buildings that are at least 18 metres in height or have at least 7 storeys (as defined in the Building Safety Act consultation). As such, there would be little impact on the bulk of future development anticipated in the City of York under its emerging Local Plan because of the planning constraints relating to tall buildings in the City, which would mean that a 7-storey building would be a very tall building for York.”

The underlining is our emphasis, as the Hungate development is impacted by the Building Safety Act given that each of the three plots yet to be constructed is envisaged to be at least 18m metres in height or have at least seven storeys, meaning it need to comply with the additional requirement of the Building Safety Act and High Risk Buildings gateway processes, and that has clearly been ignored.

These impacts of the Building Safety Act can be categories into physical requirements of the building regulations or associated enhancements arising from the Building Safety Act (such as introductions of second staircases and evacuation lifts) and the notional uplifts for the incorporation of the consultancy, contractor and Building Safety Regulation fees and costs.

The Building Safety Act Cost Model (2024) research from AECOM (see Annex 3) has evidenced that the notional uplifts for the incorporation of the consultancy, contractor and Building Safety Regulation fees and costs is between 1.25%-2% of construction costs.

Impacts of the physical requirements of the Building Safety Act and building regulation increases build costs (due to higher specification requirement such as evacuation lifts and façade enhancements) and decrease Net Saleable Floor Area (due to the requirement for second staircases) which further decreases the viability for buildings affected by the Building Safety Act, such as Hungate. Given that applications for each of the three plots were submitted prior to the introduction of the Building Safety Act, all re-design costs required to comply with the Act further hinder the viability of future development.

Design changes required to comply with the Building Safety Act and current Building Regulations may require change to the extant planning consents (for example to introduce second staircases). It is at CoYC’s discretion whether any changes could be dealt with via planning amendment applications or new planning application: meaning that CIL relief via Section 73 application cannot be guaranteed and the presence of an extant consent does not mitigate the need to consider the viability impacts of CIL on Hungate (ST32).

Further to the Building Safety Act, the UK Government has determined that the Building Safety Levy will come into effect on 1 October 2026.

The Building Safety Levy will be applied to residential developments such as Hungate and alternative use classes, such as PBSA. The proposed rates for York are £15.81/sqm GIA for Previously Developed Land and £31.61/sqm GIA for Non-Previously Developed Land.

None of the above matters have been considered within the Council's viability assessment, which ignores the typology of buildings such as those within Hungate (ST32).

Site Wide Costs Affecting Hungate (ST32)

CoYC state within the Consultation Statement (July 2025) on page 14 that:

"A precise cost for archaeological allowance has not been included. These costs, by their nature, are often harder to estimate and do not apply to every site."

However, the cost of archaeology at Hungate is known and it is significant, due to its central location and planning requirements deemed necessary to enable the site for development. Between 2007 and 2012, HYRL incurred over £2.5m of archaeological sitewide costs alongside a further £0.5m of costs for works required to deliver block E and block F prior to their implementation (note: values have not been adjusted for inflation). Further archaeological planning obligations are imposed onto the buildings yet to be constructed which are anticipated to generate further costs.

Furthermore, CoYC state within the Consultation Statement (July 2025) on page 15 that:

"Each site will differ in terms of potential contamination and demolition requirements. We therefore applied a widely used by the Home England ready reckoner and have allowed inflationary increases. We would also note that this figure is for the average site so there will be sites with more or less abnormal costs than the average."

But in the case of Hungate the abnormal costs such as contamination, demolition, site clearance, remediation, sewer diversions, utility improvements including sub-station relocations, construction of a pedestrian bridge alongside maintenance of the Foss Nature Reserve and Foss River walls, are known and should be considered as part of any viability assessment. Since 2006, HYRL have incurred a further £3m of costs which does not include for the archaeological costs noted above or land assembly costs (note: values have not been adjusted for inflation).

It is unclear, given CoYC's recognition of the specific challenges of the Hungate site as evidenced in independent viability assessment, why Hungate (ST33) has not been holistically assessed in the CoYC's CIL viability assessment given the known presence of these significant site wide costs.

Overall, as noted in paragraph 2.31 of the original Viability Study:

"... the PPG on CIL is clear that if viability is difficult within some areas or types of sites, then these should be set rates that are very low or zero. This is noted in the following paragraph in PPG: "If the evidence shows that the area includes a zone, which could be 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. The same principle should apply where the evidence shows similarly low viability for particular types and/or scales of development."

The revised CIL Viability Study Addendum (June 2025) also notes at paragraph 12 that “*From this analysis, an appropriate rate for non-strategic site delivery of residential dwellings is £150*”. However, Hungate is a Strategic Site and it is clear that viability is difficult at this central location. As such, it is not appropriate to consider and charge Hungate (ST32) as a non-strategic site and it should be rated at zero charge as with other strategic sites.

2. Broader Issues with CIL – Updated Viability Study

Notwithstanding the above and site specific matters, HYRL has the following comments on the viability analysis undertaken for the Council, in relation to Build Costs.

The Council’s Viability Study has used BCIS median build cost values for the midpoint between 1-2 storey and 3-5 storey for the flats and apartments typology using a 1Q 2025 figure of £1,631 /psm GIA.

Hungate is a development containing flats and apartments. Each of the three plots yet to be constructed is envisaged to be at 6 storeys or above. The BCIS median build cost value for apartments that are ‘6 storeys or above’ is £1,973 psm GIA, a 21% (£342 /sqm) increase on what has been assessed.

HYRL’s experience of historic build costs on the Hungate site has been higher than BCIS median build costs, with historic build costs for block F (completed 2019 with costs indexed to 1Q 2025) exceeding £2,400 psm GIA, an increase of over 47% (£769/sqm) compared to has been assessed.

This difference in build costs, even when taken in isolation, is far in excess of the Headroom per CIL liable sqm of any of the categories that have been assessed by the Council and illustrates why Hungate should be regarded separately from the broader analysis for sites across the City.

3. Purpose Built Student Accommodation

We note that many parties have raised issues regarding assumptions on PBSA, which we would agree with. In particular, HYRL notes that:

- The Council’s viability assessment does not make any allowance for the financial impact of nomination agreements as requirement by the Council’s Local Plan policy H7.
- HYRL’s experience of build costs on the Hungate site are significantly in excess of the BCIS median PBSA build costs values that have been used in the Council’s viability assessment, and this is before any consideration for Hungate’s site wide costs is made as noted above.

However, in addition to these points, consideration should also be given to site location, which links to the points raised above.

The statement submitted with our previous representations provided a viability analysis for Hungate for both Build to Rent and Purpose Built Student Accommodation. The assessment confirms that the proposed development is projected to result in a deficit and therefore it would not have capacity to sustain additional CIL payments.

Given the significant costs in bring forward the approved development at Hungate, future development proposing PBSA or Build to Rent would be unable to support a CIL charge of any amount based upon the modelling undertaken.

Therefore, we maintain that the Draft Charging Schedule identifies a CIL charge of £0 for strategic sites, including Hungate (ST32).

Summary

For all of the reasons above, it is concluded that it is reasonable to set a £0 CIL rate for the Hungate site. Modification no. 2 should therefore include ST32.

If you have any questions or would like to discuss this representation in further detail, please do not hesitate to contact me, using the contact details above.

Yours sincerely



Suzanne Yates

Planning Director

BA (Hons) MSc MRTPI

Annex 1: Change in average price: flats and maisonettes in York (source: Land Registry)

Change in Average price Flats and maids 129%

						Average price All property types	Average price Detached houses	Average price Semi-detached houses	Average price Terraced houses	Average price Flats and maisonettes	Pivotable date	
Name	URI	Region	GSS code	Period	Sales volume	Reporting period						
York	http://landreg	E06000014	2015-12	311	monthly		218937	358589	227453	197510	141832	01/12/2015
York	http://landreg	E06000014	2016-01	237	monthly		221189	361821	230099	199378	143435	01/01/2016
York	http://landreg	E06000014	2016-02	244	monthly		224509	367198	233589	202391	145537	01/02/2016
York	http://landreg	E06000014	2016-03	461	monthly		225120	368414	233964	202827	146348	01/03/2016
York	http://landreg	E06000014	2016-04	169	monthly		224954	367532	233590	203065	146234	01/04/2016
York	http://landreg	E06000014	2016-05	258	monthly		223052	362879	231484	201620	145672	01/05/2016
York	http://landreg	E06000014	2016-06	304	monthly		224885	365110	233427	203552	146813	01/06/2016
York	http://landreg	E06000014	2016-07	280	monthly		227961	370248	236383	206393	148956	01/07/2016
York	http://landreg	E06000014	2016-08	327	monthly		230399	375313	238840	208394	150303	01/08/2016
York	http://landreg	E06000014	2016-09	279	monthly		229214	373668	237852	207042	149503	01/09/2016
York	http://landreg	E06000014	2016-10	242	monthly		227162	371551	235940	204360	148512	01/10/2016
York	http://landreg	E06000014	2016-11	285	monthly		228603	375439	237561	204963	149518	01/11/2016
York	http://landreg	E06000014	2016-12	296	monthly		232704	382663	241495	208476	152623	01/12/2016
York	http://landreg	E06000014	2017-01	215	monthly		234401	385538	243053	210198	153612	01/01/2017
York	http://landreg	E06000014	2017-02	207	monthly		231736	380313	239852	208007	152533	01/02/2017
York	http://landreg	E06000014	2017-03	265	monthly		230939	378837	239123	207172	152124	01/03/2017
York	http://landreg	E06000014	2017-04	324	monthly		234589	384205	242593	210606	154996	01/04/2017
York	http://landreg	E06000014	2017-05	324	monthly		240370	392570	248992	215765	158908	01/05/2017
York	http://landreg	E06000014	2017-06	374	monthly		242963	395455	251467	218572	160896	01/06/2017
York	http://landreg	E06000014	2017-07	347	monthly		242084	393548	250950	217534	160421	01/07/2017
York	http://landreg	E06000014	2017-08	391	monthly		240596	391296	249187	216627	159010	01/08/2017
York	http://landreg	E06000014	2017-09	297	monthly		237461	387427	246120	213559	156431	01/09/2017
York	http://landreg	E06000014	2017-10	260	monthly		238174	389358	246973	214148	156438	01/10/2017
York	http://landreg	E06000014	2017-11	275	monthly		236915	388010	246091	212540	155402	01/11/2017
York	http://landreg	E06000014	2017-12	272	monthly		237095	387972	246675	212622	155313	01/12/2017
York	http://landreg	E06000014	2018-01	205	monthly		235173	384712	244692	210910	154073	01/01/2018
York	http://landreg	E06000014	2018-02	260	monthly		234464	383919	243512	210210	153832	01/02/2018
York	http://landreg	E06000014	2018-03	283	monthly		235785	386814	245109	211655	154219	01/03/2018
York	http://landreg	E06000014	2018-04	211	monthly		237678	390157	247483	213750	154788	01/04/2018
York	http://landreg	E06000014	2018-05	276	monthly		242542	398790	253476	218679	156664	01/05/2018
York	http://landreg	E06000014	2018-06	319	monthly		244329	401546	255735	220088	157737	01/06/2018
York	http://landreg	E06000014	2018-07	308	monthly		246518	405924	258014	222151	158873	01/07/2018
York	http://landreg	E06000014	2018-08	371	monthly		245184	403349	256524	220981	158163	01/08/2018
York	http://landreg	E06000014	2018-09	278	monthly		246379	405895	257638	222536	158509	01/09/2018
York	http://landreg	E06000014	2018-10	293	monthly		245855	405008	257281	221693	158322	01/10/2018
York	http://landreg	E06000014	2018-11	338	monthly		246471	407461	258352	222310	157963	01/11/2018
York	http://landreg	E06000014	2018-12	286	monthly		245684	406050	257636	220831	157994	01/12/2018
York	http://landreg	E06000014	2019-01	225	monthly		246375	408012	258416	221368	158232	01/01/2019
York	http://landreg	E06000014	2019-02	255	monthly		247648	409814	259473	222039	159746	01/02/2019
York	http://landreg	E06000014	2019-03	193	monthly		248526	411361	260622	223255	159677	01/03/2019
York	http://landreg	E06000014	2019-04	235	monthly		248725	410361	260991	223960	159552	01/04/2019
York	http://landreg	E06000014	2019-05	224	monthly		246812	406162	259243	222835	157720	01/05/2019
York	http://landreg	E06000014	2019-06	249	monthly		246969	406175	259453	222923	157957	01/06/2019
York	http://landreg	E06000014	2019-07	311	monthly		247173	406350	259479	223267	158179	01/07/2019
York	http://landreg	E06000014	2019-08	326	monthly		250665	412355	262897	226677	160233	01/08/2019
York	http://landreg	E06000014	2019-09	331	monthly		252641	415394	264436	229012	161500	01/09/2019
York	http://landreg	E06000014	2019-10	316	monthly		250585	412324	262905	226843	159712	01/10/2019
York	http://landreg	E06000014	2019-11	326	monthly		247626	408253	260298	223625	157571	01/11/2019
York	http://landreg	E06000014	2019-12	249	monthly		246332	407014	259618	222071	156021	01/12/2019
York	http://landreg	E06000014	2020-01	186	monthly		249815	412971	263092	225534	157931	01/01/2020
York	http://landreg	E06000014	2020-02	233	monthly		250084	413305	263303	226136	157802	01/02/2020
York	http://landreg	E06000014	2020-03	211	monthly		251357	415185	264559	227425	158618	01/03/2020
York	http://landreg	E06000014	2020-04	78	monthly		251260	416077	264608	227878	157355	01/04/2020
York	http://landreg	E06000014	2020-05	105	monthly		253489	419723	267310	229469	158901	01/05/2020
York	http://landreg	E06000014	2020-06	182	monthly		252689	418024	266755	229072	157878	01/06/2020
York	http://landreg	E06000014	2020-07	201	monthly		250691	413274	264483	227129	157541	01/07/2020
York	http://landreg	E06000014	2020-08	192	monthly		249520	411392	263183	226793	156021	01/08/2020
York	http://landreg	E06000014	2020-09	262	monthly		250404	413973	264011	227540	156285	01/09/2020

York	http://landreg E06000014	2020-10	298 monthly	254470	422558	268464	231153	157980	01/10/2020
York	http://landreg E06000014	2020-11	297 monthly	260532	433491	274616	236580	161728	01/11/2020
York	http://landreg E06000014	2020-12	339 monthly	263472	438568	277526	239490	163401	01/12/2020
York	http://landreg E06000014	2021-01	269 monthly	265348	438539	279151	241293	166118	01/01/2021
York	http://landreg E06000014	2021-02	365 monthly	264080	432880	277452	240346	166972	01/02/2021
York	http://landreg E06000014	2021-03	481 monthly	269355	437697	282394	245351	172336	01/03/2021
York	http://landreg E06000014	2021-04	294 monthly	272428	442898	285357	248158	174476	01/04/2021
York	http://landreg E06000014	2021-05	274 monthly	279847	456030	293138	254898	178754	01/05/2021
York	http://landreg E06000014	2021-06	630 monthly	282130	459136	295422	257585	179911	01/06/2021
York	http://landreg E06000014	2021-07	220 monthly	280286	456536	294161	255555	178242	01/07/2021
York	http://landreg E06000014	2021-08	289 monthly	275792	450696	290330	251157	174151	01/08/2021
York	http://landreg E06000014	2021-09	559 monthly	273744	448935	288936	248848	171841	01/09/2021
York	http://landreg E06000014	2021-10	170 monthly	279474	462364	294898	253617	174260	01/10/2021
York	http://landreg E06000014	2021-11	280 monthly	285029	472641	300667	258460	177570	01/11/2021
York	http://landreg E06000014	2021-12	274 monthly	290648	484719	306722	263315	179994	01/12/2021
York	http://landreg E06000014	2022-01	238 monthly	289504	480912	305925	263034	178838	01/01/2022
York	http://landreg E06000014	2022-02	224 monthly	290264	481205	306728	264013	179556	01/02/2022
York	http://landreg E06000014	2022-03	241 monthly	286083	474328	302862	259882	176793	01/03/2022
York	http://landreg E06000014	2022-04	268 monthly	289131	478697	305696	263145	178831	01/04/2022
York	http://landreg E06000014	2022-05	244 monthly	296317	490174	313516	270231	182421	01/05/2022
York	http://landreg E06000014	2022-06	255 monthly	303400	500637	320814	277394	186705	01/06/2022
York	http://landreg E06000014	2022-07	239 monthly	310041	510770	328305	283931	189985	01/07/2022
York	http://landreg E06000014	2022-08	310 monthly	310858	511598	329020	285468	189819	01/08/2022
York	http://landreg E06000014	2022-09	288 monthly	315095	518950	333515	289777	191568	01/09/2022
York	http://landreg E06000014	2022-10	250 monthly	314171	518963	332584	288411	190835	01/10/2022
York	http://landreg E06000014	2022-11	276 monthly	310337	513961	328525	284440	188412	01/11/2022
York	http://landreg E06000014	2022-12	238 monthly	309080	511623	327166	283163	188009	01/12/2022
York	http://landreg E06000014	2023-01	177 monthly	307384	508819	325573	281523	186850	01/01/2023
York	http://landreg E06000014	2023-02	167 monthly	309091	512533	327199	282494	188366	01/02/2023
York	http://landreg E06000014	2023-03	215 monthly	302913	504264	321026	275698	184563	01/03/2023
York	http://landreg E06000014	2023-04	159 monthly	302842	504741	320821	275315	184750	01/04/2023
York	http://landreg E06000014	2023-05	155 monthly	300129	498723	318224	272746	183525	01/05/2023
York	http://landreg E06000014	2023-06	183 monthly	306925	508296	325040	279946	187646	01/06/2023
York	http://landreg E06000014	2023-07	192 monthly	309104	510285	327452	282534	188871	01/07/2023
York	http://landreg E06000014	2023-08	238 monthly	312490	516390	331038	286507	189801	01/08/2023
York	http://landreg E06000014	2023-09	226 monthly	308097	509369	326584	282671	186638	01/09/2023
York	http://landreg E06000014	2023-10	223 monthly	304882	503642	322964	279688	185097	01/10/2023
York	http://landreg E06000014	2023-11	201 monthly	302339	499991	320658	276481	183886	01/11/2023
York	http://landreg E06000014	2023-12	193 monthly	297837	492056	316004	272066	181542	01/12/2023
York	http://landreg E06000014	2024-01	146 monthly	303160	501644	321568	277173	184291	01/01/2024
York	http://landreg E06000014	2024-02	205 monthly	304219	501334	322574	279005	184954	01/02/2024
York	http://landreg E06000014	2024-03	234 monthly	310059	509878	328074	284792	189261	01/03/2024
York	http://landreg E06000014	2024-04	191 monthly	307508	503533	325281	282731	188406	01/04/2024
York	http://landreg E06000014	2024-05	220 monthly	305423	499074	322758	280893	187850	01/05/2024
York	http://landreg E06000014	2024-06	216 monthly	305735	499051	323483	281439	187510	01/06/2024
York	http://landreg E06000014	2024-07	300 monthly	309361	504646	327473	285548	188724	01/07/2024
York	http://landreg E06000014	2024-08	255 monthly	315376	514712	333893	291879	191224	01/08/2024
York	http://landreg E06000014	2024-09	181 monthly	318090	520927	337442	294295	191464	01/09/2024
York	http://landreg E06000014	2024-10	251 monthly	312738	514111	331890	288400	188437	01/10/2024
York	http://landreg E06000014	2024-11	223 monthly	309348	509621	329024	284393	186245	01/11/2024
York	http://landreg E06000014	2024-12	194 monthly	307246	506151	326687	282418	185143	01/12/2024
York	http://landreg E06000014	2025-01	178 monthly	305903	504141	325881	281480	183206	01/01/2025
York	http://landreg E06000014	2025-02	157 monthly	304052	499031	322947	280301	183571	01/02/2025
York	http://landreg E06000014	2025-03	284 monthly	305832	495936	324213	282162	188094	01/03/2025
York	http://landreg E06000014	2025-04	monthly	307638	496330	325313	283579	191656	01/04/2025
York	http://landreg E06000014	2025-05	monthly	307347	495766	324838	283165	191899	01/05/2025

Annex 2: Change in BCIS All-in TPI and/or BCIS Regional TPI: Yorkshire and the Humber (source: BCIS)

Series:	BCIS Regional TPI: Yorkshire and the Humber					Change in Period	Series:	BCIS All-in TPI					BCIS Regional TPI: Yorkshire and the Humber and BCIS All-in TPI	BCIS All-in TPI Only
Series number:	267		quarterly				Series number:	101		quarterly				
Base:	2010 mean = 100						Base:	1985 mean = 100						
Last updated:	13-Jun-2025						Last updated:	13-Jun-2025						
Notes:	Derived index based on BCIS Tender Price Studies													
Downloaded:	13-Aug-2025 18:03						Downloaded:	13-Aug-2025 18:01						
Date	Index	Status	quiv. Sampl	Percentage	change		Date	Index	Status	Equivalent sample	entage	change		
				On year	On quarter						On year	On quarter		
Feb-2015	126		13	8.6	3.3		Feb-2015	266		134	7.7	2.7		
May-2015	129		12	10.3	2.4		May-2015	272		125	5.0	2.3		
Aug-2015	129		11	6.6	0.0		Aug-2015	271		125	5.4	-0.4		
Nov-2015	128		10	4.9	-0.8	100%	Nov-2015	270		120	4.2	-0.4	n/a	100%
Feb-2016	130		10	3.2	1.6		Feb-2016	275		121	3.4	1.9		
May-2016	132		9	2.3	1.5		May-2016	282		122	3.7	2.5		
Aug-2016	131		15	1.6	-0.8		Aug-2016	281		125	3.7	-0.4		
Nov-2016	136		16	6.3	3.8		Nov-2016	291		123	7.8	3.6		
Feb-2017	140		15	7.7	2.9		Feb-2017	301		122	9.5	3.4		
May-2017	142		14	7.6	1.4		May-2017	307		117	8.9	2.0		
Aug-2017	142		13	8.4	0.0		Aug-2017	306		112	8.9	-0.3		
Nov-2017	147		11	8.1	3.5		Nov-2017	317		106	8.9	3.6		
Feb-2018	151		10	7.9	2.7		Feb-2018	326		98	8.3	2.8		
May-2018	151		9	6.3	0.0		May-2018	326		94	6.2	0.0		
Aug-2018	152		9	7.0	0.7		Aug-2018	327		90	6.9	0.3		
Nov-2018	153		8	4.1	0.7		Nov-2018	330		85	4.1	0.9		
Feb-2019	154		8	2.0	0.7		Feb-2019	331		74	1.5	0.3		
May-2019	156		7	3.3	1.3		May-2019	335		66	2.8	1.2		
Aug-2019	156		7	2.6	0.0		Aug-2019	335		62	2.4	0.0		
Nov-2019	155		6	1.3	-0.6		Nov-2019	333		56	0.9	-0.6		
Feb-2020	156		5	1.3	0.6		Feb-2020	335	Provisional		1.2	0.6		
May-2020	156		5	0.0	0.0		May-2020	335	Provisional		0.0	0.0		
Aug-2020	153		4	-1.9	-1.9		Aug-2020	330	Provisional		-1.5	-1.5		
Nov-2020	152		4	-1.9	-0.7		Nov-2020	328	Provisional		-1.5	-0.6		
Feb-2021	152		3	-2.6	0.0		Feb-2021	328	Provisional		-2.1	0.0		
May-2021	153		3	-1.9	0.7		May-2021	331	Provisional		-1.2	0.9		
Aug-2021	156		3	2.0	2.0		Aug-2021	339	Provisional		2.7	2.4		
Nov-2021	158		2	3.9	1.3		Nov-2021	344	Provisional		4.9	1.5		
Feb-2022	159		2	4.6	0.6		Feb-2022	349	Provisional		6.4	1.5		
May-2022	166		2	8.5	4.4		May-2022	365	Provisional		10.3	4.6		
Aug-2022	168		2	7.7	1.2		Aug-2022	371	Provisional		9.4	1.6		
Nov-2022	170		1	7.6	1.2		Nov-2022	375	Provisional		9.0	1.1		
Feb-2023	170		1	6.9	0.0		Feb-2023	379	Provisional		8.6	1.1		
May-2023	172		1	3.6	1.2		May-2023	383	Provisional		4.9	1.1		
Aug-2023	173		1	3.0	0.6		Aug-2023	386	Provisional		4.0	0.8		
Nov-2023	174		1	2.4	0.6	136%	Nov-2023	388	Provisional		3.5	0.5	136%	
							Feb-2024	390	Provisional		2.9	0.5		
							May-2024	392	Provisional		2.3	0.5		
							Aug-2024	394	Provisional		2.1	0.5		
							Nov-2024	397	Provisional		2.3	0.8		
							Feb-2025	399	Provisional		2.3	0.5	140%	148%
							May-2025	401	Provisional		2.3	0.5		



Annex 3: Building Safety Act, Cost Model (AECOM)

WITHOUT
LIMITS

AECOM

Building Safety Act

Cost model

An edited version of this article first appeared
in Building magazine in August 2024

Delivering a better world

Building Safety Act

The UK's Building Safety Act was given Royal Assent in April 2022, with secondary legislation following throughout 2022 and 2023. Since then, the UK construction industry has been grappling with its implications, with early movers attempting real-world applications of the new rules. Despite uncertainty around its delivery, the Act is a statutory requirement the industry must learn how to meet, as AECOM's **James Barton** and **Edward Steiger** report.



Introduction

The UK's Building Safety Act 2022 represents a significant shift in the design, construction, and management of buildings.

The Act was in part a response to the 2017 Grenfell Tower tragedy, in which 72 people died in the fire in the high-rise tower block in West London. The Act seeks to ensure that the safety of future building occupants is placed front and centre of the building control process.

The Act's requirements are wide-ranging, and impose new obligations on all construction projects and dutyholders. In this article, we will focus primarily on cost and programme issues for 'higher-risk buildings'.

Higher-risk buildings are defined as buildings containing at least two units of accommodation in England, or one unit of accommodation in Wales, that are either 18m or higher, or contain seven or more storeys. The full definition of a higher-risk building is contained in s.65 of "The Building Safety Act 2022" for England and regulation 3 of "The Building Safety (Description of Higher-Risk Building) (Design and Construction Phase) (Wales) Regulations 2023" for Wales. ➡

An overview of the new regime for higher-risk buildings

One of the key changes under the Act was the creation of the Building Safety Regulator (BSR), part of the Health & Safety Executive. The BSR's key functions include overseeing safety and standards in all buildings, helping to improve the competence of building control professionals, and acting as the building control authority for higher-risk buildings. To obtain building regulation approval through the BSR, developers of higher-risk buildings must pass through a new 'gateway' process. The gateways act as hard stops at key stages in the lifecycle of a construction project, requiring specific information to be submitted and approved by the regulator before the project can move forward or obtain its completion certificate.

The gateway process for building control approval in higher-risk buildings

In order to obtain building control approval, higher-risk buildings must now pass through three gateways. The first is at the planning approval stage; the second prior to starting on site; and the third prior to occupation, to ensure that compliance with the building regulations is being achieved.

To provide further context for the remainder of this article, the outline requirements of the gateway process is set out on the right, based on the HSE guidance *'Building Control: An overview of the new regime.'*

“

The BSR's key functions include overseeing safety and standards in all buildings, helping to improve the competence of building control professionals, and acting as the building control authority for higher-risk buildings.

The gateway process



Gateway One: Planning stage

- The first gateway ensures that fire safety considerations are baked into the design proposals of a building at an early stage.
- Local planning authorities (LPAs) must seek advice from the BSR (who become a statutory consultee) for higher-risk buildings, and a fire statement for full planning applications must be provided.
- The timescales for this involvement should follow the statutory timescales for the determination of the planning application, so no additional time will generally be required for this stage.



The completion certificate application requires submission of the final ‘as built’ drawings and documents.



Gateway Two: Building control approval application (Prior to start on site)

- The second gateway is the building control approval application. Construction cannot begin until the BSR has approved the gateway two application.
- The submission must provide a comprehensive outline of the work that will be carried out; information about the building itself and the people involved in the building; the client, principal contractor, and principal designer must all be named. Other gateway two submission requirements include a construction control plan, setting out how building work will be managed to maintain building regulations compliance, and a building regulations compliance statement including setting out the overall reasons for the approach adopted.
- A change control plan must also be provided to explain how any proposed changes will be considered; and where relevant, a partial completion strategy.
- The current determination period for a Gateway 2 application in the regulations is twelve weeks — although this can be extended by agreement with applicants.



Gateway Three: Completion certificate application (Prior to occupation)

- The final gateway is the building control completion certificate application. It is critical, as the building cannot be occupied until it is registered with the BSR. Registration requires the completion certificate to have been issued.
- The completion certificate application requires submission of the final ‘as built’ drawings and documents. This should mirror the Gateway 2 submission, varied only by any approved changes. It is also accompanied by a compliance declaration from each of the key construction stage dutyholders (client, principal designer and principal contractor) that the building satisfies all applicable functional requirements of the building regulations.
- The BSR have eight weeks to review Gateway 3 applications. It is also worth noting that current BSR guidance indicates that full completion of buildings will be expected — not, for example, the handover of groups of floors on a rolling basis.

Change control in higher-risk buildings

When implementing the new rules, a key issue to consider from a cost and programme perspective is change control.

Following Gateway 2 approval, most changes which alter the approved Gateway 2 design must be notified to the regulator. Changes requiring BSR involvement are split into two groups: major changes, and notifiable changes. For a major change, the BSR will need to approve the change prior to it being implemented. The period for reviewing and approving the change is six weeks.

For a notifiable change, the change can be commenced as soon as notification has been sent to the BSR. However, the BSR have the option to re-categorise the change if they believe it should be a major change. Given these additional interactions with the BSR, it is highly likely that in the short term, clients will want to minimise any changes that occur after the submission of Gateway 2. This is likely to factor into the procurement route decisions taken at the outset.

Procurement route considerations

The scope and nature of the gateway and change control regime will place constraints on the way a project can be designed and procured: we will set out some of the key considerations in the remainder of this cost model. We have assumed that most clients will progress their design to RIBA Stage 4 prior to making a Gateway 2 application, although this is not mandated by the BSR.

The first consideration for any project is, what are the possible procurement routes under the new regime? As with all such decisions, there are several trade-offs to consider here. Principal amongst them are programme duration, market competition, likelihood of change and allocation of risk.

Prior to the enactment of the Building Safety Act, the procurement route for what is now defined as a higher-risk building may typically have been a single-stage design and build procurement route.

A schematic programme for this route is set out in figure 1. In broad terms, this route would allow the client to get the benefit of competition between tendering contractors, transfer the design risk to the contractor and provide the opportunity to start on site with early packages prior to the conclusion of the RIBA Stage 4 design.

Following the introduction of the Act, that picture changes in several regards. In terms of making a start on site, there are additional time periods that will need to be factored in when assessing the viability of schemes.

Firstly, the time taken to prepare, submit and — most importantly — get approval of the Gateway 2 application needs to be factored into the overall programme. Whilst preparation and submission can no doubt be overlapped with the end of the design phase, the 12-week approval period will represent additional time. Additionally, the opportunity to overlap some early on-site packages with completion of the RIBA Stage 4 design is likely to be lost. Although demolition can be completed prior to a Gateway 2 approval, permanent works such as piling cannot. As can be seen in figure 2, this could add as much as eight months to the programme, depending on how this is handled.

So, what are the other options? Figure 3 shows three further procurement options and the schematic view on how long each one could take to start on site. This is based on assumptions of six months for RIBA Stage 3 design, nine months for RIBA Stage 4 design, three months for Gateway 2 approval, and various tender and approval timelines specific to each route.

In summary, we anticipate that two stage procurement routes (either design and build, or traditional) will generally provide an earlier start on site date than single stage routes. The key reason for this is that two-stage routes generally provide a greater opportunity to overlap tender events with design, and also with the preparation of the Gateway 2 application.

As well as potentially providing a programme benefit, we also anticipate that early engagement with the contractor will provide further benefits in the post-BSA landscape as well. In particular, with the requirement for the Principal Contractor to be named within the Gateway 2 submission, owners and developers will want to know that the contractor is aligned to the key technical solutions that are incorporated within the Stage 3 design. This should help to limit the client's exposure to change — both within later design stages and, more importantly, within the BSR change control regime once the project has passed through Gateway 2.

When considering risk allocation (and specifically design risk), we expect that clients will generally prefer the contractor to own the design risk. This makes design and build the more attractive option between the traditional route, and the design and build route. This becomes more significant when considered in the context of who owns the risk of delays with either the Gateway 2 or Gateway 3 approvals.

We anticipate that clients will continue to own the risk of delayed approval if the regulator cannot meet their statutory timeframes. In contrast, contractors will own the risk of delayed approval when that is linked to either incomplete information or non-compliant design for which they were responsible.

Whilst a two-stage traditional route may offer the fastest notional route to a start on site, we feel that the risk of post-Gateway 2 approval changes — and the potential exposure to delay costs as a consequence — may push more clients towards the design and build route.

The new regime is likely to make other procurement options less attractive. For example, the focus on completing more design prior to works starting on site means one of the principal benefits of construction management as a procurement route is likely to be lost.

Schematic programmes

Figure 1

Pre-BSA single stage design and build



Figure 2

Post BSA single stage design and build

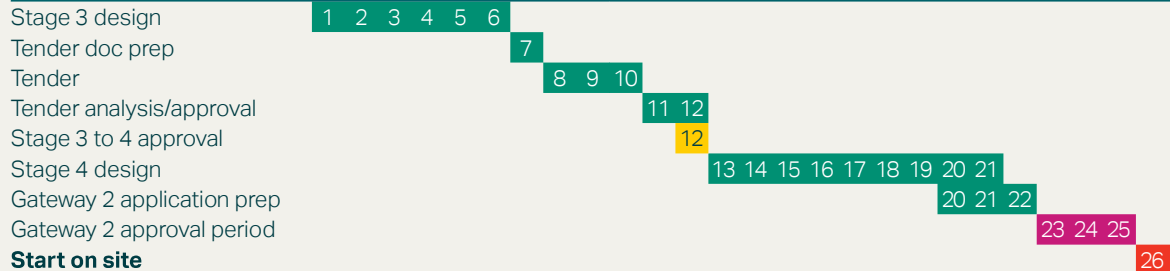
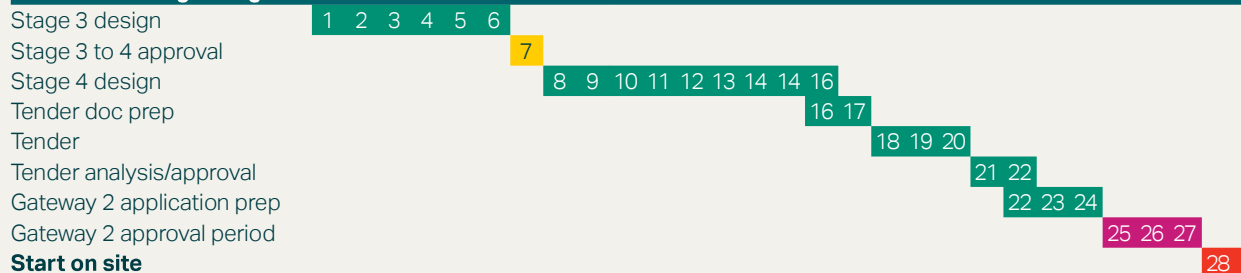
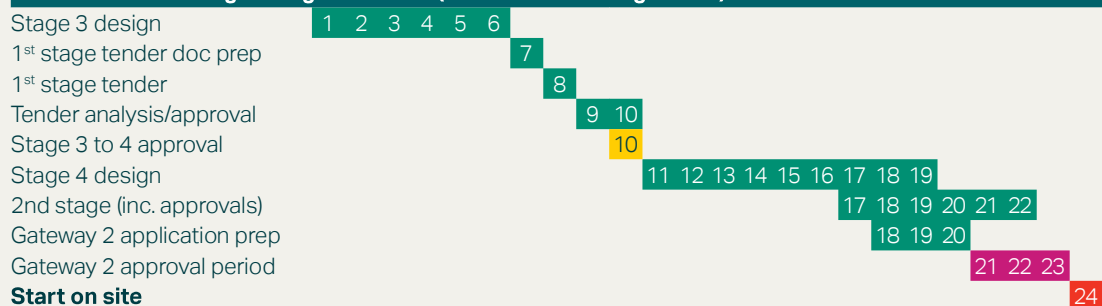


Figure 3

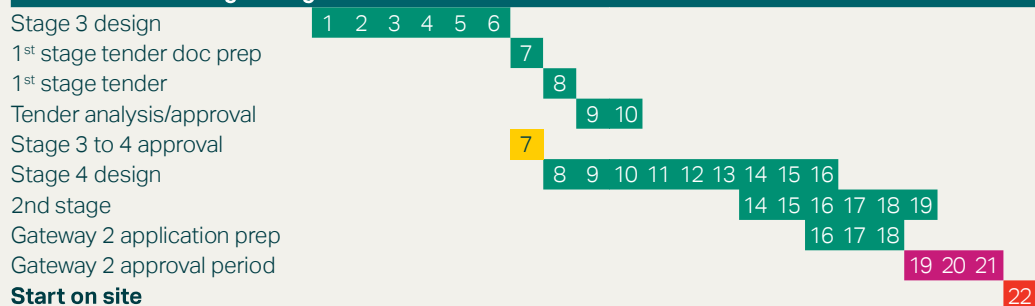
Post BSA — Single stage traditional



Post BSA — Two stage design and build (with novated design team)



Post BSA — Two stage design and build



Programme considerations

One of the Building Safety Act's biggest impacts is likely to be that typical project programmes will extend. In addition to the Gateway 2 approval period, and the loss of overlap between early on site works packages and the end of the design stage, there are further programme considerations to consider.

For example, the level of control the employer has over contractor start on site may have an impact on programme. As this is likely to be linked to the approval of the Gateway 2 application, the employer may not be able to give the instruction to commence until they are holding approval (depending on the length of any demolition or enabling works at the beginning of the programme).

Depending on the visibility of the timing of approvals from the regulator, this could potentially add several weeks to the programme — and possibly longer-term delays, depending on the contractor's ability and availability to mobilise.

Completion and handover may also be impacted. In larger schemes, groups of apartments or floors are typically completed and handed over early, prior to completion of the overall building. The available guidance suggests that such handover strategies will no longer be suitable. Accordingly, clients will need to factor in higher hold costs at the end of the project, as earlier completed units will not be able to be handed over until the entirety of the building is signed off.

Other considerations

The change control regime post-Gateway 2 may also encourage clients to adopt a 'right first time' attitude with regards to their brief. Whilst there will always be some changes that arise during construction, clients will no doubt be keen to minimise post-Gateway 2 design changes given the potential delays and costs that may cause.

Another consideration is the overall approach of the industry towards value engineering and buying gains. Once the Gateway 2 application is approved, it may reduce the appetite of contractors to offer value engineering options during their procurement of the project, knowing that such options may introduce delay or uncertainty into the process.

The future

While there are undoubted cost implications for developing projects under a new regime, the less-discussed upside is increased value. Assets which can demonstrate full compliance with building safety standards may well be more attractive not only to eventual occupants, but also to investors in search of high-quality assets.

To date, more than 12,000 higher-risk buildings have been registered with the BSR and all higher-risk buildings in occupation will need to apply for a Building Assessment Certificate when called upon to do so by the BSR. There is much talk about stranded assets in respect of net zero carbon, but failure to comply with the requirements of the BSA is a new stranded asset risk for existing buildings.

This may throw up concerns and liability about existing stock, that may also affect the new build market going forward.

We may see a shift in the building ownership market over time as a result of the duties now in place under the Act. It is possible 'light touch' ownership may disappear, as the implications of the various duty holder requirements become more apparent.

Similarly, the Act's 'golden thread' requirement should also improve the quality of handover and as-built documentation. It will also mean that as work takes place on buildings down the line, industry knows what it is working with, rather than finding it out as the work plays out. The payback — both from a safety and economic perspective — should be significant in the long term.

As the Building Safety Act works its way into real-world application, it will quickly become apparent what responsibly and safely developing, constructing and owning a building entails.

Whilst the industry undoubtedly faces a teething period as it gets to grips with the new rules, our overall obligation to occupiers should bring forward significant long-term benefits in the quality of built residential projects.

This is a transitional stage, where there is no business-as-usual or well-trodden path to follow. The hope and the intention is that the Building Safety Act engenders more high-quality buildings: homes that are built with transparency, care and in anticipation of their whole service life.

A background image of a city skyline at dusk, with a vibrant rainbow arching across the sky. The city features a mix of modern skyscrapers and older residential buildings, with the Shard being a prominent landmark. The lighting is soft, suggesting the 'blue hour'.

Similarly, the Act's
'golden thread'
requirement should
also improve the
quality of handover
and as-built
documentation.

12,000

Higher-risk buildings have been registered with the BSR and all higher-risk buildings in occupation will need to apply for a Building Assessment Certificate when called upon to do so by the BSR.

Building Safety Regulators Charges

Under the building Safety (Regulators Charges) Regulations 2023, there are a series of functions outlined that will be charged, who will pay and the basis of the charges.

The key items are outlined below, but the comprehensive list can be found at <https://www.hse.gov.uk/building-safety/assets/docs/charging-scheme.pdf>

Schedule ref	Submission details	Fees/Charges	Responsibility
1	Submission and consideration of a building control application for HRB work or stage of HRB work or other work where BSR is the Building Control authority. mission of an application (Schedule 1)	£180 charge with application; plus £144 per hour worked for BSR staff; plus Any costs to BSR of relevant authorities and third parties.	Client
2	Further applications are required for any dispensations on elaxations where the regulator is the building control authority (Schedule 2)	£108 charge with application; plus £144 per hour worked for BSR staff; plus Any costs to BSR of relevant authorities and third parties.	Client
6	The inspection and testing of any work to which building regulations are applicable, or of a building involving such work, including the testing of services, fittings and equipment (and taking samples) to ensure that the work complies with the requirements of building regulations (Schedule 6)	£144 per hour worked for BSR staff; plus any costs to BSR of relevant authorities and third parties.	
8	Consideration of a notifiable change during the design and construction phase and any decision to specify a change as a notifiable change or a major change (Schedule 8)	£108 charge with notification to the regulator; plus £144 per hour worked for BSR staff; plus Any costs to BSR of relevant authorities and third parties.	Client
9	Consideration of and the determination of a change control application (including any preparation for, notification, and consultation undertaken by the BSR) and decision to reject or approve the application (Schedule 9)	£180 charge with application; plus £144 per hour worked for BSR staff; plus Any costs to BSR of relevant authorities and third parties.	Client
10	Submission of a partial completion certificate application or completion certificate application. The consideration of a completion certificate application, or partial completion certificate application, once the relevant building work has finished. BSR will assess the application and may carry out an inspection to determine whether the work has been carried out in accordance with building regulations and is consistent with the as-built plans submitted as part of the application (Schedule 10)	£216 charge with application; plus £144 per hour worked for BSR staff; plus any costs to BSR of relevant authorities and third parties.	Client

Source: <https://www.hse.gov.uk/building-safety/assets/docs/charging-scheme.pdf>



Under the building Safety (Regulators Charges) Regulations 2023, there are a series of functions outlined that will be charged, who will pay and the basis of the charges.

Cost implications of the Building Safety Act	
Programme/ Timescales	<ul style="list-style-type: none">- Additional timescales for Gateway applications, assessment and determination will increase the time related input of consultants and contractors resource costs- Ultimately the increased development programme and overall completion does have an inevitable effect on inflation, peak debt exposure (particularly at Gateway 3) and the demand for additional finance
Procurement and early involvement	<ul style="list-style-type: none">- The need to appoint the 'Principal contractor' on HRB's earlier in the process to actively engage in the design and Gateway 2 application forms a fundamental part of the BSA legislation. This shift in procurement strategy may however result in reduced price certainty/fixity as well as greater risk for clients based on lesser developed design information- To compensate, alternative two-stage procurement approaches on HRB's are likely to become more prevalent, albeit if the second stage is unsuccessful, any change in contractor will necessitate a change control application
Designers and consultants	<ul style="list-style-type: none">- Introduction of the 'Principal Designer' for management of the Golden Thread throughout the project lifecycle is a new defined role- Expanded roles and responsibilities associated with accountability and BSA compliance will need to be included in Designers scope of services and fees- Indirect costs of BSA awareness, training, CPD and business integration into best practice and quality assurance
Contractors	<ul style="list-style-type: none">- Greater responsibility for ensuring compliance with Building Safety Regulations and the long-term safety and integrity of buildings will demand the need for conducting increased testing and inspection regimes, enhanced quality and change control processes and the implementation of additional safety measures, which may layer in further costs- The onus to manage 'major' or 'notifiable' changes as part of any amendments to the design, materials or construction of the development have the potential to cause delays and cost — and major changes cannot be commenced until the BSR have approved the change- Additional caretaker costs may be required for the contractor to hold and maintain the site during the gateway 3 approval process (when works are complete)
General	<ul style="list-style-type: none">- Building Safety Regulator Fees will be incurred in addition to the reimbursable costs of the regulators staff to assess the applications https://www.hse.gov.uk/building-safety/assets/docs/charging-scheme.pdf- Increased demand and shortages of principal designers, fire engineers, safety professionals including the Regulator themselves could lead to delays in the approval process, as well as continuing pressure on salary increases- Enhanced BSA responsibilities, risk profile and exposure to claims may affect Professional Indemnity and Contractors All Risk (CAR) insurance resulting in policy restrictions, premiums and additional conditions

Building Safety Act — Notional cost model

This cost model is based on a notional high-risk building of £100m construction costs and assumes a construction programme of approximately 30 months. The cost model includes the notional uplifts for the incorporation of the consultancy, contractor and Building Safety Regulation fees and costs.

The cost model does not include the effect of the physical requirements of the building regulations or associated enhancements arising from the building Safety Act (e.g. second staircase introduction, etc). Costs are at 3rd Quarter 2024 prices and exclude any client specific development costs (i.e. finance, etc).

Cost implication of the Building Safety Act

Ref	Description	Quantity	Unit	Rate	Total	Total	% of total
1.0	Principal design fees and pre-contract support						
1.1	Appointment of principal designer to carry out new Building Control PD Roles and responsibilities (say £100,000 to £150,000)		Item		125,000		
1.2	Additional pre contract specialist design/consultancy support (Structure, MEP, fire engineering, etc)		Item		25,000		
1.3	Indirect consultant costs associated with training, CPD and business integration (assumed sunk costs of business to participate and deliver services in market)		Item		Nil		
1.4	Expanded roles and responsibilities in designer scope of services (deemed to be incorporated as part of regulatory approval and governance processes)				100,000		
	Sub Total				250,000	250,000	13.55%
2.0	BSA Gateway 2 application						
2.1	Submission and consideration of a Building Control Application for High Risk Buildings (where BSR is Building Control Authority)						
2.1.1	Application Charge	1	NR	180	180		
2.1.2	BSR staff costs and relevant third party support , say, 350 hours (8-10 weeks) @ £144/per hour	350	Hours	144	50,400		
2.2	Allowance for clients consultant team to respond and provide response to queries and relevant updates during review process				10,000		
	Sub Total				60,580	60,000	3.25%




This cost model is based on a notional high-risk building of £100m construction costs and assumes a construction programme of approximately 30 months.

Ref	Description	Quantity	Unit	Rate	Total	Total	% of total
3.0	Change control and notifiable change						
3.1	Consideration of a notifiable of major change during the design or construction phases. Assumed changes will be kept to a minimum due to the potential implications of delay to the programme. For the purpose of the cost model it is deemed that two notifiable changes are included						
3.1.1	Application Charge	2	NR	180	216		
3.1.2	BSR staff costs and relevant third party support , say, 2 weeks @40 hours resource input per change @2nr changes @ £144/hour	160	Hours	144	23,040		
	Sub Total				23,256	25,000	1.36%
3.2	Consideration of and the determination of a change control application (including any preparation for, notification, and consultation undertaken by the BSR)						
3.2.1	Application Charge	1	NR	180	180		
3.2.2	BSR staff costs and relevant third-party support, say 2 weeks @40 hours @£144/hour	80	Hours	144	11,520		
	Sub Total				11,700	15,000	0.81%

Ref	Description	Quantity	Unit	Rate	Total	Total	% of total
4.0	Procurement and PCSA's						
4.1	Anticipated procurement route typically adapting from single stage to two stage procurement routes for High Risk Buildings (albeit this route may already be factored into some clients and projects preferred procurement routes)						
4.2	PCSA and early main contractor involvement during Stage 4 design process and two stage tender approach	6	Months	75,000	450,000		
4.3	Specialist Sub contractor design input (MEP, Lifts, Facades, etc)				100,000		
	Sub Total				550,000	550,000	29.81%
5.0	Contractor resourcing and responsibilities (construction period)						
5.1	Additional roles and responsibilities associated with enhanced quality procedures and change control process including implementation of further safety measures						
5.2	Additional project management, governance, and change control input during construction period, 30 months @ £ 8,000/month @ 50% of time	30	Months	4,000	120,000		
5.3	Additional inspections				25,000		
5.4	Premium associated with CAR Insurances/PI Insurance (subject to individual business and risk performance)			Subject to each business			
5.5	Additional caretaker costs during Gateway 3 approval process	3	Months	8000	24,000		
	Sub Total				169,000	170,000	9.21%

Ref	Description	Quantity	Unit	Rate	Total	Total	% of total
6.0	Contractor resourcing and responsibilities (construction Period)						
6.1	Submission and consideration of a completion certificate application, or partial completion certificate application, once the relevant building work has finished.						
6.1.1	Submission of completion certificate	1	NR	216	216		
6.1.12	Assessment of the completed works including inspections to determine whether the works have been carried out in accordance with the building regulations and are consistent with the built plans submitted (say 4 weeks of resource input)	160	Hours	144	23,040		
	Sub Total				23,256	25,000	1.36%
7.0	Other costs						
7.1	Inflationary effect of extension to development programme and start on site due to BSA Gateway 2 application						
	3% tender price inflation per annum @ 3 months @ £100m construction cost.	0.75%	%	100,000,000	750,000		
7.2	Additional finance, peak debt costs and delay in rental/ sales, etc (Excluded as subject to various factors)		Item		Excluded		
	Sub Total				750,000	750,000	40.65%
	Notional Increase in costs associated with Building Safety Act (based on £100m construction project)					1,845,000	100%
						Say 1,850,000	100%
Potential range of costs associated with Building Safety Act (%)					1.25% to 2.00% of construction cost		

Acknowledgments

The authors would like to acknowledge the contribution of **Rachel Price**, **Philip Tandy** and **Jody Wilkinson** to the development of this article and cost model. 

WITHOUT LIMITS

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James Barton

Director, Head of Cost Management,
London + South East

Edward Steiger

Project Director

From: Walsh, Rosie (Avison Young - UK) [REDACTED]
Sent: 13 August 2025 12:23
To: localplan@york.gov.uk
Subject: DIO Response to the Consultation on the Draft CIL Charging Schedule
Attachments: 2025-08-05 DIO York CIL Consultation response.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.

Dear sir / madam,

Please find attached DIO's response to the City of York Community Infrastructure Levy (CIL) Consultation.

I would be grateful if you could confirm receipt.

Please note that subject to DIO's representations on the consultation being taken into account by the Planning Inspector we will not be attending the Examination in Public on 2 September.

Kind regards,

Rosie Walsh
Graduate Planner

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Response to Draft CIL Charging Schedule modifications consultation

1. DIO Consultation Response:

- 1.1 Avison Young is instructed by the Defence Infrastructure Organisation (DIO) to respond to the Draft Community Infrastructure Levy (CIL) modifications consultation. This follows DIO responding to the proposed draft charging schedule in January 2024 (Ref: 141), on its proposed revisions to its CIL Draft Charging Schedule (DCS) for York.
- 1.2 To prepare for the submission of the DCS for examination, a fresh review of sales values and build costs has been produced, which has resulted in further modifications being proposed to the Charging Schedule. We understand that the PorterPE "City of York CIL Viability Study Addendum" published in June 2025 has informed the latest iterations to the CIL DCS.
- 1.3 DIO still has concerns about the justification behind the setting of different rates for certain residential developments. In relation to whether CIL differential rates can be set, the NPPG states the following:

"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.*

A charging authority that plans to set differential rates should seek to avoid undue complexity."

Paragraph: 022 Reference ID: 25-022-20230104; Revision date: 04 01 2023

- 1.4 We note that the modifications proposed that four strategic sites should have a CIL Charge of £100 per sqm which are:
 - ST1 – British Sugar/Manor School – 1,200 homes;
 - ST5 – York Central – 2,500 homes;
 - ST16 – Terry's Extensions Sites – 22 and 39 homes; and,
 - ST36 – Imphal Barracks – 769 homes.

- 1.5 However, the "Addendum" document includes a table showing the "*Viability of residential developments in CYC and their Epsm CIL liable floorspace headroom*" (Table A3). Whilst this table includes various typologies of sites, it only includes 2 of the strategic allocations, which are "*SS14 Terry's Extensions Sites (ST16)*", and "*SS20 Imphal Barracks (ST36)*". No other strategic allocations are included in this table, even though the Council is seeking a £100 charge per sqm for the above 4 strategic sites and zero CIL charge on the remaining allocated strategic sites.
- 1.6 In Table A3, the typology with the highest number of homes is 140 homes, on a brownfield and greenfield scenario, however, whilst Imphal Barracks and Terry's Extension site are included in the table, there is no typology or specific update relating to the other strategic sites, as the allocated capacities of these 8 sites are all above 140 units, as follows:
- ST4 – Land Adjacent to Hull Road – 263 homes;
 - ST7 – Land East of Metcalfe Lane – 845 homes;
 - ST8 – Land North of Monks Cross – 968 homes;
 - ST9 – Land North of Haxby – 735 homes;
 - ST14 – Land West of Wiggington Road – 1,438 homes;
 - ST15 – Land West of Elvington Lane – 3,339 homes;
 - ST31 – Land at Tadcaster Road – 158 homes; and,
 - ST33 – Station Road, Wheldrake – 150 homes.
- 1.7 It is therefore unclear why the other strategic sites are not included in this table, so that a comparison can be made with sites the Council consider should have a "zero CIL charge" and the 4 sites that the Council is proposing a charge of £100 per sqm. If the 8 strategic sites listed above are "viable", we would expect all these sites to have some level of 'CIL headroom' or 'viability buffer', but this information is absent from the Addendum document.
- 1.8 We therefore conclude that there is therefore a lack of justification in the Addendum document underpinning the Council's decision not to levy CIL against 8 strategic sites that are proposed for development in the Plan with a £0 CIL charge. Whilst site specific abnormal costs may render a CIL charge impracticable, there needs to be clear evidence that a greenfield site in York should have a lower CIL charge than sites in the urban area, particularly brownfield sites such as Imphal Barracks. It is important for the CIL charge to be justified in this respect and equitable across all proposed allocations. On face value brownfield sites are more likely to require CIL exemption than greenfield sites. In the absence of this information DIO considers that a zero CIL charge on all strategic sites would be a fully justified and equitable way of dealing with all Strategic sites in the DCS.
- 1.9 In addition, the NPPG sets out three scenarios by which differential rates may be appropriate, none of the three scenarios apply to the York strategic sites for we note the following:
- Geographical zones: The 4 sites proposed with a £100 sqm CIL charge are brownfield within the urban area. South and west of the York City Centre. The other strategic sites with a proposed zero CIL charge are on a mixture of within the urban area and around York on greenfield sites. For the reasons set out above, on face value brownfield sites are more likely to require CIL exemption than greenfield sites.

- Development type: A differential rate cannot apply to the strategic sites in relation to type of development as they all relate to housing use.
- Scales of development: this does not apply as for the range proposed (i.e. 22 at Terry's Extension to 2,500 at York Central) as all the other strategic sites with a proposed zero charge are within this range.

1.10 The other key consideration is that differences in rates need to be justified in relation to the viability of the development. In relation to Imphal Barracks DIO observed in the January 2024 consultation response (Ref 141) that:

"The appraisal [for Imphal Barracks] is broadly in line with our expectations, however:

- it doesn't take account of the fact that there are a number of listed buildings within the site and they together with other buildings, will need to be retained. Given the likely quality requirements in converting the heritage buildings to other uses and high value nature of the area, we are of the view that PPE should have applied a higher build cost in this instance;*
- it seems to us as though the raw build cost rates that have been included for flats and houses are potentially on the low side given the current market cost of raw materials and labour.*
- we query how PPE has arrived at the £200,000 per net ha remediation/demolition allowance for this site. As discussed above, the site is brownfield land and consideration need to be given to the listed buildings, ground conditions and is likely to require higher than usual quality finishes. There may be other as yet unidentified technical issues that DIO won't know about until much closer to the point of disposal / development. As a consequence, we would be keen to understand the rationale behind the remediation figure that PPE has used;*
- it is unclear what assumptions PPE has made in respect of the likely S106 development costs per unit and this figure may have underestimated the contributions required for services and facilities such as "the delivery of sufficient education provision to meet demand arising from the development" as required by the proposed planning policy SS20."*

1.11 The above comments on Imphal Barracks (ST36) should be considered in light of the need for CYC to be consistent and equitable in its application of the CIL Charge and a zero CIL charge for Imphal Barracks should be considered.

1.12 Given the above points DIO objects to the proposed DCS as currently drafted.

CYC approach to demolition and CIL charge reduction

1.13 DIO also requested, in its January 2024 consultation response, that CYC confirm that their approach to demolition will be in line with the CIL guidance. The guidance states that:

"The internal area of a building which is demolished during the development of a scheme can be taken into account in calculating the levy charge, in certain circumstances.

To be eligible, the parts of the buildings to be demolished must contain a part that has been in lawful use for a continuous period of at least 6 months within the 3 years ending on the day planning permission first permits development. They must also be demolished before completion of the chargeable development."

Paragraph: 103 Reference ID: 25-103-2019090; Revision date: 01 09 2019

1.14 DIO want CYC to confirm that their approach to demolition will be in line with this guidance at Imphal Barracks as there are a significant number of buildings on site that would need to be demolished to

enable development to come forward. In our view they would be capable of being able to meet this NPPG definition.

- 1.15 Whilst the precise number of homes to be demolished will be established through the development management procedures, DIO is keen to have reassurance from CYC that the total floorspace of demolished buildings will be taken into account and where appropriate deducted from the total new floorspace when any CIL calculations are being run at planning application stage.
- 1.16 DIO have set out its concerns and objections to the CIL DCS and, subject to these points being taken into account by the Inspector, do not consider it necessary to attend the examination hearing on Tuesday 2nd September 2025.

Avison Young

5 August 2025

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

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 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 £1 billion 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.

a: 9 York Place, Leeds LS1 2DS t: 0113 243 6116
a: 32 Eyre Street, Sheffield, S1 4QZ t: 0114 354 0220
w: www.idplanning.co.uk

Registered in ENGLAND No: 05271142

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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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

a: 9 York Place, Leeds LS1 2DS t: 0113 243 6116
a: 32 Eyre Street, Sheffield, S1 4QZ t: 0114 354 0220
w: www.idplanning.co.uk

Registered in ENGLAND No: 05271142

From: Karen Maddison [REDACTED]
Sent: 14 August 2025 16:07
To: localplan@york.gov.uk
Subject: University of York

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

On behalf of the University of York I confirm we will not be speaking at the CIL Public Inquiry in September 2025.

We note that our previous representations via O'Neills Planning Consultants will be submitted in full to the Independent Examiner. The representation includes the technical representation by CBRE which details concerns about viability of off campus PBSA if a CIL charge of £150perm2 is levied in addition to the affordable housing and carbon reduction charges. Potential charges on biodiversity net gain and Building Safety Act Levy will also affect viability.

The University continues to contribute extensively to the local economy both financially and culturally. This year the University is ranked 12th in the University League Tables 2026. Future student's need confidence in the housing market that they will be able to find an affordable home in York for all their years of study. Higher development costs on PBSA raise concerns that affordable rents will be impacted.

Mrs. Karen Maddison BSc(Hons) MRICS

Land & Buildings Manager

Estates Operations

Directorate of Technology, Estates and Facilities

University of York
York
YO10 5DD

[REDACTED]

[REDACTED]



Whilst I may send emails out of office working hours, there is no expectation for a reply from you outside of your preferred working hours.

Disclaimer: <https://www.york.ac.uk/about/legal-statements/email-disclaimer/>

From: Steven Roberts [REDACTED]
Sent: 15 August 2025 12:12
To: localplan@york.gov.uk
Cc: Jenny Taylor-Smith
Subject: ASDA Stores Limited - Representation on CIL Statement of Modifications - York
Attachments: ASDA Stores Limited Representation to City of York CIL Modificaitons Consultation - Aug 2025.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.

Dear Sirs,

ASDA Stores Limited ('ASDA') submits this representation (attached) in relation to the Community Infrastructure Levy (CIL) Statement of Modifications Consultation been undertaken by the City of York Council in relation to regulation 11(1) of CIL regulations 2010 to inform amendments made to the draft CIL Charging schedule as revised in January 2024.

ASDA aim to promote effective use of brownfield land through our estate to facilitate development in sustainable locations, as supported by the strategic aims of the Local Plan and the NPPF. To facilitate such development, we implore the Council to re-consider the imposition of further development costs that will expand upon existing development barriers whilst failing to recognise site-specific viability requirements. We trust that the attached comments will be taken into account.

We would welcome the opportunity for further engagement on these matters.

Kind regards

Steve

Steven Roberts MRICS MRTPI CMI
ASDA National Planning Manager
Asda House, Great Wilson Street, Leeds, LS11 5AD

Town Planning Team Email: townplanningteam@asda.uk



Data classification: Asda Internal

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

15th August 2025
[Sent via Email to localplan@york.gov.uk]

Dear Sir or Madam,

City of York Council – Representations to Community Infrastructure Levy (CIL) Statement of Modifications Consultation

Introduction

ASDA Stores Limited ('**ASDA**') submits this representation in relation to the 'CIL Statement of Modifications Consultation' being undertaken by City of York Council.

It is our understanding that the latest consultation is being undertaken in line with regulation 11(1) of the Community Infrastructure Levy Regulations 2010 to inform amendments made to the draft CIL charging schedule as revised in January 2024, and which is currently undergoing examination.

ASDA are a national grocery retailer founded in 1965 with roots in a 1920s Yorkshire family business. Our estate comprises approximately 1,200 sites UK-wide—including 610 superstores, supermarkets, and ASDA Living Stores—and employs over 140,000 colleagues serving 16 million customers weekly. We also have a growing presence in convenience and food service.

Like others in the sector, we face delivery challenges including rising construction costs, labour shortages, high interest rates, limited government funding, regulatory changes, and broader economic uncertainty. Retail-focused development also presents unique obstacles. While these representations reflect ASDA's perspective, the themes raised within are consistent with the challenges faced by other retailers and therefore require critical consideration.

Representations

Whilst we support modification no.1 which seeks to reduce the CIL rate for new residential floorspace from £200 to £150 per sq.m, and modification no.8 which reduces the rate of new convenience floorspace (up to 450sq.m GIA) from £100 per sq.m to a £nil rate, ASDA wish to submit their general objection to the proposed adoption of a CIL charging schedule within the City of York.

We oppose the adoption of CIL, on the basis of conflict with the Council's strategic aims of promoting development opportunities to cultivate economic growth (as underpinned by the York Economic Strategy 2016) and meet identified needs, as a means of consolidating York as the regional economic hub for North Yorkshire. Strategic City of York Local Plan (2025) policy DP1 clearly references a desire for York to act as an economic driver for the region.

The revised National Planning Policy Framework (NPPF) (2024) increased the weight attributed to the redevelopment of brownfield and underutilised land, recognising the value of using previously developed sites to facilitate development and meet identified needs. The NPPF at paragraph 125c now affords substantial weight to such development. The adopted Local Plan through policy SS1 acknowledges the opportunity that previously developed land can play in facilitating development in sustainable locations to meet housing need over the Plan period.

In this context, we fail to appreciate how additional costs imposed on prospective development will aid in facilitating the Council's strategic economic or development objectives, or how additional development costs align with the Ministry for Housing, Community and Local Government's (MHCLG) recognition of the value of making effective use of land through development of under utilised sites.

ASDA possesses a substantial estate across the United Kingdom, including sites within the City of York, which present opportunities to create exciting mixed-use places with new residential units, or student accommodation, supported by commercial uses serving both new occupants and the existing community. Such developments ensure that new and existing needs are met for food shopping whilst promoting the vitality of the centre's within which the sites are located and thus supporting the local economy.

One of the major development pressures at both a national and local level is the acute shortage in both housing and purpose-built student accommodation (PBSA). A recent CBRE PBSA supply and demand report cited a capacity shortfall of at least 6,500 in student accommodation provision within the City of York¹. The opportunity to bring forward mixed-use redevelopment comprising PBSA and retail convenience on well-located, previously developed sites therefore presents an opportunity to meet this growing demand and satisfy an identified need. To the contrary, the proposed imposition of a £150 per sq.m CIL charge on new PBSA floorspace, a development type typically requiring an accessible, central location, only serves to stifle developer demand for bringing forward proposals which seek to satisfy this need. ASDA cannot envisage how this approach will positively contribute to bringing an adequate supply of PBSA to market, which conflicts with the Council's strategic aims to deliver the right type and quantum of development which meets identified needs as to promote economic growth and retain York as a regional economic hub.

Beyond the proposed PBSA charge, we note the revised CIL schedule retains the provision for a charge of £150 per sq.m on residential development, albeit reduced from £200, observing that the CIL schedule proposes charges for the two most acute development pressures in the City of York. We also note that the reduction in the proposed residential CIL rate suggests the Council recognise existing viability constraints, with rising build costs cited within the Viability Study Addendum (June 2025). With due regard for the acknowledged rise in building costs, and with regards to the latest 5YHLS figure cited by the Council², and the requirement for a 20% housing need buffer, ASDA query how imposing further development costs aligns with the recognised challenges faced by developers, and how this mis-alignment aims to promote the development of a sufficient quantum of housing as to ensure that City of York are delivering against their mandatory housing targets?

Aligned to the above, we therefore suggest that the barriers to redevelopment are reduced to enable a more efficient realisation of the development potential offered by our estate, and to facilitate satisfaction of current PBSA and housing delivery undersupply with the City of York. To release the significant potential of redeveloping sites currently occupied by our, or other retailers supermarkets, it is vital that redevelopment prospects remain attractive and viable to both operators and prospective developers.

The optimisation of underutilised supermarket sites, whereby continuity of trade is a priority, creates sensitivities which can marginalise redevelopment viability given that the operator in-situ also needs to remain operationally and economically viable, outwith the potential gross development value, to be comfortable in bringing a site to market. This creates an additional benchmark and conditions to any land sale and/or developer partnership to which a prospective developer would need to carefully consider. Consequently, the scope to which redevelopment opportunities are deemed viable from both the disposal and/or developer perspective can differ vastly based on the circumstances of each site.

¹ York Student Accommodation Demand and Supply Report, CBRE, April 2024 (submitted to application 24/01077/FULM)

² Housing Land Supply Statement July 2024, City of York Council

When redeveloping our stores, we incur a range of bespoke and abnormal costs that go beyond those typically seen in residential projects. These include:

- **Fit-Out of Replacement Stores:** Includes refrigeration, shelving, checkouts, lighting, signage, and back-of-house facilities—comparable in scale and importance to residential fit-out costs.
- **Temporary Trading Arrangements:** Leasing and fitting out temporary stores or pop-ups to maintain some level of trade during redevelopment.
- **Phased Demolition and Construction:** Staged works to allow partial operation during redevelopment, increasing programme length, complexity, and cost.
- **Car Parking Reprovision:** Interim and permanent solutions to meet planning and customer needs, including temporary structures or underground parking.
- **Operational Disruption and Trading Performance Impact:** Reduced footfall, constrained access, and customer inconvenience during construction can significantly affect store performance and scheme viability.
- **Infrastructure and Servicing Upgrades:** Reconfiguration of utilities, drainage, and servicing yards to support new layouts and increased density.
- **Design and Engineering Complexity:** Structural solutions to support residential or student accommodation development above retail floors, including acoustic separation, fire safety, and vertical circulation

We advance therefore that the introduction of a flat, inflexible CIL rate fails to recognise the sensitivities of each redevelopment site, thus potentially diminishing prospects of redevelopment on prospective sites which may otherwise have been brought forward for redevelopment. ASDA again maintain that an additional cost to such development being brought forward fails to respond to the Council's identified development needs or strategic aims outlined above. A flat CIL rate does not align with the site-by-site, marginal nature of estate optimisation.

Conclusion

We aim to promote effective use of brownfield land through our estate to facilitate development in sustainable locations, as supported by the strategic aims of the Local Plan and the NPPF. To facilitate such development, we implore the Council to re-consider the imposition of further development costs that will expand upon existing development barriers whilst failing to recognise site-specific viability requirements.

We trust that the above comments will be taken into account as part of this consultation. ASDA is a keen promoter of sustainable development and seeks to ensure that strategic objectives regarding brownfield land and housing delivery, or other identified needs, are met, particularly where existing supermarket sites can facilitate that delivery.

We would be keen to discuss the above with you further and would welcome the opportunity to meet either as a business or alongside other retail operators, if you are able to provide availability of dates so we can review the representations concerning matters for retail and mixed-use space planning.

Yours sincerely,

Jenny Taylor-Smith MRTPI AIEMA

**Head of Town Planning UK
Property Team
ASDA**

From: Tim Ross [REDACTED]
Sent: 15 August 2025 14:03
To: localplan@york.gov.uk
Cc: Eamonn Keogh
Subject: RE: Representations on behalf of Helmsley Group - City of Yorks CIL statement of modifications Consultation
Attachments: CYC Revised CIL DCS Mods Consultation 2025 - Helmsley Securities Representation (CBRE 15.08.25).pdf; ylp2508.CIL reps.pdf
Follow Up Flag: Follow up
Flag Status: Completed

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Dear sir/ madam, please find the attached representations on behalf of Helmsley Group in response to the Council's CIL Statement of Modifications Consultation

Attached submission includes:

- 1) Over arching representation prepared by O'Neill Associates
- 2) Technical representation prepared by CBRE

Contact details set out below and within the submission.

Many thanks,
Tim

Tim Ross [REDACTED]
O'Neill Associates
Chartered Town Planning Consultants
[REDACTED]

www.oneill-associates.co.uk

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City of York Community Infrastructure Levy Statement of Modifications Consultation

15 August 2025

Response on behalf of Helmsley Group

INTRODUCTION

- i. These representations are submitted in response to:
 - a. the consultation on the Statement of Modifications, Revised draft CIL Charging Schedule, and City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.
 - b. they should be read in conjunction with previous representations made on behalf of Helmsley Group in response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023 and January 2024.
- ii. ***This representation is supported by and should be read in conjunction with the Technical Representation prepared by CBRE and submitted with this representation.***
- iii. ***Helmsley Group requests to be heard at the examination of the City of York's CIL Charging Schedule, as an independent stakeholder organisation, and to be notified by the Council/ programme coordinator of all future events and proceedings. The notification should be provided to Helmsley Group, CBRE and O'Neill Associates.***
- iv. The proposed £150/m² flat residential CIL rate—excluding certain strategic allocation sites—would be the highest in Yorkshire and the Humber. By contrast, other authorities adopt zone-based rates to reflect local market values:
 - Leeds: £7.55, £34.72, £67.93, or £135/m² (index-linked)
 - Sheffield: £0, £46.18, £76.97, or £123.15/m² (index-linked)
- v. York's blanket rate ignores value variation and disproportionately impacts lower-value areas, as well as sites with significant development constraints/ risk requiring costly mitigation.

- vi. The CIL charging schedule should exempt conversion and extensions to existing buildings within the city centre to promote its regeneration, viability and vitality.
- vii. The CIL charging schedule should exempt all listed buildings in recognition of the significantly higher development costs associated with their restoration and redevelopment, and to incentivise their ongoing use and safeguard their future as a heritage asset.
- viii. The Council has failed to consider the effect of the proposed CIL charging schedule of potential **Grey Belt sites**, which national policy recognises as an important source of housing land. York is likely to depend on these sites to meet both overall housing and affordable housing targets. However, many Grey Belt sites delivering family housing with high affordable content also face **substantial S106 education contributions**—driven by child yield assumptions—which can vary significantly in scale.
- ix. When these S106 obligations are combined with a £150/m² CIL rate, the result is a serious threat to scheme viability, particularly for the very developments the Local Plan seeks to promote.
- x. This runs counter to the **NPPF requirement to significantly boost housing supply**. York is already falling far short of its Local Plan housing targets after more than a decade of undersupply. A charging schedule that imposes the highest rate in the region, without sensitivity-testing realistic policy and s106 contribution scenarios, risks suppressing both market and affordable housing delivery—undermining the objectives of the adopted Local Plan and the *One City, for All* Council Plan (2023–2027).
- xi. The proposed CIL charging schedule may unintentionally discourage traditional residential development (C3 use) in favour of serviced apartments and short-term lets (C1 use) which are zero rated. This creates a financial incentive for developers to prioritise short-term rental developments over permanent housing, as C1 schemes avoid both significant CIL payments and affordable housing obligations tied to residential projects. This shift reduces the supply of permanent and affordable homes, and would exacerbate local housing shortages.

Local plan targets

- xii. The adopted Local Plan 2025 spans the period 2017/18 to 2032/33 — a 16-year framework for delivery. Policy SS1 commits York to a minimum average annual net

provision of **822 dwellings**, ensuring at least **13,152 new homes** by 2032/33. Crucially, it also requires that **at least 45%** of the city's identified need for **9,396 affordable dwellings** is met during the plan period. This equates to **4,228 affordable homes**, or an average of **264 per year**.

Housing delivery

- xiii. The Council's *Annual Housing Monitoring Update* (July 2025) shows that by the local plan's halfway point, only **5,740 dwellings** had been delivered — **836 short** of the number needed to be on track.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Table 2.9: Summary of data between 1 April 2015 to 31 March 2025

Year	Completions	New Build	Net Conversions/ COU	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain	Communal Establishments	Overall net gain in Local Plan period
2015-2016	1171	908	219	1	218	6	1121		
2016-2017	996	420	564	21	543	7	977		
2017-2018	1336	1111	195	12	183	10	1296	35	1331
2018-2019	481	299	155	18	137	5	449	2	451
2019-2020	596	437	134	11	123	11	560	67	627
2020-2021	643	469	159	14	145	6	622	21	643
2021-2022	419	350	58	18	40	6	402	258	660
2022-2023	494	411	55	1	54	7	459	392	851
2023-2024	569	390	146	3	143	8	528	-63	465
2024-2025	675	395	262	4	258	8	649	63	712
Local Plan delivery 2017-2025	5213	3862	1164	81	1083	61	4965	775	5740
10 year delivery 2015-2025	7380	5190	1947	103	1844	74	7063		

- xiv. The Council has fallen short of its local plan targets for housing delivery for many years which, as a direct result of the draft CIL Charging Schedule, is likely to worsen rather than address the existing backlog.
- xv. The proposed rate or rates would seriously undermine the deliverability of the 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.

Affordable Housing delivery

- xvi. The Council's *Annual Housing Monitoring Update* (July 2025) paints a stark picture: every year since the local plan period began, affordable housing delivery has fallen well short of the adopted local plan target. By the plan's halfway point, only **993 affordable dwellings** had been delivered — less than half of the **2,114** needed to be on track. At the current pace, York will deliver just **1,986 affordable homes** by 2032/33 — meeting only **21%** of the identified need, and missing the Local Plan's affordability commitment by a wide margin. This shortfall risks deepening the city's housing crisis, leaving thousands of residents without access to the secure, affordable homes they need.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Affordable housing completions

- 2.19 During the course of the monitoring year, 129 affordable homes were completed. Over the duration of the plan period so far (2017-2015) a total of 993 affordable dwellings have been completed.
- 2.20 The housing mix in relation to delivery over the last year and over the monitoring period mirror each other with the majority of completions shown to be 1/2 bedroom flats followed by 2/3 bedroom houses¹⁰.

Table 2.12: Affordable Housing Completions – Housing Mix

Year	1-bed flat	2-bed flat	1-bed house	2-bed house	3-bed house	4-bed house	Total
2017/18	25	32	0	6	10	1	74
2018/19	5	24	2	14	15	0	60
2019/20	31	47	5	18	16	7	124
2020/21	41	27	6	29	22	5	130
2021/22	68	57	0	40	44	10	219
2022/23	38	0	0	32	42	9	121
2023/24	11	26	0	61	33	5	136
2024/25	37	34	0	26	27	5	129
Total 2017-2025	256	247	13	226	209	42	993
% split for 2024/25	29%	26%	0	20%	21%	4	100%
% split over 2017-2025	26%	25%	1%	23%	21%	4%	100%

¹⁰ "Houses" includes a small number of bungalows.

- x. 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 and 'One City for all: Council Plan' which will be severely threatened by the introduction of the draft CIL Charging Schedule.

- xi. Grey Belt sites are likely to become vital to York's housing and affordable housing delivery, as recognised in national policy. CIL should not be set at a level that undermines their viability.
- xii. Current S106 education contributions—driven by high child yield assumptions—are highly variable (as shown in the table extract below) and, when combined with a £150/m² CIL rate, risk making family and affordable housing schemes unviable.
- xiii. The CIL evidence base must **sensitivity-test** realistic education contribution scenarios to avoid a charging schedule that inadvertently blocks the very schemes the Local Plan seeks to deliver.

Below – Extract from City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.

Table 4.13 Policy DM1/s106 costs per unit tested in this Addendum

Site	S106	Supplementary Education	Other key Infrastructure	Total cost	Cost per unit
Not Strategic Site specifics	£3,208,800	£3,112,461	£0	£6,321,261	£8,274
SS8 Land Adj Hull Road (ST4)	£886,200	£1,054,611	£1,000,000	£3,419,116	£13,000
SS9 Land East of Metcalf Lane (ST7)	£3,549,000	£9,992,240	£2,500,000	£16,041,240	£18,984
SS10 Land Nth of Monks Cross (ST8)	£4,065,600	£15,274,420	£3,000,000	£22,340,020	£23,079
SS11 Land Nth of Haxby (ST9)	£3,087,000	£12,955,738	£2,000,000	£18,042,738	£24,548
SS12 Land West of Wigginton Rd (ST14)	£5,661,600	£21,568,055	£11,900,000	£39,129,655	£29,028
SS13 Land West of Elvington Lane (ST15)	£14,023,800	£52,300,000	£74,900,000	£141,233,800	£42,295
SS14 Terry's Extension Sites (ST16)	£466,200	£0	£0	£466,200	£4,200
SS16 Land at Tadcaster Rd (ST21)	£663,600	£1,210,685	£0	£1,874,285	£11,863
SS18 Station Yard, Wheldrake (ST33)	£630,000	£1,777,059	£0	£2,407,059	£16,047
SS20 Imphal Barracks (ST36)	£3,229,800	£9,093,293	£0	£12,323,093	£16,025

Source: CYC, Key Infrastructure Requirements Updated Gantt [Exam doc: EX/CYC/70]

- xiv. The lack of sensitivity testing, particularly for potential grey belt sites is highly concerning and undermines the robustness of the evidence base to justify such a high CIL rate compared to other areas in the Yorkshire region. 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.

- xv. The reality and specific context of developing in York have not been properly considered. This is particularly pertinent within the context of a brownfield first context which is the thrust of the recent national policy statements, and the Local Plan spatial strategy. 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.
- xvi. Helmsley Group has two important schemes, that will deliver comprehensive regeneration of the Coney Street riverside area:
 - 1. 3 - 7 Coney Street York (reference: 23/00420/FUL & 23/00421/LBC) for Internal and external works to include extensions to roof to create additional storey, partial demolition of No.5 Coney Street to form connection to riverside and new shopfronts in association with redevelopment of site to create commercial, business and service floorspace, residential units and public realm space.
 - 2. Site Of 19 To 33 Coney Street York (reference: 22/02525/FULM & 22/02526/LBC) Redevelopment of 19 to 33 Coney Street, land to rear of 35 to 37 Coney Street and 39 Coney Street to 2 Spurriergate comprising conversion of retained buildings and new build elements of 3 to 5 storeys to create commercial/business/service floorspace (use class E), purpose-built student accommodation (sui generis) and public realm works including riverside walkway, landscaping and access further to partial demolition of buildings.
- xvii. Both highlight the complexity of developing within York which has significant impacts in terms of viability. Both involve the restoration and conversion of listed buildings. Securing the long-term future of York's heritage for future generations is a key objective of the local plan, and the NPPF. The draft CIL charging schedule would prevent such development because it would not be viable. Both PBSA and residential accommodation above shops makes an important contribution to housing supply but its delivery is seriously threatened by the draft CIL charging schedule.
- xviii. 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, the extremely high concentration of listed buildings, and most is high flood risk. The rest of the city commands lower values but lower development costs (typically).

- xix. Without CIL relief (e.g. 'zero' rated) for listed building and the conversion and upward extension of city centre buildings the draft CIL charging schedule threatens the restoration and long-term future of York's heritage, and comprehensive regeneration schemes in the city centre.
- xx. The adopted local plan's policy requirements for most developments, particularly major developments 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 City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.
 - 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, 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.

For example, draft local plan policy G16 seeks on-site open space provision for all residential developments, except in exceptional circumstances or for small sites. The amenity open space requirement is typically around 40.5sqm **per bedroom** depending on the level of local open space deficit (by electoral ward) – this spatial requirements is set out in the 2017 open space & GI update - https://www.york.gov.uk/downloads/file/14274/open_space_and_green_infrastructure_update_2017.

Cumulatively, the requirement for 40.5sqm per bedroom has significant implications for the viability of proposals, particularly large city centre schemes. A significant proportion of land within a development site would have to be given over to open space. This requirement does not seem to have been properly considered as part of the Council's draft CIL charging schedule evidence.

END

City of York CIL Statement of Modifications Consultation

Technical representation prepared by CBRE UK Ltd on behalf of:

Helmsley Securities Ltd

August 2025

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Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by Helmsley Securities Ltd ('Helmsley Securities'), which has 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') Statement of Modifications ('SoM') consultation ('the consultation').
2. CBRE's technical representations focus upon the evidence base underpinning the CYC CIL DCS Proposed Modifications – specifically the City of York CIL Viability Study Addendum ('CIL Viability Addendum') produced by Porter Planning Economics ('PPE') and dated June 2025.
3. An overarching representation has been prepared by York-based town planning consultancy O'Neill Associates.

The Consultation

4. CYC has published the following documents:
 - Draft CIL Charging Schedule (June 2025)
 - Statement of Modifications (June 2025)
 - Notice of Submission (June 2025)
 - Consultation Statement (June 2025)
 - CIL Consultation Spring 2023 Representations
 - CIL Consultation Winter 2023 Representations
 - CIL Viability Assessment Update (June 2025)
 - CIL Sensitivity Test Viability Report (November 2023)
 - CIL Sensitivity Test Viability Report Errata Addendum (December 2023)
 - CIL Viability Assessment Study (December 2022)
 - CIL Infrastructure Funding Gap Assessment (July 2025)
 - Local Plan Infrastructure Delivery Plan (July 2025)
5. The CIL DCS SoM consultation ran to 15 August 2025.
6. Independent examination of the CIL DCS is scheduled for Tuesday 2nd September 2025, following the close of the CIL DCS consultation.

Prior Representations

CBRE was previously instructed by Helmsley Securities to prepare representations on the previous CIL Viability Study evidence base produced by PPE on behalf of CYC, as published as part of the CYC CIL DCS Spring and Winter 2023 consultations.

The previous representations highlighted technical issues with the evidence base, which undermined the validity of this to inform CYC's proposed CIL charging regime.

Many issues remain unresolved in CYC's latest published evidence base.

In summary, CBRE's previous representations identified the following issues:

- Illogical timing of implementation of CIL during a period of economic deterioration and challenge.
- Outdated evidence, in particular relying on unrealistically low construction costs that fail to reflect the recent inflationary environment.
- Absence of testing for the conversion of existing non-residential floorspace for residential use (e.g. upper floors in existing premises, which are prevalent in York).
- Unduly simplistic core/non-core residential pricing approach.
- Lack of evidence in supporting proposed Benchmark Land Values ('BLV').
- Lack of transparency by not providing corresponding viability appraisals for stakeholders to analyse.

CYC and PPE have provided a formal set of responses to the CIL Viability Study consultation representations within the 'CIL Consultation Statement'. This provides a summary of the main issues raised in both the Spring 2023 and Winter 2023 consultation and outlines CYC's response.

However, these responses lack robust justification and do not suitably detail why the issues raised within the representations have not been addressed within the CIL Viability Addendum.

As such, within this representation, CBRE has referred to and provided responses back to PPE's and CYC's responses set out within the CIL Consultation Statement and CIL Viability Assessment Update.

Helmsley Securities' Background

7. Helmsley Securities is a long-standing investor and developer in York, working across a variety of property sectors. Helmsley Securities intends to bring forward a major redevelopment scheme in York city centre and has a resolution to grant planning application (ref: 22/02525/FULM) for the redevelopment of land and premises at Coney Street, York.
8. This proposed development scheme comprises the provision of high-quality Purpose Built Student Accommodation ('PBSA') containing 358 no. rooms with generous communal amenity space including a shared lounge on each floor, cinema room, gym, yoga studio, quiet study rooms and café space.
9. The proposal will also deliver a new riverside public square providing flexible space for events and public riverside walkway with restaurants featuring outdoor seating. Retail space will also be provided offering a range of unit sizes supporting both independent retailers and large high street names. This will include provision of new retail frontages along a new route to the riverside from Coney Street and improved shop fronts on Coney Street.
10. In December 2024, Helmsley Securities had another planning application approved at 3 - 7 Coney Street York (ref: 23/00420/FUL & 23/00421/LBC) for Internal and external works to include extensions to the roof to create an additional storey, partial demolition of No.5 Coney Street to form connection to riverside and new shopfronts in association with redevelopment of site to create commercial, business and service floorspace, residential units and public realm space.
11. The latter proposal will convert empty space in listed buildings to residential use, and will create an upward extension to gently increase density and optimise the efficient use of the properties in the city. However, this form of development is costly, and will not gain relief from CIL.
12. CYC should give consideration to exempting conversion and upward extension to existing buildings within the city centre from CIL (by applying a £NIL rate) to promote its regeneration, viability, and vitality, and to

exempting all listed buildings from CIL (by applying a £NIL rate) in recognition of the significantly higher development costs associated with their restoration and redevelopment, incentivising their return to use and safeguarding the future of such heritage assets.

Helmsley Securities' Stance

13. Helmsley Securities has fundamental concerns regarding:
 - a. CYC's proposal to introduce CIL charging on residential dwellings within the City of York in the Revised CIL DCS.
 - b. The absence of CIL relief from CYC's proposed CIL charging on residential dwellings for conversion developments, particularly listed buildings.
14. It is Helmsley Securities' 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.
15. In light of above Helmsley Securities does not accept the validity and reliability of the published viability evidence base upon which the proposed residential charging rates within the Revised CIL DCS relies, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.
16. On this basis, Helmsley Securities cannot agree with CYC that there is an appropriately evidenced and legally compliant basis upon which the Revised 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.
17. Should CYC determine not to rectify the issues identified in this representation and O'Neill Associates overarching representation, Helmsley Securities 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

18. 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.
19. This constitutes Helmsley Securities formal request to be heard at the examination of the CIL DCS, as an 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

20. This section of the document sets out the matters of representation that Helmsley Securities 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 Revised CIL DCS Rates

21. The Revised CIL DCS proposes a significant increase in the costs on development via the introduction of CIL charging on multiple uses for the first time.
22. Notably, the Revised CIL DCS introduces a revised residential CIL rate, and the reinstatement of strategic sites ST1 and ST5:

Modifications are represented as new text in **yellow highlighted bold text (December 2023 modifications)** and **blue highlighted bold text (July 2025 modifications)**

Development type		CIL rate per sqm	Modification Proposed Explanation
Residential dwellings within the City of York		£150	Amend the CIL rate to £200 from £150 to reflect revised viability.
Residential dwellings within the City of York Local Plan strategic sites ST4 , ST7, ST8, ST9, ST14, ST15, ST31 and ST33		£0	To include ST4, ST31 & ST33 as £0 to reflect revised viability.
Residential dwellings within the City of York Local Plan strategic sites ST1, ST5, ST16 and ST36		£100	No change to CIL rate. ST1 and ST5 have been reinstated in this section rectifying an omission from the December 2023 modifications.
Sheltered/ Retirement accommodation		£0	All sheltered/ retirement accommodation now proposed to be £0 rated to reflect revised viability.
Extra care accommodation		£0	All extra care accommodation now proposed to be £0 rated to reflect revised viability.
Purpose Built Student Accommodation	Off Campus	£150	Removed original categories. New split categories to differentiate geographically between on and off campus purpose built student accommodation to reflect revised viability.
	On Campus	£0	
Convenience ¹ retail with up to 450 sqm gross internal area		£0	Amend the CIL rate to £0 from £100 to reflect revised viability.
Comparison ² retail built outside the City Centre boundary		£0	Amend the CIL rate to £0 from £100 to reflect revised viability.
Comparison retail built inside of the City Centre boundary		£0	No change proposed
All other development		£0	No change proposed

¹ Convenience retail provides lower value good purchased regularly to meet day to day needs such as food, newspapers, petrol etc.

² Comparison retail provides higher value goods purchased less often, such as household items, electrical goods, clothes, shoes etc

23. These are not incremental changes, but rather represent a fundamental shift to introduce substantial rates of CIL charging across multiple uses on both a city-wide and a zonal basis.
24. 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

25. Due to the challenging economic backdrop, only Calderdale Council has pursued the adoption or revision of a CIL charging schedule in Yorkshire and Humber, since Harrogate adopted their CIL Charging Schedule in July 2020.
26. CBRE is aware that other Local Authorities such as Birmingham City Council has halted proposals to formally review their CIL Charging Schedule over this period due to the challenging economic and property market context. CYC's proposition to introduce high charging rates for the first time is contradictory to decisions being made by other major regional cities and district authorities across the North and Midlands.
27. As a result, such proposals by CYC must necessitate comprehensive, robust, and up-to-date available evidence of financial viability to provide appropriate justification that they will strike an appropriate balance in accordance with Regulation 14(1) of the CIL Regulations (as amended).
28. Further reference to the illogical timing of CYC's decision to introduce a CIL charging regime is set out in the following sub section.

Illogical Timing

29. As noted by CBRE in previous representations, the UK property market is experiencing a prolonged and highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally since 2022. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Whilst the Bank of England base rate has contracted steadily under the current Labour government, development and investment across a wide range of sectors continue to face headwinds, which commenced in mid-2022 and are expected to prevail into early 2025.
30. Specifically:
 - a. The UK economy remains challenged with numerous headwinds. Most notably, inflation remains elevated, driven primarily by regulated gas price increases. As at June 2026, CPI was 4.1% and had remained in excess of the Government's target of 2% since 2021. This inflation has contributed to falling real household incomes throughout 2025.
 - b. Labour markets have also softened as nominal and real wage growth have slowed, and business taxation has increased. CBRE estimates that unemployment has increased 30bps to 4.7% since the Autumn Budget, and forecast the labour market to continue loosening through the remainder of 2025.
 - c. Global uncertainty and risks, driven by continued conflict in Ukraine and the Middle East coupled with U.S. Trade Policy, have stunted activity across the global economy. Despite the UK reaching a trade deal with the U.S., there remains a 10% tariff on most goods and 25% on exports of steel and

¹ Note: this information was obtained from Planning Resource and is understood to have been correct as at August 2025. The rates presented are not indexed, but represent those rates either proposed (latest) or at the date of adoption of relevant Charging Schedules.

aluminium. The ongoing geopolitical conflicts and potential escalation remains a threat to energy markets and medium-term price stability.

- d. For businesses, the prolonged period of high inflation and instability will continue to erode profit margins, reduce investment, and dampen activity. The increase in taxation via employer national insurance announced in the Spring Statement has placed further pressure on businesses.
- e. The consumer sector also remains volatile, showing month-to-month swings and remaining persistently negative. The GfK Consumer Confidence Index moved down to -19 in July 2025 from a six-month high of -18 in June, as household caution grows amid rising concerns over taxes and inflation.

31. Specifically, CBRE's baseline forecast for the residential market in 2025 is as follows:

- a. The residential sales market has gradually improved as mortgage rates have fallen, however volatile consumer confidence threatens to hinder this in the context of uncertainty looking forward to the Autumn Statement.
- b. Investment in the living sector in H1 2025 was 30% below the same period of 2024 and CBRE forecast this to be 7% lower for the year than 2024.
- c. A supply and demand imbalance persists, as new regulations have driven some landlords out. Persistent high and increasing construction costs, high debt costs, planning delays, new building safety regulations and associated delays are all contributing to challenges for residential developers.
- d. The anticipated introduction of Future Homes Standard and the Building Safety Levy in 2026 will add further cost burden upon residential developers, placing greater pressure on profit margins and compounding viability challenges.
- e. The inflationary climate coupled with macro-economic and geo-political instability and rising interest rates, has resulted in a softening of residential investment yields since 2023. This has stabilised during 2024 and 2025, but conditions remain challenging and subdued. The liquidity pool of investors seeking forward funding opportunities for Build-to-Rent assets is shallow and, due to the resultant viability constraints, there are few transactions occurring in this challenging market.
- f. In the context of this challenging backdrop, developers across the UK are relying upon grant funding to help support deliverability of residential schemes.

32. Against this backdrop, CBRE still 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. CYC's proposals to increase the cost burden on development at this point will exacerbate uncertainty and slow or stall development and regeneration plans for residential development on sites across the city.

33. Under Section 5 of the CIL Consultation Statement, CYC & PPE address these concerns, stating that *"we acknowledge that markets do fluctuate over time, and even monthly, as they will after CIL is adopted, but it would be impractical to re-run the appraisals every month."* CYC & PPE state that *"instead, in setting the CIL rates, we have allowed for a significant buffer to accommodate such fluctuations."*

34. CBRE consider that CYC and PPE's response misses the point. Markets are in a prolonged challenging period. Any material upswing will likely take years, not months. The addition of a CIL regime will compound this and prolong the impact in York, deterring investment.

35. CBRE's critique of PPE's adopted viability buffer is provided within the 'Results & Re-Appraisal' sub-section of this representation.

Outdated Evidence

36. The published available evidence to inform the Revised CIL DCS is the CIL Viability Addendum produced by PPE dated June 2025. CBRE has reviewed the CIL Viability Addendum in detail.
37. PPE confirm, in paragraph 2, that the Viability Addendum *"sets out the evidence and summarises an update in sales values and build costs for new residential dwellings and student accommodations in the City of York at the current time, and their retested viability results based on the updated assumptions."*
38. PPE also confirm that *"all other viability assumptions that were tested in the City of York CIL Viability Study (Dec'22) and updated in the City of York CIL Viability Study Addendum (Nov'23) remain the same."*
39. This indicates that, of the information and assumptions underpinning PPE's viability assessment (as at June 2025), only sales values and build costs reflect up-to-date estimates. Therefore, PPE's Viability Addendum relies partly upon data dating as far back as December 2022.
40. As set out above, and well-documented, there 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.
41. Furthermore, there are a number of assumptions critiqued by CBRE in previous representations which have not been appropriately addressed or updated by PPE, and therefore, remain consistent with PPE's previous viability assessments. Notably, these are:
- a. **Garages:** The Viability Addendum includes a single garage cost of £9,000, which is maintained throughout both the CIL Viability Assessment Study (December 2022) and CIL Viability Addendum (November 2023). Under Section 5 of CDS4 'CIL Consultation Statement' (July 2025) PPE state that *"CBRE's technical note provides no evidence for us to check and/or challenge their opinion, and we consider that we have set an appropriate allowance for this strategic study in terms of separate garage spaces that may appear only on a minority of sites."* CBRE note that PPE's assumption has not been substantiated by evidence and the technical deficiencies of this are addressed within 'Technical Deficiencies' sub-section of this representation. Nonetheless, PPE's adopted rate of £9,000 per single garage is reflective of assessment of cost as at Q4 2022 and therefore does not account for the significant cost inflation that has occurred in the intervening period. These costs are, therefore, unreflective of those currently facing developers and risk overstating the viability of residential developments and associated headroom to accommodate a CIL charge.
 - b. **Demolition and land remediation:** The Viability Addendum does not provide a re-assessment of demolition and land remediation costs. Within the CIL Consultation Statement, PPE state that *"we therefore applied a widely used by the Homes England ready reckoner and have allowed inflationary increases."* As previously highlighted by CBRE, this remains reliant upon guidance dated 2015, which was withdrawn in 2022. It remains unstated and hence unclear how these costs have been calculated and what constitutes PPE's allowance for 'inflationary increases' and whether these have been allowed up to present day.
 - c. **M4(2), M4(3)(A), M4(3)(B):** Within CBRE's representation to the Winter 2023 Consultation, CBRE highlighted that the costs associated with accessibility and adaptability requirements were based upon a historic EC Harris report, dated 2014. CBRE requested that these rates should be indexed to present day to fully account for the impact of inflation. CYC & PPE acknowledge this point under Section 3 of the Consultation Statement, but it is not clear whether this has been reflected within

PPE's updated viability testing. Therefore, it appears that PPE's assessment remains reliant upon cost evidence which is more than 10 years dated, which risks overstating the viability of residential developments and associated headroom to accommodate a CIL charge.

42. In addition, New Fire Safety (England) Regulations 2022 came into force on 23 January 2023 and under the new Regulations, a responsible person (usually a managing agent or similar) is required to provide information and carry out checks on fire safety for all buildings over 11m (or 5 storey) which contain at least two domestic premises.
43. In accordance with Approved Document B, there is also a requirement for firefighting lifts in buildings to offer additional protection and controls that enable it to be used by the fire and rescue service when fighting a fire. This is a requirement when the lift needs to travel more than 18m above or 10m below the fire service vehicle access level. The firefighting lift must have a secondary back-up power supply to ensure it continues to operate in the event of power failure in the building, a lift control system and a lift communication system.
44. The recent amendments to Approved Document B also introduces requirements for all new buildings of 30m (circa 10 storeys) or above from September 2026 to include a second separated staircase.
45. Developers and investors are factoring 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."
46. 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."
47. 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).
48. As previously critiqued by CBRE, in spite of recent confirmation and clarification relating to this requirement, it does not appear that the CIL Viability Addendum has accounted for the this or addressed the implication.

49. Furthermore, following technical consultation in 2024, the Government has announced the introduction of the Building Safety Levy², which introduces an additional charge on all new residential dwellings and purpose-built student accommodation (excluding affordable housing), following a methodology broadly consistent with CIL. Draft regulations ('The Building Safety Levy (England) Regulations 2025') were laid in Parliament on 10 July 2025, and whilst these remain subject to parliamentary approval, the Government has announced that the levy will come into operation on 1 October 2026. The confirmed levy rates for York are as follows:

- Previously Developed Land: £15.81/m²
- Non-Previously Developed Land: £31.61/ft²

50. Whilst development on brownfield land benefits from a 50% discounted rate, this nevertheless reflects an additional and non-negotiable capital cost to new development schemes with a negative impact on development viability, which should be considered within the CIL setting process.

51. Within paragraph 3 of the CIL Viability Addendum, PPE acknowledge the potential impact of the Building Safety Levy on viability headroom.

52. However, PPE simply state that *"these proposed regulatory changes will require secondary legislation, which we understand is planned for the end of 2025. These changes are therefore not yet considered certain and will not impact development viability at this current time."*

53. Considering the Government's intention is to introduce this charge from October 2026, with the BSL payment due prior to practical completion, CBRE considers it highly likely that this would impact development viability for a number of site typologies assessed.

54. It is also unrealistic to assume that CYC will review its CIL Charging Schedule in circa 12 months. Hence, the BSL will almost immediately act as a supplementary cost to CIL on development, which is not yet accounted for within the viability testing or the buffer allowance provided by PPE (as this buffer pre-dated the Government announcement of the BSL).

55. It is, therefore, recommended that:

- a. the published costs associated with BSL are incorporated with the viability assessment and/or sensitivity tested as a minimum to determine the impact on viability and CIL 'headroom'; or
- b. an alternative option would be to simply introduce a reduction in the proposed CIL rates commensurate to the additional cost of the BSL (on a £/m² basis), hence allowing an 'equivalence buffer'. It would be straightforward for the Inspector to recommend such a modification to the CIL DCS.

² <https://www.gov.uk/guidance/building-safety-levy-guidance>

Lack of Transparency

56. There is a lack of transparency in the CIL Viability Addendum 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 Guidance³ and RICS Professional Standards⁴, and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.
57. The CIL Viability Addendum does not provide corresponding appraisals and cashflows to evidence PPE's revised advice.
58. Without appraisals, it is not clear which assumptions have been adopted, maintained, or updated since the previous CIL Viability Addendum (November 2023). Furthermore, without associated cashflows, stakeholders are unable to see stabilisation and exit periods corresponding to gross development value ('GDV'), monthly apportionment of construction and other costs and finance roll-up.
59. This means the actual viability testing evidence utilised to set proposed CIL rates is not published in its entirety, not available to the examination (i.e. Inspector or stakeholders), and cannot be interrogated appropriately.
60. As CYC's evidence has been produced by a professional 'expert' ('PPE'), then the principles applying to the role of an expert in civil litigation should apply equally to a CIL examination. In *The Ikarian Reefer* [1993] F.S.R. 563 Cresswell J confirmed (p.565-566) that an expert must make available the evidence that has informed their opinion with that data to be shared upon publication of the relevant reporting. This principle should also apply to the preparation of evidence to inform a CIL examination, and yet CYC and PPE has not provided the viability testing/appraisal evidence.
61. The Courts have also held that it is a basic requirement of a consultation, if it is to be fair and useful, for respondents to be given access to the evidence that has informed the consultation proposals such that stakeholders can understand why the consulting body has reached the decisions made, and in turn to examine the evidence and judgements arising. Withholding such evidence in the process of examining the CIL Draft Charging Schedule prevents stakeholders from undertaking this basic activity and hence undermines the effectiveness and fairness of the process. It follows that the Inspector will also be deprived of the ability to interrogate the evidence in the process of examination.
62. Should the Inspector move to recommend adoption of the Revised CIL Draft Charging Schedule, given the above failings, the subsequent adoption would present a risk of being found to have been unlawful having arisen from a consultation and examination process that is procedurally flawed.

³ RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note

⁴ RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition

Technical Deficiencies

Residential

63. There are a range of detailed technical issues identified, which render the CIL Viability Addendum as an unsound basis for setting the proposed CIL rates for residential development, and which Helmsley Securities advocate will require rectification prior to CYC proceeding with the Revised CIL DCS as presently published:
- a. **City Centre Development:** CBRE previously noted the unique characteristics of York City Centre as an archaeological area of importance, situated within the historic core conservation area, and suffering from widespread high flood risk, all of which constrain development and introduce additional costs. Under Section 5 of the CIL Consultation Statement, CYC & PPE state that *“a precise cost for archaeological allowance has not been included”* and reference allowances made for brownfield site clearance and remediation costs, professional fees, and contingency. CBRE has addressed these assumptions independently and do not consider these to adequately account for the elevated costs of development in the city centre, in comparison to the rest of the city.
 - b. **Repurposing Existing Floorspace:** CBRE has previously highlighted CYC’s longstanding ambition to see the City make better use of the spaces it has, notably conversion of upper floor retail space, which is generally redundant, into residential use. CYC’s ‘Our City Centre Vision’ (previously ‘My City Centre Vision’) explicitly sets out the objective to *“encourage re-use of the under-used upper floors of buildings through planning support and business rates approach”*. P.23 of the document also states: *“Floors above commercial units are significantly underused, dominated by storage for retail units and empty space. Introducing different and mixed uses to the centre will allow more of this space to be actively used, but conversions of these buildings are complex.”*
 - c. As the ‘My City Centre Vision’ document notes, conversion of these buildings are complex for a myriad of reasons. Some of the most notable being: planning challenges around bins / bikes / noise, City Centre access restrictions, achieving sound attenuation between commercial and residential uses and working in buildings of which a significant proportion are listed and all within a conservation area.
 - d. As outlined in paragraphs 7 – 12 of this representation, Helmsley Securities is an advocate of promoting residential development above retail with numerous projects delivered in the city, running through planning or in the pipeline. These projects illustrate the complexity of development within York, when involving the restoration and conversion of listed buildings and heritage assets.
 - e. Whilst development costs associated with conversion schemes are typically lower than new-build developments, there are additional costs associated with the difficulties of these projects. Moreover, policy requirements, notably those relating to sustainability, are likely to be more challenging and costly to meet when working with heritage assets. In addition, conversion developments would typically command lower values in comparison to new-build developments. This reflects a unique typology which cannot be accurately captured under PPE’s assessment of brownfield typologies and is, therefore, not reflected in the CIL Viability Study Addendum.
 - f. Upper floors for conversion represent an important part of the housing supply for the City going forward, particularly at this time when York, along with many City Centre retail destinations are going through a period of significant change given the ongoing effect that online shopping has had on physical retail offerings and the decline in large format retail generally. Furthermore, these conversion projects help secure the long-term future of York’s heritage assets, meeting a key objective of the Local Plan and the NPPF.

- g. It is not appropriate for CYC or PPE to infer that the in-use credit would be appropriate, as this would necessitate floorspace having been utilised for six continuous months in the three years prior to a planning permission being granted. Many such buildings and upper floor spaces are redundant and will have been empty for considerable periods, meaning they will not qualify from in-use credit from CIL liability.
- h. If upper floor residential conversions are to be encouraged to meet the undersupply of residential property in the City, this approach should be explicitly tested within the CIL evidence basis, fully accounting for the specific challenges of this development typology or should be excluded altogether from CIL liability (i.e. £0 rated).
- i. **Grey Belt Sites:** In December 2024, under the Labour Government's revision of the NPPF, the concept of 'grey belt' land was formally introduced to define land in the Green Belt comprising previously developed land and/or any other land which does not strongly contribute to the following purposes of the Green Belt:
 - i. To check the unrestricted sprawl of large built-up areas;
 - ii. To prevent neighbouring towns merging into one another;
 - iii. To preserve the setting and special character of historic towns;
- j. Paragraphs 156-157 of the NPPF set out the 'Golden Rules' for residential development in the Green Belt. In relation to affordable housing, this requires the provision of:
 - i. Affordable housing which reflects either development plan policies produced in accordance with paragraphs 67-68 of the NPPF; or until such policies are in place, the policy set out in paragraph 157 of the NPPF.
- k. It is CBRE's understanding that, whilst the adopted York Local Plan does adopt differential affordable housing requirements for brownfield and greenfield developments, this was not produced in the context of, and therefore does not satisfy the requirements of, paragraphs 67-68. Therefore, affordable housing provision on Grey Belt sites in York must default to the policy set out in paragraph 157 as follows:
 - i. 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.
- l. In the context of supply side constraints in the housing market in York, Grey Belt sites will be increasingly important in supporting housing delivery going forward. Based on the affordable housing requirements of Policy H10 of the adopted York Local Plan, and in accordance with paragraph 157 of the NPPF, Grey Belt sites in York will be subject to affordable housing requirements of 35%-45%. This has significant negative implications on development viability which has not been appropriately assessed as a specific typology within the CIL Viability Addendum. CBRE requests that this assessment is undertaken by PPE.
- m. **Residential Values:**
 - i. **Geographical Pricing:** CBRE previously critiqued the use of a fixed average sales values across both York city centre and areas outside the city 'core'. Within Section 5 of the CIL Consultation Statement, CYC & PPE state *"we understand that there will be variance at the lowest level given the proximity of schools, parks and other factors that drive differences in prices, but our understanding from our consultations informing the viability testing is that prices do not vary so much that this would require different value area zones across York."*

- ii. CYC & PPE reference the sales evidence provided within Appendix A1 of the CIL Viability Addendum, stating that *“the data indicates that over half (54%) of the transactions are within $\pm£500$ psm of the average figure of $\pounds 3,792$. 72% are within when the sample is extended to $\pm£750$ psm”* and therefore claim that *“such differences are unlikely to be of significance given the considerable headroom identified and the excess of a buffer that is used when setting the proposed CIL rates.”*
- iii. CBRE would argue that a difference in average value of $\pounds 500/\text{m}^2$ ($\pounds 47/\text{ft}^2$) to $\pounds 750/\text{m}^2$ ($\pounds 70/\text{ft}^2$) is not insignificant and could translate to significant viability impacts, likely eroding the entire identified CIL ‘headroom’ in most cases.
- iv. Without access to the supporting appraisals, it is not possible to determine the potential viability impact of more granular geographical pricing and CBRE requests that this sensitivity analysis is undertaken by PPE.

n. **Construction Costs:**

- i. **Flatted / Apartment Costs:** The CIL Viability Addendum adopts the RICS BCIS (median) midpoint rate between flats 1-2 storey and flats 3-5 storey over a 15-year (default) period at a cost of $\pounds 1,631/\text{m}^2$ ($\pounds 152/\text{ft}^2$) as at Q1 2025 for the construction of apartments across York. This reflects a 3.2% increase on construction costs adopted for the CIL Viability Addendum at Q2 2023. However, CBRE is of the opinion that this does not go far enough in fully reflecting inflation of construction costs during this period.
- ii. 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 the cost rate adopted within the viability modelling. It will substantially overstate the financial viability of flatted apartment development typologies.
- iii. CBRE has reviewed the latest RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, which represents a more up-to-date sample of tendered costs. On this basis, the RICS (median) midpoint rate between flats 1-2 storey and flats 3-5 storey equates to $\pounds 1,885/\text{m}^2$ ($\pounds 172/\text{ft}^2$), which is an increase of 13% from PPE’s adopted rate. This supports CBRE’s view that the sample relied upon by PPE is overstating the financial viability of apartment developments within their assessment. The data is provided within **Enclosure 2**.
- iv. Furthermore, in the context of the unique characteristics of the City as an area of archaeological importance, within a historic core conservation area with a high concentration of listed buildings, and a vast high flood risk area, CBRE is of the opinion that the RICS BCIS Median rate underestimates the cost of development in the city centre. CBRE would advocate that the RICS BCIS upper quartile rate should represent the minimum base construction cost for generic viability testing developer-led residential typologies. On the basis of the RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, a midpoint between the lower quartile rates for flats 1-2 storey and flats 3-5 storey equates to $\pounds 2,222/\text{m}^2$ ($\pounds 206/\text{ft}^2$), which is an increase of 36% from PPE’s adopted rate.
- v. **House Costs:** The CIL Viability Addendum adopts the RICS BCIS Estate Housing – Generally (median) rate of $\pounds 1,441/\text{m}^2$ ($\pounds 134/\text{ft}^2$) for medium housebuilders (4-49 units) and the Estate Housing – Generally (lower quartile) rate of $\pounds 1,274/\text{m}^2$ ($\pounds 118/\text{ft}^2$) for large housebuilders (50+ units).

- vi. CBRE has also cross-checked these rates against the latest RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, which represents a more up-to-date sample of tendered costs. On this basis, the Estate Housing – Generally (median) rate equates to £1,643/m² (£153/ft²) and the Estate Housing – Generally (lower quartile) rate equates to £1,380/m² (£128/ft²).
- vii. This indicates that the cost rates adopted within the viability modelling for houses is also unrealistically low, skewed by tenders which are no longer reflective of costs currently facing housebuilders. As such, the sample relied upon by PPE is overstating the financial viability of housing developments within their assessment.
- o. **Garages:** As discussed within paragraph 38a of this representation, The CIL Viability Addendum maintains a single garage cost of £9,000/unit. As previously highlighted by CBRE, the latest information provided to CBRE by housebuilders places the current cost at approximately £15,000 per single garage in 2025. Evidence of this from Yorkshire and the North West of England, indexed to Q3 2025⁵, is summarised in Table 1 below.

Table 1: CBRE Garage Cost Benchmarking

Site	Region	Cost Date	Avg Cost (excl. Abnormals)	Indexed Avg Cost (excl. Abnormals)
Site A	Yorkshire and the Humber	Jan-25	£14,164	£14,306
Site B	North Yorkshire	Jan-25	£15,180	£15,333
Site C	North West	Jul-25	£14,331	£14,331
Average			£14,559	£14,657

Source: CBRE

- i. As a result, the cost allowance in the CIL Viability Study Addendum is considered unreasonably low and not reflective of the construction costs facing housebuilders in the current market.
- p. **Other development costs:**
 - i. **Contingency:** The contingency rate adopted within the CIL Viability Addendum is maintained at 4.00%. CBRE previously highlighted the elevated risk associated with the redevelopment of brownfield sites, particularly in York where constraints are multiple. Under Section 5 of the CIL Consultation Statement, CYC & PPE respond to this, stating “*in line with PPG Viability, it is not necessary to include a contingency rate within high level viability studies such as this.*” This fails to address the concerns raised by CBRE in previous representations.

⁵ Indexed using BCIS All-in TPI

- ii. CBRE is aware of several recent evidence from Local Plan viability studies which adopt a contingency allowance of 5%. These are as follows:
 - a. Within the Oadby & Wigston Borough Council Community Infrastructure Levy Viability Study Stakeholder Workshop (June 2025), Aspinall Verdi adopted contingency at 5.0% for brownfield sites.
 - b. Additionally, within the Charnwood Borough Council Community Infrastructure Levy - Viability Study Stakeholder Workshop (May 2025), Aspinall Verdi adopted contingency at 5.0% for brownfield sites.
 - c. Birmingham City Council Birmingham Whole Plan Viability Assessment prepared by Aspinall Verdi in April 2024 adopts a contingency at 5.0% for brownfield sites.
 - d. Amber Valley Borough Council Local Plan Viability Assessment also prepared by Aspinall Verdi in February 2024 adopts a contingency at 5.0% for brownfield sites.
 - e. Durham County Council Local Plan Viability Testing Update prepared by CP Viability in October 2023 adopts a 5.0% contingency allowance for brownfield sites.
 - f. Ashfield District Council Whole Plan Viability Assessment prepared by NCS in March 2023 incorporates an allowance of 5.0% contingency with no differentiation between greenfield and brownfield sites.
- iii. Within Yorkshire specifically, the latest CIL viability evidence produced relates to the Calderdale Council DCS, produced by Aspinall Verdi in June 2023. Aspinall Verdi adopt a 5% contingency allowance for brownfield sites.
- iv. On this basis, there is clear evidence of consensus amongst professionals that 5% represents a reasonable contingency allowance for development of brownfield sites within the current market.
- v. Furthermore, CBRE notes that within the viability review of Helmsley Securities' application at 19 to 33 Coney Street (Ref: 22/02525/FULM), CYC's independent advisor, Stannybrook Property Consultants, accepted that a 5% contingency allowance was reasonable. This is a brownfield site within the City Centre, involving complex conversion of existing heritage assets. This indicates that CYC deem a 5% contingency allowance to be reasonable in site-specific circumstances on brownfield sites in York, and CBRE therefore questions why a reduced rate is advocated within this area wide assessment.
- vi. As such, CBRE maintains that the contingency rate for brownfield sites should be adjusted upwards from 4.00% to 5.00% to reflect an adequate allowance for contractor's and developer's risk.
- q. **Section 106 costs:**
 - i. The CIL Viability Addendum maintains the policy costs and Section 106 obligations assumed within the CIL Viability Study. These are extracted below for reference.

Table 4.13 Policy DM1/s106 costs per unit tested in this Addendum

Site	S106	Supplementary Education	Other key Infrastructure	Total cost	Cost per unit
Not Strategic Site specifics	£3,208,800	£3,112,461	£0	£6,321,261	£8,274
SS8 Land Adj Hull Road (ST4)	£886,200	£1,054,611	£1,000,000	£3,419,116	£13,000
SS9 Land East of Metcalf Lane (ST7)	£3,549,000	£9,992,240	£2,500,000	£16,041,240	£18,984
SS10 Land Nth of Monks Cross (ST8)	£4,065,600	£15,274,420	£3,000,000	£22,340,020	£23,079
SS11 Land Nth of Haxby (ST9)	£3,087,000	£12,955,738	£2,000,000	£18,042,738	£24,548
SS12 Land West of Wigginton Rd (ST14)	£5,661,600	£21,568,055	£11,900,000	£39,129,655	£29,028
SS13 Land West of Elvington Lane (ST15)	£14,023,800	£52,300,000	£74,900,000	£141,233,800	£42,295
SS14 Terry's Extension Sites (ST16)	£466,200	£0	£0	£466,200	£4,200
SS16 Land at Tadcaster Rd (ST21)	£663,600	£1,210,685	£0	£1,874,285	£11,863
SS18 Station Yard, Wheldrake (ST33)	£630,000	£1,777,059	£0	£2,407,059	£16,047
SS20 Imphal Barracks (ST36)	£3,229,800	£9,093,293	£0	£12,323,093	£16,025

Source: CYC, Key Infrastructure Requirements Updated Gantt [Exam doc: EX/CYC/70]

- ii. This demonstrates a total cost per unit ranging from £11,863 to £42,295 across the residential strategic sites. For non-strategic sites, PPE assume a blanket rate of £8,274/unit.
 - iii. CBRE notes that a significant proportion of these costs are driven by education contributions, which are underpinned by estimates of child yield. Different sites will generate different child yields, depending on the provision of family housing. As such, CBRE deems it is not reasonable to apply a single assumption for S106 education contributions to all site typologies.
 - iv. Residential developments delivering family housing, typically on greenfield sites, will be subject to a significantly higher education contribution, in comparison to a higher density non-family housing development. Considering the concerns raised within paragraph 53g of this representation regarding the elevated affordable housing requirement on Grey Belt sites, it should be considered that these sites are also likely to be subject to higher education contribution requirements, placing further pressure on development viability. When combined with CYC & PPE's proposed residential CIL rate of £150/m², this risks undermining the viability of these typologies.
 - v. Considering the variability and scale of S106 costs across the strategic sites, CBRE requests that PPE sensitivity test a range of education contributions to reflect a realistic variation and to ensure that the CIL Charging Schedule does not inadvertently stifle housing delivery.
- r. **BLV:**
- i. **Residential Typologies:** PPE formed opinions of residential land BLVs for the Local Plan viability assessment undertaken in 2018. Subsequently, for the purpose of the CIL Viability Study (December 2022), PPE reportedly used Savills Residential Land Value Index as a proxy to determine the change in current BLVs since the preparation of the Local Plan viability assessment.

- ii. As previously noted by CBRE, it appears that the CIL Viability Study Addendum does not rely on any new land transactional evidence since 2018. PPE has not sought to obtain up to date transactional evidence, which CBRE considers a significant oversight by PPE.
- iii. CBRE therefore remains unclear on the logic and relevance behind the BLVs adopted in the CIL Viability Study Addendum. The BLVs have been extracted from the residential appraisals and reiterated in table 2 below.

Table 2: CIL Viability Study & CIL Viability Study Addendum | BLV

Typology	BLV per gross area (hectares)
Residential (City Centre)	£1,700,000
Residential (Urban & Suburban)	£1,120,000
Residential (Village/Rural)	£900,000
Residential Agricultural /Greenfield	£450,000

Source: CYC

- iv. In previous representations, CBRE gathered market transactional evidence for sites brought forward for residential use as set out below.
 - 1. Eboracum Way, York: In December 2022, the 0.57-acre site was acquired by Modernistiq (Layerthorpe) Ltd for £2,900,000 (£5,102,669/gross acre). Residential scheme comprising 62 units (planning ref: 19/01467/FULM).
- v. Under Section 5 of the CIL Consultation Statement, CYC & PPE state *“the sighted land value that CBRE provide for the Eboracum Way scheme does not inform us if the price paid is the minimum that the landowner would sell a site for after excluding hope value, as is the criteria for setting BLV within PPG Viability.”* However, CYC & PPE fail to provide up-to-date transactional evidence to justify maintaining the rates set out in Table 2.
- vi. CBRE recommends that CYC seek to source and consider such evidence in taking a ‘stand back’ approach and a York-specific market sense-check.
- s. **Summary:** Overall, CBRE would advocate a cautious approach is taken by CYC to setting CIL rates in what continues to be a volatile housing market in 2025, particularly if CYC is minded to seek to maintain or increase levels of affordable housing provision as part of the overall housing supply.

Results & Re-Appraisal

64. The CIL Viability Study Addendum sets out the results of the updated viability modelling within Table A3 on p.3. This is replicated below for ease.

Table A3 Viability of residential developments in CYC and their £psm CIL liable floorspace headroom

ID	Typology	Headroom per CIL liable sqm	
		Addendum Nov 2023	Addendum Jun'25
2	Centre/ City Centre Extension - Medium - 50 dwellings - Greenfield	£347	£100
3	Centre/ City Centre Extension - Small - 20 dwellings - Greenfield	£531	£279
4	Urban - Large - 45 dwellings – Greenfield	£335	£100
5	Urban - Medium - 25 dwellings – Greenfield	£366	£130
6	Urban - Small - 10 dwellings – Greenfield	£554	£373
7	Suburban - Large - 140 dwellings – Greenfield	£362	£140
8	Suburban - Medium - 38 dwellings – Greenfield	£290	£54
9	Suburban - Small - 8 dwellings – Greenfield	£499	£318
10	Village - Village - 122 dwellings – Greenfield	£245	£23
11	Village - Large - 33 dwellings – Greenfield	£298	£62
12	Village - Medium - 7 dwellings – Greenfield	£514	£333
13	Village - Small - 4 dwellings – Greenfield	£561	£380
14	Centre/ City Centre Extension - Large - 95 dwellings - Brownfield	£458	£240
15	Centre/ City Centre Extension - Medium - 50 dwellings - Brownfield	£514	£292
16	Centre/ City Centre Extension - Small - 20 dwellings - Brownfield	£561	£335
17	Urban - Large - 45 dwellings – Brownfield	£362	£150
18	Urban - Medium - 25 dwellings – Brownfield	£371	£158
19	Urban - Small - 10 dwellings – Brownfield	£487	£306
20	Suburban - Large - 140 dwellings – Brownfield	£421	£219
21	Suburban - Medium - 38 dwellings – Brownfield	£281	£68
22	Suburban - Small - 8 dwellings – Brownfield	£414	£233
23	Village - Village - 122 dwellings – Brownfield	£301	£99
24	Village - Large - 33 dwellings – Brownfield	£270	£57
25	Village - Medium - 7 dwellings – Brownfield	£416	£234
26	Village - Small - 4 dwellings – Brownfield	£463	£279
41	SS14 Terry's Extension Sites (ST16)	£310	£117
46	SS20 Imphal Barracks (ST36)	£363	£157

65. In paragraph 10, PPE state “despite the reductions in sales values and increases in build costs during the past 18 months in the City of York, all sites remain viable under the cumulative Local Plan policies in the current market.”
66. Table A3 presents PPE's headroom analysis which concludes that all residential typologies can viably accommodate both CIL and the cumulative Local Plan policies, including 20% / 30% affordable housing, in the current market.
67. The headroom analysis maintains PPE's previous conclusions that only Strategic Site 16 ('SS14 Terry's Extension Sites') and Strategic Site 36 ('SS20 Imphal Barracks') can viably accommodate CIL.

68. It is evident that there has been a severe compression in the headroom based on PPE's updated viability evidence for almost all typologies tested.
69. This is notwithstanding representations that the conclusions within Table A3 and the CIL Viability Study Addendum are not reflective of the full deterioration in market conditions over the past 24 months. CBRE cannot support the levels of CIL headroom being identified within Table A3 for residential typologies, for the reasons set out earlier within this representation.
70. On the basis of the levels of CIL headroom identified within Table A3, PPE state *"an average rate of £200 psm remains the highest amount that the generic sites could afford in the bulk of cases."* PPE apply a viability buffer of 25% to this to arrive at a CIL rate of £150/m² for non strategic residential sites.
71. Firstly, it appears that PPE's identified headroom of £200/m² reflects an average of the headroom identified for each residential typology tested (2 to 26). PPE's suggestion that, in the majority of cases, this reflects the 'highest amount' of CIL that the non-strategic sites could support is therefore incorrect.
72. On the basis of this flawed methodology, PPE apply a blanket residential CIL rate across all non strategic residential typologies, which reflect varying sizes and market contexts. Table A3 presents a number of residential typologies which PPE determine to generate a CIL headroom of less than £150/m² – these site typologies are medium and larger scale. On this basis, these typologies, which would be expected to account for a high provision of CYC's housing land supply would be unable to viably support the CIL charge proposed by PPE and would be rendered financially unviable.
73. It appears that many of the site typologies that demonstrate CIL headroom within Table A3 are limited to very small scale – frequently being 10 units or fewer.
74. Secondly, PPE state that *"a buffer of 25% is considered appropriate for setting CIL within the context of Planning Policy Guidance, which provides standard inputs, including the developer return, which guidance suggests should be between 15% and 20% of GDV, adjusting for risk, when establishing plan policies, including CIL."*
75. CBRE notes that the PPG paragraph referenced by PPE (PPG Viability, Paragraph: 018 Reference ID: 10-018-20190509) provides guidance only on a reasonable allowance for developer's return and provides no guidance on viability buffers. CBRE notes that PPG advocates the application of a buffer in relation to CIL, however, appropriate levels of viability buffers are not explicit in the NPPF / PPG and should be based on a number of factors including local market conditions and development / delivery risk.
76. CBRE notes that within PPE's initial CIL Viability Study (December 2022), PPE included a 60% buffer, stating that *"the City of York is likely to soon have a Local Plan that will place non CIL funding obligations on future developments including new costs for meeting the Climate Emergency and affordable housing rates, which the development industry will need to absorb, and this might take time to bed in."* PPE also consider the context that *"there is also uncertainty in the economy that is currently heading into recession, and uncertainty in the planning system due to the current Government's narrative for introducing significant reforms."*
77. PPE acknowledges in their initial CIL Viability Study that a cautious viability buffer enables the marketplace to *"easily adjust to the new form of infrastructure funding along with the new Local Plan policies without coming forward to negotiate on viability grounds or amending or delaying delivery until they feel certain that it is worthwhile progressing with their current development proposal"*.
78. It is evident in the CIL Viability Study that PPE view a higher viability buffer (60%) greater facilitates the delivery of homes, in the context of emergent legislation and Local Plan policy requirements. As such legislation and policies are now coming into effect, and PPE's CIL Viability Addendum (June 2025) indicates that viability has worsened through reduced values and rising costs, CBRE questions why PPE's stance on a

reasonable viability buffer has shifted. It appears highly contradictory and represents a wholesale reversal of PPE's prior professional advice to CYC.

79. CBRE is aware of a research study⁶ published by Lichfields planning consultants in August 2021, which presents analysis that indicates viability buffers ranged from 20-70% and noted higher buffers applied to larger and strategic sites.
80. CBRE considers that PPE's adopted viability buffer of 25% is beyond the lower end of expectations, particularly considering the trends in values and build costs observed by PPE, and given the technical deficiencies highlighted above. CBRE advocates that a viability buffer of 50%+ should be applied, in this context.
81. Regarding the two Strategic Sites assessed, PPE state that *"the updated viability results show them to have lower viability headrooms in the current market."* Following this, PPE state that *"the current proposed DCS rate of £100 psm would still result in viable developments, including a 17% viability buffer for ST16 and a 57% buffer for ST36."* On this basis, PPE claim that *"from this analysis, an appropriate rate for non strategic site delivery of residential dwellings at ST16 and ST36 remains at £100 psm."*
82. CBRE questions why, having stated that a 25% viability buffer is appropriate, PPE deems a 17% viability buffer to be acceptable for ST16. This is further undermined by PPE's view that a 57% buffer is appropriate for site ST36. Considering the underlying market dynamics and economic backdrop acknowledged both by PPE and CBRE, as outlined above, plus additional costs such as BSL, it is evident that a 17% viability buffer could easily be eroded and risk the viability of the scheme. As such, CBRE also advocates that a viability buffer of 50%+ should also be applied to all strategic sites, with any identified headroom for CIL adjusted downwards to accommodate this buffer, rather than the opposite.

CBRE Updated Appraisal Modelling | Residential

83. Given CBRE's analysis set out above firmly highlights both technical issues within the CIL Viability Addendum (2025) evidence base methodology and inputs, CBRE has independent viability modelling of a Residential typology to illustrate the implications for CIL headroom in the current market.

a. CIL Headroom Analysis | CBRE Modelling:

- i. CBRE has tested Typology 17 (Urban – Large – 45 Dwellings – Brownfield), against which PPE identify a CIL headroom of £150/m², reflecting an exact match of the recommended Residential CIL charge.
- ii. CBRE has increased the construction costs to reflect the BCIS Estate Housing – Generally (median) rate equates as published at July 2025, with tenders restricted to the last 5 years (£1,643/m² or £153/ft²). This is deemed an appropriate rate for medium housebuilders in the current market.

⁶ Lichfields (2021) Fine Margins, Viability Assessments in Planning and Plan-Making

- iii. Secondly, CBRE has increased the construction cost of garages adopted within the CIL Viability Addendum modelling from £9,000 per garage to £15,000 per garage, reflecting the up-to-date evidence provided by CBRE.
- iv. Thirdly, CBRE has adjusted the contingency allowance utilised in the CIL Viability Addendum modelling to reflect CBRE's professional opinion of a reasonable rate of 5.00%.
- v. Finally, CBRE has incorporated the cost of Building Safety Levy at the previously developed land rate (£15.81/m²) to the open market floorspace delivered from October 2026, in line with the Government's anticipated implementation timeline.
- vi. 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 Helmsley Securities to prepare CYC's evidence.
- vii. CBRE adjusted appraisal of Typology 17 generates a Residual Land Value ('RLV') of £735,131, which falls below PPE's identified BLV for this typology of £1,109,550. On this basis, Typology 17 is **unviable** and there is no headroom for CIL. A copy of CBRE's Residential Appraisal is provided within **Enclosure 3**.
- viii. Evidently, the same adjustments to the other residential typologies would have an equivalent effect on viability and the headroom available to accommodate CIL. Considering that 11 of the 25 tested typologies are assessed by PPE to have CIL headroom equal to or below the recommended CIL charge of £150/m², CBRE's modelling illustrates that a significant proportion of tested typologies would be unable to viably support CYC & PPE's proposed residential CIL charge, in the context of current market conditions.
- ix. 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 Residential typologies to either meet the costs of CIL at any rate above £nil.

Failure to Strike an Appropriate Balance

- 84. In setting CIL rates, CYC 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)⁷, CYC 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.
- 85. As set out in PPG⁸, Charging Schedules should be consistent with, and support the implementation of, up-to-date relevant plans.

⁷ CIL Regulations 2010 (as amended)

⁸ PPG CIL: Paragraph: 011 Reference ID: 25-011-20190901

86. 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.
87. As also clearly set out in the RICS Guidance⁹, 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.
88. Moreover, CBRE concludes that it is illogical and counter-intuitive for CYC to introduce the proposed CIL rates for residential use development for the published CIL Viability Study Addendum document does not constitute up-to-date appropriate available evidence to underpin the proposed rates within the Revised CIL DCS.
89. As a result, Helmsley Securities would strongly contend that the Revised CIL DCS is unsound and should not be endorsed by the Examiner for the above fundamental reasons and further technical deficiencies expanded upon below.
90. If non-compliance could not be rectified via modification(s) or by recommendation from the Examiner, the Examiner would be requested to reject the Revised CIL DCS in accordance with Section 212A(2) of the 2008 Act.

⁹ 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

91. Helmsley Securities cannot endorse or support the Revised CIL DCS, and its underpinning evidence base in the form of the CIL Viability Study Addendum, as presently published.
92. In fact, for the reasons set out in this document and its enclosures, Helmsley Securities has fundamental doubts regarding the appropriateness of the timing of this consultation on a new CIL DCS.
93. Helmsley Securities also has severe reservations regarding the questionable validity and dependability of the published viability evidence base upon which the proposed new charging rates for residential use development within the Revised CIL DCS is reliant, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.
94. On this basis, Helmsley Securities cannot agree with CYC that there is an appropriately evidenced and legally compliant basis upon which the Revised 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.
95. Helmsley Securities 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.
96. To rectify the issues identified, Helmsley Securities advocate that the CIL rates proposed to apply to residential development should be reduced to £0/m² via modification to the published Revised CIL DCS or CYC's pursuing of a CIL regime altogether held in abeyance until economic and property market conditions demonstrably improve.
97. If CYC does not take account of these recommendations, Helmsley Securities 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.
98. Should CYC wish to engage directly with Helmsley Securities 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	Draft Charging Schedule Published	01/06/2023	Nine residential housing charging zones with rates of £0 to £50 per square metre for Greenfield residential sites. £0 per square metre for all brownfield residential sites. Residential institutions and care home development rate of £60 per square metre for both greenfield and brownfield sites. £0 per square metre charge for all other uses.	£0 per square metre for all other uses.	£0 per square metre for all other uses.
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	Abandoned	19/01/2021	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: RICS BCIS – Rebased to York (Q3 2025)

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 26-Jul-2025 07:30

Rebased to 3Q 2025 (403; forecast) and York (96; sample 20)

MAXIMUM AGE OF RESULTS: 5 YEARS

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
New build								
810.1 Estate housing								
Generally (5)	1,667	774	1,380	1,643	1,843	3,346	183	
Single storey (5)	1,947	1,288	1,642	1,815	2,115	3,346	31	
2-storey (5)	1,615	774	1,360	1,628	1,804	2,568	148	
3-storey (5)	1,446	1,116	-	1,443	-	1,782	4	
810.12 Estate housing semi detached								
Generally (5)	1,773	1,063	1,535	1,696	1,899	3,346	51	
Single storey (5)	1,899	1,288	1,650	1,833	1,884	3,346	17	
2-storey (5)	1,709	1,063	1,338	1,660	1,909	2,568	33	
3-storey (5)	1,782	-	-	-	-	-	1	
810.13 Estate housing terraced								
Generally (5)	1,496	891	1,315	1,381	1,724	2,076	11	
2-storey (5)	1,534	891	1,346	1,455	1,760	2,076	10	
3-storey (5)	1,116	-	-	-	-	-	1	
816. Flats (apartments)								
Generally (5)	1,939	1,023	1,541	1,855	2,229	3,674	139	

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
1-2 storey (5)	1,929	1,023	1,539	1,890	2,298	3,399	29	
3-5 storey (5)	1,919	1,031	1,541	1,820	2,146	3,674	100	
6 storey or above (5)	2,167	1,448	1,845	2,304	2,475	2,899	10	
856.2 Students' residences, halls of residence, etc (5)	1,787	1,743	-	-	-	1,830	2	
Rehabilitation/Conversion								
816. Flats (apartments)								
Generally (5)	2,014	393	1,149	1,205	2,477	4,843	5	
1-2 storey (5)	1,205	-	-	-	-	-	1	
3-5 storey (5)	2,216	393	-	1,813	-	4,843	4	

Enclosure 3: CBRE Residential Appraisal – Typology 17

York CIL Representations

Typology 17: Urban - Large - 45 Dwellings - Brownfield

CBRE Appraisal

Development Appraisal

CBRE

15 August 2025

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Appraisal Summary for Phase 3 Typology 17 - CBRE Aug 25

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Private Units	38	36,748	371.55	359,313	13,653,888
Social Rent	4	3,384	148.63	125,738	502,950
Affordable Rent	4	3,384	185.78	157,172	628,688
Intermediate	<u>2</u>	<u>1,709</u>	260.19	222,332	<u>444,665</u>
Totals	48	45,225			15,230,191

NET REALISATION

15,230,191

OUTLAY

ACQUISITION COSTS

Residualised Price		735,131	
			735,131
Purchaser's Costs	1.75%	12,865	
			12,865

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
Build Costs: Private Units	37,995	152.48	5,793,507
Build Costs: Affordable Units	<u>9,280</u>	152.64	<u>1,416,470</u>
Totals	47,275 ft²		7,209,977
Contingency		5.00%	410,274
			7,620,251
Other Construction			
16no. Garages (£15k per unit)			249,555
Externals	10.00%		745,953
Abnormals			378,000
Building Safety Levy			30,197
			1,403,705

Section 106 Costs

S106		397,152
Policy G12a		48,000
Policy G12: BNG		11,088
Policy CC1, CC2 & CC3		720,000
EV Charging Points		48,000
Cat(3)(B)		54,480
Cat(3)(A)		27,907
		1,306,627

PROFESSIONAL FEES

Professional Fees	8.00%	656,439
		656,439

DISPOSAL FEES

Private Disposal Fees		3.00%	409,617
Affordable Disposal Fees	10 un	500.00 /un	5,000
			414,617

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)			
Land			133,920
Construction			119,870
Other			1,566
Total Finance Cost			255,356

TOTAL COSTS

12,404,991

PROFIT

2,825,200

Performance Measures

Profit on Cost%	22.77%
Profit on GDV%	18.55%
Profit on NDV%	18.55%

York CIL Representations**Typology 17: Urban - Large - 45 Dwellings - Brownfield****CBRE Appraisal**

IRR% (without Interest)	52.78%
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Profit Erosion (finance rate 7.750)	2 yrs 8 mths
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York CIL Representations

Typology 17: Urban - Large - 45 Dwellings - Brownfield

CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page A 1

	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
Monthly B/F	0	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)
Revenue										
Sale - Intermediate	0	0	0	0	0	0	0	0	0	18,528
Sale - Affordable Rent	0	0	0	0	0	0	0	0	0	26,195
Sale - Social Rent	0	0	0	0	0	0	0	0	0	20,956
Sale - Private Units	0	0	0	0	0	0	0	0	0	568,912
Disposal Costs										
Private Disposal Fees	0	0	0	0	0	0	0	0	0	(17,067)
Affordable Disposal Fees	0	0	0	0	0	0	0	0	0	(208)
Unit Information										
Private Units										
Social Rent										
Affordable Rent										
Intermediate										
Build Costs: Private Units										
Build Costs: Affordable Units										
Acquisition Costs										
Residualised Price	(735,131)	0	0	0	0	0	0	0	0	0
Purchaser's Costs	(12,865)	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Build Costs: Private Units	0	0	0	(39,280)	(85,971)	(128,692)	(167,442)	(202,222)	(233,032)	(259,871)
Con. - Build Costs: Affordable Units	0	0	0	(9,604)	(21,019)	(31,464)	(40,938)	(49,442)	(56,975)	(63,537)
16no. Garages (£15k per unit)	0	0	0	(1,692)	(3,703)	(5,543)	(7,213)	(8,711)	(10,038)	(11,194)
Externals	0	0	0	(5,058)	(11,069)	(16,570)	(21,559)	(26,037)	(30,004)	(33,460)
Abnormals	0	0	0	(2,563)	(5,609)	(8,397)	(10,925)	(13,194)	(15,204)	(16,955)
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
S106	(6,592)	(15,426)	(22,890)	(28,983)	(33,704)	(37,054)	(39,033)	(39,641)	(38,878)	(36,744)
Policy G12a	0	0	0	(325)	(712)	(1,066)	(1,387)	(1,675)	(1,931)	(2,153)
Policy G12: BNG	0	0	0	(75)	(165)	(246)	(320)	(387)	(446)	(497)
Policy CC1, CC2 & CC3	0	0	0	(4,882)	(10,684)	(15,993)	(20,809)	(25,132)	(28,961)	(32,296)
EV Charging Points	0	0	0	(325)	(712)	(1,066)	(1,387)	(1,675)	(1,931)	(2,153)
Cat(3)(B)	0	0	0	(369)	(808)	(1,210)	(1,575)	(1,902)	(2,191)	(2,444)
Cat(3)(A)	0	0	0	(189)	(414)	(620)	(807)	(974)	(1,123)	(1,252)
Contingency	0	0	0	(2,782)	(6,088)	(9,113)	(11,858)	(14,321)	(16,502)	(18,403)
Professional Fees										
Professional Fees	0	0	0	(4,451)	(9,741)	(14,582)	(18,972)	(22,913)	(26,404)	(29,445)
Net Cash Flow Before Finance	(754,587)	(15,426)	(22,890)	(100,577)	(190,401)	(271,617)	(344,226)	(408,226)	(463,619)	106,911
Debit Rate 7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(4,873)	(4,973)	(5,184)	(5,834)	(7,064)	(8,935)	(11,158)	(13,794)	(12,909)
Net Cash Flow After Finance	(754,587)	(20,300)	(27,863)	(105,761)	(196,235)	(278,681)	(353,160)	(419,384)	(477,413)	94,002

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page B 1

	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
Monthly B/F	0	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)
Cumulative Net Cash Flow Monthly	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)	(2,539,383)

York CIL Representations

Typology 17: Urban - Large - 45 Dwellings - Brownfield

CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

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011:Jun 2026 (2,539,383)	012:Jul 2026 (2,482,867)	013:Aug 2026 (2,455,477)	014:Sep 2026 (2,449,035)	015:Oct 2026 (2,454,828)	016:Nov 2026 (2,461,149)	017:Dec 2026 (2,473,162)	018:Jan 2027 (2,483,439)	019:Feb 2027 (2,484,734)	020:Mar 2027 (2,469,978)	021:Apr 2027 (2,431,604)	022:May 2027 (2,362,223)
18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528
26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195
20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956
568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912
(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)
(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)
0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0
(282,741)	(301,639)	(316,568)	(327,526)	(334,514)	(337,531)	(336,578)	(331,655)	(322,761)	(309,898)	(293,063)	(272,259)
(69,128)	(73,749)	(77,398)	(80,078)	(81,786)	(82,524)	(82,291)	(81,087)	(78,913)	(75,768)	(71,652)	(66,565)
(12,179)	(12,993)	(13,636)	(14,108)	(14,409)	(14,539)	(14,498)	(14,286)	(13,903)	(13,349)	(12,624)	(11,728)
(36,405)	(38,838)	(40,760)	(42,171)	(43,071)	(43,459)	(43,337)	(42,703)	(41,558)	(39,901)	(37,734)	(35,055)
(18,448)	(19,681)	(20,655)	(21,370)	(21,825)	(22,022)	(21,960)	(21,639)	(21,059)	(20,219)	(19,121)	(17,764)
0	0	0	0	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)
(33,238)	(28,361)	(22,113)	(14,494)	0	0	0	0	0	0	0	0
(2,343)	(2,499)	(2,623)	(2,714)	(2,771)	(2,796)	(2,789)	(2,748)	(2,674)	(2,568)	(2,428)	(2,256)
(541)	(577)	(606)	(627)	(640)	(646)	(644)	(635)	(618)	(593)	(561)	(521)
(35,138)	(37,487)	(39,342)	(40,704)	(41,572)	(41,947)	(41,829)	(41,217)	(40,112)	(38,513)	(36,421)	(33,836)
(2,343)	(2,499)	(2,623)	(2,714)	(2,771)	(2,796)	(2,789)	(2,748)	(2,674)	(2,568)	(2,428)	(2,256)
(2,659)	(2,837)	(2,977)	(3,080)	(3,146)	(3,174)	(3,165)	(3,119)	(3,035)	(2,914)	(2,756)	(2,560)
(1,362)	(1,453)	(1,525)	(1,578)	(1,611)	(1,626)	(1,621)	(1,598)	(1,555)	(1,493)	(1,412)	(1,311)
(20,023)	(21,361)	(22,418)	(23,194)	(23,689)	(23,903)	(23,835)	(23,487)	(22,857)	(21,946)	(20,754)	(19,280)
(32,036)	(34,178)	(35,869)	(37,111)	(37,902)	(38,244)	(38,136)	(37,578)	(36,571)	(35,113)	(33,206)	(30,849)
68,734	39,164	18,203	5,849	5,284	(216)	1,521	10,494	26,704	50,151	80,834	118,754
7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(12,218)	(11,775)	(11,760)	(11,642)	(11,605)	(11,797)	(11,798)	(11,788)	(11,949)	(11,776)	(11,452)	(11,158)
56,516	27,390	6,443	(5,794)	(6,321)	(12,013)	(10,277)	(1,294)	14,755	38,374	69,381	107,596

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page B 2

011:Jun 2026 (2,539,383)	012:Jul 2026 (2,482,867)	013:Aug 2026 (2,455,477)	014:Sep 2026 (2,449,035)	015:Oct 2026 (2,454,828)	016:Nov 2026 (2,461,149)	017:Dec 2026 (2,473,162)	018:Jan 2027 (2,483,439)	019:Feb 2027 (2,484,734)	020:Mar 2027 (2,469,978)	021:Apr 2027 (2,431,604)	022:May 2027 (2,362,223)
(2,482,867)	(2,455,477)	(2,449,035)	(2,454,828)	(2,461,149)	(2,473,162)	(2,483,439)	(2,484,734)	(2,469,978)	(2,431,604)	(2,362,223)	(2,254,627)

York CIL Representations

Typology 17: Urban - Large - 45 Dwellings - Brownfield

CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page A 3

023:Jun 2027 (2,254,627)	024:Jul 2027 (2,101,107)	025:Aug 2027 (1,894,136)	026:Sep 2027 (1,626,338)	027:Oct 2027 (1,289,891)	028:Nov 2027 (877,127)	029:Dec 2027 (261,378)	030:Jan 2028 355,938	031:Feb 2028 973,254	032:Mar 2028 1,590,569	033:Apr 2028 2,207,885
18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528
26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195
20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956
568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912
(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)	(17,067) (208)
0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0
(247,484)	(218,739)	(186,023)	(149,337)	(108,681)	0	0	0	0	0	0
(60,508)	(53,480)	(45,481)	(36,512)	(26,572)	0	0	0	0	0	0
(10,660)	(9,422)	(8,013)	(6,433)	(4,681)	0	0	0	0	0	0
(31,865)	(28,164)	(23,952)	(19,228)	(13,993)	0	0	0	0	0	0
(16,147)	(14,272)	(12,137)	(9,744)	(7,091)	0	0	0	0	0	0
(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0
(2,050)	(1,812)	(1,541)	(1,237)	(900)	0	0	0	0	0	0
(474)	(419)	(356)	(286)	(208)	0	0	0	0	0	0
(30,757)	(27,184)	(23,118)	(18,559)	(13,507)	0	0	0	0	0	0
(2,050)	(1,812)	(1,541)	(1,237)	(900)	0	0	0	0	0	0
(2,327)	(2,057)	(1,749)	(1,404)	(1,022)	0	0	0	0	0	0
(1,192)	(1,054)	(896)	(719)	(524)	0	0	0	0	0	0
(17,526)	(15,490)	(13,173)	(10,576)	(7,696)	0	0	0	0	0	0
(28,041)	(24,784)	(21,078)	(16,921)	(12,314)	0	0	0	0	0	0
163,910	216,303	275,933	342,799	416,902	617,316	617,316	617,316	617,316	617,316	617,316
7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(10,391)	(9,332)	(8,135)	(6,352)	(4,139)	(1,566)	0	0	0	0	0
153,520	206,971	267,799	336,447	412,764	615,749	617,316	617,316	617,316	617,316	617,316

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page B 3

023:Jun 2027 (2,254,627)	024:Jul 2027 (2,101,107)	025:Aug 2027 (1,894,136)	026:Sep 2027 (1,626,338)	027:Oct 2027 (1,289,891)	028:Nov 2027 (877,127)	029:Dec 2027 (261,378)	030:Jan 2028 355,938	031:Feb 2028 973,254	032:Mar 2028 1,590,569	033:Apr 2028 2,207,885
(2,101,107)	(1,894,136)	(1,626,338)	(1,289,891)	(877,127)	(261,378)	355,938	973,254	1,590,569	2,207,885	2,825,200

e

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

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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



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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

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 accommodation 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

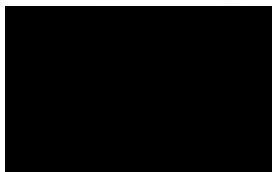
We trust that these representations will be given due consideration as part of the consultation process.

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.

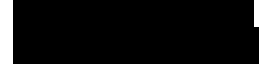
Should you require any further information or clarification, please do not hesitate to contact us.

Yours sincerely,

Stantec UK Limited



Lucie Jowett
Planning Associate Director



stantec.com/uk

From: Cameron, Iain @ Birmingham [REDACTED]
Sent: 15 August 2025 17:37
To: localplan@york.gov.uk
Cc: Bob Bratland; Matthew Roe; Spilsbury, Matt [REDACTED]; Borrowdale, Sophie [REDACTED]; [REDACTED]; Speakman, Ben [REDACTED]
Subject: Representations on behalf of Danehurst- City of York CIL statement of modifications Consultation
Attachments: CYC Revised CIL DCS Mods Consultation 2025 - Danehurst Representation (CBRE 15.08.25).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.

Dear sir/madam,

Please find representations on behalf of Danehurst in response to the Council's Statement of Modifications Consultation.

Contact details are set out below.

Kind regards

Iain

Iain Cameron MRICS

Surveyor

CBRE | National Planning & Development | Development & Regeneration

55 Temple Row | Birmingham | B2 5LS

[REDACTED]

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City of York CIL Statement of Modifications Consultation

Technical representation prepared by CBRE UK Ltd on behalf of:

Danehurst

August 2025

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Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by Danehurst, which has 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') Statement of Modifications ('SoM') consultation ('the consultation').
2. CBRE's technical representations focus upon the evidence base underpinning the CYC CIL DCS Proposed Modifications – specifically the City of York CIL Viability Addendum ('CIL Viability Addendum') produced by Porter Planning Economics ('PPE') and dated June 2025.
3. An overarching representation has been prepared by York-based town planning consultancy Rok Planning Limited.

The Consultation

4. CYC has published the following documents:
 - Draft CIL Charging Schedule (June 2025)
 - Statement of Modifications (June 2025)
 - Notice of Submission (June 2025)
 - Consultation Statement (June 2025)
 - CIL Consultation Spring 2023 Representations
 - CIL Consultation Winter 2023 Representations
 - CIL Viability Assessment Update (June 2025)
 - CIL Sensitivity Test Viability Report (November 2023)
 - CIL Sensitivity Test Viability Report Errata Addendum (December 2023)
 - CIL Viability Assessment Study (December 2022)
 - CIL Infrastructure Funding Gap Assessment (July 2025)
 - Local Plan Infrastructure Delivery Plan (July 2025)
5. The CIL DCS SoM consultation ran to 15 August 2025.
6. Independent examination of the CIL DCS is scheduled for Tuesday 2nd September 2025, following the close of the CIL DCS consultation.

Prior Representations

CBRE was previously instructed to prepare representations on the previous CIL Viability Study evidence base produced by PPE on behalf of CYC, as published as part of the CYC CIL DCS Spring and Winter 2023 consultations.

The previous representations highlighted technical issues with the evidence base, which undermined the validity of this to inform CYC's proposed CIL charging regime.

Many issues remain unresolved in CYC's latest published evidence base.

In summary, CBRE's previous representations identified the following issues:

- Illogical timing of implementation of CIL during a period of economic deterioration and challenge.
- Outdated evidence, in particular relying on unrealistically low construction costs that fail to reflect the recent inflationary environment.
- Absence of testing for the conversion of existing non-residential floorspace for residential use (e.g. upper floors in existing premises, which are prevalent in York).
- Unduly simplistic core/non-core residential pricing approach.
- Lack of evidence in supporting proposed Benchmark Land Values ('BLV').
- Lack of transparency by not providing corresponding viability appraisals for stakeholders to analyse.

CYC and PPE have provided a formal set of responses to the CIL Viability Study consultation representations within the 'CIL Consultation Statement'. This provides a summary of the main issues raised in both the Spring 2023 and Winter 2023 consultation and outlines CYC's response. However, these responses lack robust justification and do not suitably detail why the issues raised within the representations have not been addressed within the CIL Viability Addendum.

As such, within this representation, CBRE has referred to and provided responses back to PPE's and CYC's responses set out within the CIL Consultation Statement and CIL Viability Assessment Update.

Danehurst Background

7. Danehurst is a developer of Purpose Built Student Accommodation ('PBSA') and residential throughout the UK. Danehurst has completed a number of PBSA schemes within London and the South East, as well as in regional cities including Southampton and Edinburgh.
8. Danehurst intends to bring forward a major redevelopment scheme in York city centre at Layerthorpe and has submitted a planning application on the site, supported by a consultancy team led by planning consultants Rok Planning Limited.

Danehurst's Stance

9. Danehurst has fundamental concerns regarding:
 - a. CYC's proposal to introduce CIL charging on 'off-campus' purpose built student accommodation ('PBSA') development within the revised CIL DCS; and
 - b. CYC's proposal to introduce CIL charging on residential dwellings within the City of York in the Revised CIL DCS.
10. It is Danehurst'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.
11. In light of above Danehurst does not accept the validity and reliability of the published viability evidence base upon which the proposed residential charging rates within the Revised CIL DCS relies, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.

12. On this basis, Danehurst cannot agree with CYC that there is an appropriately evidenced and legally compliant basis upon which the Revised 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.
13. Should CYC determine not to rectify the issues identified in this representation, Danehurst 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

14. 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.
15. This constitutes Danehurst's formal request to be heard at the examination of the CIL DCS, as an independent stakeholder organisation, and to be notified by CYC of the events listed in paragraph 12 above. This notification should be provided to both Rok Planning and CBRE, as instructed joint agents.

Matters of Representation

Purpose

16. This section of the document sets out the matters of representation that Danehurst 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 Revised CIL DCS Rates

17. The Revised CIL DCS proposes a significant increase in the costs on development via the introduction of CIL charging on multiple uses for the first time.
18. Notably, the Revised CIL DCS introduces a revised residential CIL rate and the reinstatement of strategic sites ST1 and ST5 (highlighted blue)

Modifications are represented as new text in **yellow highlighted bold text (December 2023 modifications)** and **blue highlighted bold text (July 2025 modifications)**

Development type		CIL rate per sqm	Modification Proposed Explanation
Residential dwellings within the City of York		£150	Amend the CIL rate to £200 from £150 to reflect revised viability.
Residential dwellings within the City of York Local Plan strategic sites ST4 , ST7, ST8, ST9, ST14, ST15, ST31 and ST33		£0	To include ST4, ST31 & ST33 as £0 to reflect revised viability.
Residential dwellings within the City of York Local Plan strategic sites ST1, ST5, ST16 and ST36		£100	No change to CIL rate. ST1 and ST5 have been reinstated in this section rectifying an omission from the December 2023 modifications.
Sheltered/ Retirement accommodation		£0	All sheltered/ retirement accommodation now proposed to be £0 rated to reflect revised viability.
Extra care accommodation		£0	All extra care accommodation now proposed to be £0 rated to reflect revised viability.
Purpose Built Student Accommodation	Off Campus	£150	Removed original categories. New split categories to differentiate geographically between on and off campus purpose built student accommodation to reflect revised viability.
	On Campus	£0	
Convenience ¹ retail with up to 450 sqm gross internal area		£0	Amend the CIL rate to £0 from £100 to reflect revised viability.
Comparison ² retail built outside the City Centre boundary		£0	Amend the CIL rate to £0 from £100 to reflect revised viability.
Comparison retail built inside of the City Centre boundary		£0	No change proposed
All other development		£0	No change proposed

¹ Convenience retail provides lower value good purchased regularly to meet day to day needs such as food, newspapers, petrol etc.

² Comparison retail provides higher value goods purchased less often, such as household items, electrical goods, clothes, shoes etc

19. These are not incremental changes, but rather represent a fundamental shift to introduce substantial rates of CIL charging across multiple uses both a city-wide and a zonal basis. This is particularly true for PBSA, where the proposed changes will coincide with the introduction of Offsite Financial Contributions towards Affordable Housing (Policy H7 of the CYC Local Plan 2025).
20. 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

21. Due to the challenging economic backdrop, only Calderdale Council has pursued the adoption or revision of a CIL charging schedule in Yorkshire and Humber, since Harrogate adopted their CIL Charging Schedule in July 2020.
22. CBRE is aware that other Local Authorities such as Birmingham City Council has halted proposals to formally review their CIL Charging Schedule over this period due to the challenging economic and property market context. CYC's proposition to introduce high charging rates for the first time is contradictory to decisions being made by other major regional cities and district authorities across the North and Midlands.
23. As a result, such proposals by CYC must necessitate comprehensive, robust, and up-to-date available evidence of financial viability to provide appropriate justification that they will strike an appropriate balance in accordance with Regulation 14(1) of the CIL Regulations (as amended).
24. Further reference to the illogical timing of CYC's decision to introduce a CIL charging regime is set out in the following sub section.

Illogical Timing

25. The UK property market is experiencing a prolonged and highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally since 2022. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Whilst the Bank of England base rate has contracted steadily under the current Labour government, development and investment across a wide range of sectors continue to face headwinds, which commenced in mid-2022 and are expected to prevail into early 2025.
26. Specifically:
 - a. The UK economy remains challenged with numerous headwinds. Most notably, inflation remains elevated, driven primarily by regulated gas price increases. As at June 2025, CPI was 4.1% and had remained in excess of the Government's target of 2% since 2021. This inflation has contributed to falling real household incomes throughout 2025.
 - b. Labour markets have also softened as nominal and real wage growth have slowed, and business taxation has increased. CBRE estimates that unemployment has increased 30bps to 4.7% since the Autumn Budget, and forecast the labour market to continue loosening through the remainder of 2025.
 - c. Global uncertainty and risks, driven by continued conflict in Ukraine and the Middle East coupled with U.S. Trade Policy, have stunted activity across the global economy. Despite the UK reaching a trade deal with the U.S., there remains a 10% tariff on most goods and 25% on exports of steel and aluminium. CBRE The ongoing geopolitical conflicts and potential escalation remains a threat to energy markets and medium-term price stability.
 - d. For businesses, the prolonged period of high inflation and instability will continue to erode profit margins, reduce investment, and dampen activity. The increase in taxation via employer national insurance announced in the Spring Statement has placed further pressure on businesses.

¹ Note: this information was obtained from Planning Resource and is understood to have been correct as at August 2025. The rates presented are not indexed, but represent those rates either proposed (latest) or at the date of adoption of relevant Charging Schedules.

- e. The consumer sector also remains volatile, showing month-to-month swings and remaining persistently negative. The GfK Consumer Confidence Index moved down to -19 in July 2025 from a six-month high of -18 in June, as household caution grows amid rising concerns over taxes and inflation.

27. Specifically, considering the PBSA sector, CBRE's baseline forecast for 2025 is as follows:

- a. Overall, the sector continues to be defined by an acute supply and demand imbalance but this is highly nuanced, and an understanding of affordability is key. An in-depth understanding of the submarket dynamics is critical.
- b. New HESA data 2023/24 shows a decline of 1.5% in full-time students to 2.24m, driven by a drop in international students. However, undergraduate application data for 2025/26 from UCAS indicates that internal student demand could recover.
- c. Deliveries in 2024 were the second lowest on record, at approximately 12,500 beds and new supply is expected to remain constrained, with CBRE forecasts indicating less than 18,000 beds delivered per year by 2027.
- d. PBSA transactions slowed in Q1 2025 but investment yields have remained stable for prime regional assets and sentiment remains positive for best in class 'clean and green' properties with stronger rental growth prospects. However, transactions of best in class assets have been limited over the past 24 months due to low supply. With forward funding opportunities becoming less viable, investors are looking towards joint venture or asset management opportunities due to lower risks.
- e. Investor optimism persists due to strong 2025/26 UCAS data, potential further Base Rate cuts and stable long-term sector fundamentals.
- f. Rental growth is beginning to stabilize after years of strong performance and incentives are being deployed to secure early occupancy for the upcoming academic year. As rents stabilise, CBRE expects capital values, on a per bed basis, to plateau in the absence of yield compression. If operating costs continue to rise due to underlying inflationary pressures, capital values could begin to soften over time.
- g. Overall, the PBSA sector continues to face challenges resulting from rising build costs, planning delays and additional regulatory costs, rising operational costs, and restricted development finance.

28. CBRE's baseline forecast for the residential market in 2025 is as follows:

- a. The residential sales market has gradually improved as mortgage rates have fallen, however volatile consumer confidence threatens to hinder this in the context of uncertainty looking forward to the Autumn Statement.
- b. Investment in the living sector in H1 2025 was 30% below the same period of 2024 and CBRE forecast this to be 7% lower for the year than 2024.
- c. A supply and demand imbalance persists, as new regulations have driven some landlords out. Persistent high and increasing construction costs, high debt costs, planning delays, new building safety regulations and associated delays are all contributing to challenges for residential developers.
- d. The anticipated introduction of Future Homes Standard and the Building Safety Levy in 2026 will add further cost burden upon residential developers, placing greater pressure on profit margins and compounding viability challenges.

- e. The inflationary climate coupled with macro-economic and geo-political instability and rising interest rates, has resulted in a softening of residential investment yields since 2023. This has stabilised during 2024 and 2025, but conditions remain challenging and subdued. The liquidity pool of investors seeking forward funding opportunities for Build-to-Rent assets is shallow and, due to the resultant viability constraints, there are few transactions occurring in this challenging market.
 - f. In the context of this challenging backdrop, developers across the UK are relying upon grant funding to help support deliverability of residential schemes.
29. Against this backdrop, CBRE still 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. CYC's proposals to increase the cost burden on development at this point will exacerbate uncertainty and slow or stall development and regeneration plans for PBSA and residential development on sites across the city.
30. Under Section 5 of the CIL Consultation Statement, CYC & PPE address these concerns, stating that *"we acknowledge that markets do fluctuate over time, and even monthly, as they will after CIL is adopted, but it would be impractical to re-run the appraisals every month."* CYC & PPE state that *"instead, in setting the CIL rates, we have allowed for a significant buffer to accommodate such fluctuations."*
31. CBRE consider that CYC and PPE's response misses the point. Markets are in a prolonged challenging period. Any material upswing will likely take years, not months. The addition of a CIL regime will compound this and prolong the impact in York, deterring investment.
32. CBRE's critique of PPE's adopted viability buffer is provided within the 'Results & Re-Appraisal' sub-section of this representation.

Outdated Evidence

33. The published available evidence to inform the Revised CIL DCS is the CIL Viability Addendum produced by PPE dated June 2025. CBRE has reviewed the CIL Viability Addendum in detail.
34. PPE confirm, in paragraph 2, that the Viability Addendum *"sets out the evidence and summarises an update in sales values and build costs for new residential dwellings and student accommodations in the City of York at the current time, and their retested viability results based on the updated assumptions."* PPE also confirm that *"all other viability assumptions that were tested in the City of York CIL Viability Study (Dec'22) and updated in the City of York CIL Viability Addendum (Nov'23) remain the same."*
35. This indicates that, of the information and assumptions underpinning PPE's viability assessment (as at June 2025), only sales values and build costs reflect up-to-date estimates. Therefore, PPE's Viability Addendum relies partly upon data dating as far back as December 2022.
36. As set out above, and well-documented, there 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.
37. Furthermore, there are a number of assumptions critiqued by CBRE in previous representations which have not been appropriately addressed or updated by PPE, and therefore, remain consistent with PPE's previous viability assessments. Notably, these are:
- a. **Garages:** The Viability Addendum includes a single garage cost of £9,000, which is maintained throughout both the CIL Viability Assessment Study (December 2022) and CIL Viability Addendum (November 2023). Under Section 5 of CDS4 'CIL Consultation Statement' (July 2025) PPE state that

“CBRE’s technical note provides no evidence for us to check and/or challenge their opinion, and we consider that we have set an appropriate allowance for this strategic study in terms of separate garage spaces that may appear only on a minority of sites.” CBRE note that PPE’s assumption has not been substantiated by evidence and the technical deficiencies of this are addressed within ‘Technical Deficiencies’ sub-section of this representation. Nonetheless, PPE’s adopted rate of £9,000 per single garage is reflective of assessment of cost as at Q4 2022 and therefore does not account for the significant cost inflation that has occurred in the intervening period. These costs are, therefore, unreflective of those currently facing developers and risk overstating the viability of residential developments and associated headroom to accommodate a CIL charge.

- b. **Demolition and land remediation:** The Viability Addendum does not provide a re-assessment of demolition and land remediation costs. Within the CIL Consultation Statement, PPE state that *“we therefore applied a widely used by the Homes England ready reckoner and have allowed inflationary increases.”* As previously highlighted by CBRE, this remains reliant upon guidance dated 2015, which was withdrawn in 2022. It remains unstated and hence unclear how these costs have been calculated and what constitutes PPE’s allowance for ‘inflationary increases’ and whether these have been allowed up to present day.
 - c. **M4(2), M4(3)(A), M4(3)(B):** Within CBRE’s representation to the Winter 2023 Consultation, CBRE highlighted that the costs associated with accessibility and adaptability requirements were based upon a historic EC Harris report, dated 2014. CBRE requested that these rates should be indexed to present day to fully account for the impact of inflation. CYC & PPE acknowledge this point under Section 3 of the Consultation Statement, but it is not clear whether this has been reflected within PPE’s updated viability testing. Therefore, it appears that PPE’s assessment remains reliant upon cost evidence which is more than 10 years dated, which risks overstating the viability of residential developments and associated headroom to accommodate a CIL charge.
38. In addition, New Fire Safety (England) Regulations 2022 came into force on 23 January 2023 and under the new Regulations, a responsible person (usually a managing agent or similar) is required to provide information and carry out checks on fire safety for all buildings over 11m (or 5 storey) which contain at least two domestic premises.
 39. In accordance with Approved Document B, there is also a requirement for firefighting lifts in buildings to offer additional protection and controls that enable it to be used by the fire and rescue service when fighting a fire. This is a requirement when the lift needs to travel more than 18m above or 10m below the fire service vehicle access level. The firefighting lift must have a secondary back-up power supply to ensure it continues to operate in the event of power failure in the building, a lift control system and a lift communication system.
 40. The recent amendments to Approved Document B also introduces requirements for all new buildings of 30m (circa 10 storeys) or above from September 2026 to include a second separated staircase.
 41. Developers and investors are factoring 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.”

42. 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.”

43. 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).
44. As previously critiqued by CBRE, in spite of recent confirmation and clarification relating to this requirement, it does not appear that the CIL Viability Addendum has accounted for the this or addressed the implication.
45. Furthermore, following technical consultation in 2024, the Government has announced the introduction of the Building Safety Levy², which introduces an additional charge on all new residential dwellings and purpose-built student accommodation (excluding affordable housing), following a methodology broadly consistent with CIL. Draft regulations ('The Building Safety Levy (England) Regulations 2025') were laid in Parliament on 10 July 2025, and whilst these remain subject to parliamentary approval, the Government has announced that the levy will come into operation on 1 October 2026. The confirmed levy rates for York are as follows:
- Previously Developed Land: £15.81/m²
 - Non-Previously Developed Land: £31.61/ft²
46. Whilst development on brownfield land benefits from a 50% discounted rate, this nevertheless reflects an additional and non-negotiable capital cost to new development schemes with a negative impact on development viability, which should be consider within the CIL setting process.
47. Within paragraph 3 of the CIL Viability Addendum, PPE acknowledge the potential impact of the Building Safety Levy on viability headroom.
48. However, PPE simply state that *“these proposed regulatory changes will require secondary legislation, which we understand is planned for the end of 2025. These changes are therefore not yet considered certain and will not impact development viability at this current time.”*
49. Considering the Government's intention is to introduce this charge from October 2026, with the BSL payment due prior to practical completion, CBRE considers it highly likely that this would impact development viability for a number of site typologies assessed.
50. It is also unrealistic to assume that CYC will review its CIL Charging Schedule in circa 12 months. Hence, the BSL will almost immediately act as a supplementary cost to CIL on development, which is not yet accounted for within the viability testing or the buffer allowance provided by PPE (as this buffer pre-dated the Government announcement of the BSL).
51. It is, therefore, recommended that:
- a. the published costs associated with BSL are incorporated with the viability assessment and/or sensitivity tested as a minimum to determine the impact on viability and CIL 'headroom'; or
 - b. an alternative option would be to simply introduce a reduction in the proposed CIL rates commensurate to the additional cost of the BSL (on a £/m² basis), hence allowing an 'equivalence

² <https://www.gov.uk/guidance/building-safety-levy-guidance>

buffer'. It would be straightforward for the Inspector to recommend such a modification to the CIL DCS.

52. CBRE has provided further details upon this relating to residential and PBSA use within the 'Technical Deficiencies' sub-section of this representation.

Technical Deficiencies

Purpose Built Student Housing

53. There are a range of detailed technical issues identified, which render the CIL Viability Addendum as an unsound basis for setting the proposed CIL rates for purpose built student housing, and which Danehurst advocate will require rectification prior to CYC proceeding with the Revised CIL DCS as presently published:

a. **PBSA Typology Room Sizes:**

- i. The PBSA comparables cited in the Appendix A3 of 2025 Addendum do not provide room sizes for the purpose of analysis. The comparables are merely categorised as 'Cluster Flat' and 'Studio Units', which is not transparent and does not assist with comparison between room types.
- ii. The CIL Viability Addendum maintains a generic room size of 17.25m². Under Section 5 of the CIL Consultation Statement, CYC & PPE state their justification as "*The tested PBSA average room size was taken from a previous viability technical note informing the Local Plan viability testing (see examination document EX/CYC/107/3 Student Housing Policy H7 Note August 2022) paragraph 9, which notes that based on the available parameters from four recent PBSAs in York, the average room size for ensuite bedrooms is c.15 sqm and for studios is c.24 sqm. Also, the ratio of ensuite to studio rooms is typically around 3 to 1, so together the average room size is tested at 17.25 sqm within a PBSA typology.*"
- iii. On review of the examination document cited above, the figures of 15sqm for en-suite rooms and 24sqm for studios do not appear to be based on evidence - rather an assumption. CBRE notes PPE's assertion that generic room size is derived from a 3:1 weighted average ratio of en-suite and cluster rooms. CBRE does not disagree with this ratio.
- iv. In previous representations CBRE raised concerns that the typologies presented by CYC and PPE incorporate a net to gross efficiency of 65%, despite evidence from submitted and recently consented schemes indicating a more appropriate efficiency of 55-60%. It appears that this has not been addressed in Section 5 of the CIL Consultation Statement and the efficiency of the typologies appears to remain unchanged.
- v. CBRE has undertaken further research into consented and recently completed schemes to further justify a more appropriate net to gross efficiency:
 1. Frederick House, a 275 unit scheme, comprising 193 en-suite rooms and 82 studios, completed in December 2024 (planning ref: 21/01605/FULM) demonstrates a net to gross efficiency of 56%.
 2. Peppermill Court, a 210 en-suite scheme, granted planning permission in July 2023 (planning ref: 22/02024/FULM) demonstrates a net to gross efficiency of 48%.
- vi. Based on CBRE's knowledge of the York PBSA market, the adopted room size utilised within the CIL Viability Addendum is positioned between the expected size range for 'studios' and

‘cluster/en-suites’. Studios are typically larger at an absolute minimum of 20-21m², whilst cluster / en-suite rooms are generally much smaller at circa 10-15m² and attract lower weekly rents in comparison to PPE’s rental assumption.

- vii. CBRE is aware that CYC refused a planning application for a PBSA scheme at 15 Foss Islands Road based on limited room size and lack of communal space³. The Foss Islands Road scheme included 137 no. studios ranging in size from 20-42m².
- viii. The Foss Islands Road was resubmitted for planning with adjusted room sizes and to resolve the reason for refusal by CYC, the communal areas were increased, resulting in a revised net to gross efficiency of 60%. The revised scheme was approved in March 2024. Additionally, the Coney Riverside development scheme, approved in October 2024 (planning ref: 22/02525/FULM) demonstrates a net to gross efficiency of 60%.
- ix. This evidenced efficiency is 5% lower than that assumed by PPE in the PBSA viability testing. The consequence of this is that the GIA area utilised in viability testing would be expected to be 5% larger than currently modelled by PPE. Hence, PPE’s estimation of build costs for each of the PBSA viability typologies is 5% lower than it should be, which erroneously overstates the financial viability of the PBSA typologies.
- x. Taking this into consideration, it is therefore highly unlikely that the proposed hypothetical scheme used in the PBSA typologies testing would actually be granted planning consent by CYC as the room sizes would be considered too small for studios or not akin with comparable cluster/en-suite room sizes and the communal areas would be insufficient to meet CYC planning officer’s minimum expectations. The room sizes would evidently need to be larger whilst maintaining an appropriate gross to net efficiency. Any reduction in gross to net efficiency would lead to the loss of valuable amenity space which drives the rental value. As a result, this necessitates a proportionate increase in both room sizes and GIA within the PBSA typologies tested.
- xi. Adoption of an unjustified and incorrect room size and building GIA by PPE / CYC poses a significant risk to overstating the viable delivery of PBSA developments by understating the total construction costs attributable to the PBSA typologies.
- xii. For the reasons set out above, CBRE strongly advocates that the room size adopted for viability testing developer-led (i.e. off campus) PBSA typologies is reflective of the York PBSA market.
- xiii. CBRE has prepared an analysis of the impact upon the NIA and GIA of PBSA typologies’ when utilising the (absolute) minimum comparable room size for studios (at 20m²) in the York PBSA market. This analysis is provided in **Table 1**.
- xiv. The table below demonstrates that adopting an informed, representative room size has a significant impact (c. 16% increase) on the GIA of the PBSA typologies.

³ Planning application ref: 22/01795/FULM. Refused 13 July 2023. CYC stated a reason for refusal of the application concerned “The proposed development fails to promote the health and well-being of future occupants due to the limited room size of the studios and lack of communal spaces throughout all levels of the development”.

Table 1: PBSA Typologies | NIA & GIA Analysis: 65% Gross:Net

CIL Viability Addendum PBSA off campus					CBRE Analysis based on York PBSA Market					
Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	GIA Increase %
600	17.25	10,350	65.0%	15,923	600	20.0	12,000	65.0%	18,462	16%
350	17.25	6,038	65.0%	9,288	350	20.0	7,000	65.0%	10,769	16%
200	17.25	3,450	65.0%	5,308	200	20.0	4,000	65.0%	6,154	16%
100	17.25	1,725	65.0%	2,654	100	20.0	2,000	65.0%	3,077	16%

Source: CYC / CBRE Data

- xv. This is based on the assumption of 65% net to gross, which through the Foss Islands refusal demonstrates that 65% is insufficient to meet CYC planning policy requirements as a result, CBRE has also tested the impact of correcting the PBSA built GIA within each of the typologies to a 60%⁴ net to gross efficiency, which is expected to be consistent with CYC's requirements for communal and amenity space within PBSA schemes. This analysis is provided in **Table 2**.

Table 2: PBSA Typologies | NIA & GIA Analysis: 60% Gross:Net

CIL Viability Addendum PBSA off campus					CBRE Analysis based on York PBSA Market					
Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	Beds	Net Room (m ²)	NIA (m ²)	Gross: Net	GIA (m ²)	GIA Increase %
600	17.25	10,350	60.0%	17,250	600	20.0	12,000	60.0%	20,000	16%
350	17.25	6,038	60.0%	10,063	350	20.0	7,000	60.0%	11,667	16%
200	17.25	3,450	60.0%	5,750	200	20.0	4,000	60.0%	6,667	16%
100	17.25	1,725	60.0%	2,875	100	20.0	2,000	60.0%	3,333	16%

Source: CYC / CBRE Data

- xvi. The CIL Viability Addendum therefore miscalculates and misrepresents the correct representative (and reasonable) market-facing NIA and GIA to be utilised for the PBSA typologies in order to secure planning permission in York from CYC, which has severe consequences in understating the total construction costs.
- xvii. CBRE strongly advocates that CYC review the NIA and GIA of PBSA typologies to be reflective of the York PBSA market and CYC's precedents for securing planning permission and adjust their inputs accordingly.

⁴ The resubmitted planning applications for 15 Foss Islands Road (planning ref: 23/01647/FULM) and Coney Riverside (planning ref: 22/02525/FULM) demonstrate a gross to net efficiency of 60.0%.

b. Rents, Yields and Capital Values for Off-Campus PBSA Typologies:

- i. As in the 2023 Addendum, the 2025 Addendum tests the 5no. off-campus PBSA typologies ranging from 25 beds to 600 beds. An average gross rental income is applied of £249/week for a term of 49.2 weeks. This is informed by advertised rents for the 2025/26 academic year, drawn from a cross-section of PBSA schemes across the city, which is provided in Appendix A3 of the document. This reflects an increase of 23% on the rental values adopted in the 2023 Addendum.
- ii. OPEX is deducted at 30% of gross annual rent to generate a net rental income, which is capitalised at an investment yield of 5.25%. This is stated as generating a capital value of £160,000 per room.
- iii. CYC and PPE have not transparently disclosed how either the adopted generic rate of £249/week, or the term of 49.2 weeks has been calculated. CBRE has analysed the comparables in Appendix A3 of the Viability Addendum (2025), which have been used to inform the adopted rental rate and term. It appears that an unweighted average of weekly rents for Cluster Flats (£221.50) and Studios (£277.33) have been averaged to derive the generic rent of £249 per week. Similarly, an unweighted average of 47.5 weeks for en-suite rooms (assuming a standard 50/50 split in tenancy length of 44 and 51 weeks) and 51 weeks for studios, results in an average generic tenancy length of 49.25 weeks.
- iv. CBRE would welcome clarity on the derivation of these figures, given their importance to determining the typologies' Gross Development Value ('GDV').
- v. CBRE has reviewed the evidence base at Appendix A3 of the Viability Addendum, and notes that the figures were collected in August 2024. Purpose built Student Accommodation rents are subject to dynamic pricing, which can cause significant uncertainty in the market value. Additionally, there appears to be several duplicate entries in the evidence base, which may influence the derived rent.
- vi. CBRE conducted a contemporary comparables search in August 2025 order to update PPE's evidence base. This is presented in **Enclosure 2**, and a comparison is summarised in **Table 3**, overleaf:

Table 3: Comparable Rental analysis | Minimum* weekly asking rent per accommodation type

Address	Operator	Cluster Room			Studio		
		PPE (Aug-24)	CBRE (Aug-25)	CBRE (net of incentive)	PPE Min	CBRE Min	CBRE Min (net)
6-18 Hull Street	Student Roost	£229	£189	£169	£287	£229	£155
Foss Studios	Hello Student	-	-	-	£260	£255	-
Walmgate	Student Castle	£220	£228	£228	-	£295	-
Hallfield Road	iQ	£190	-	-	£316	£301	£291
2-14 George Hudson Street	Primo Property	-	-	-	£175	-	-
Lawrence Street	Vita	£243	£260	£260	£341	£292	£292
Lawrence Street	Hello Student	£230	-	-	£300	£322	£322
Coal Yard	Prestige	£234	£198	£198	£299	£249	£249
Frederick House	Student Roost	£215	£175	£155	£259	£199	£179
Abode	Homes for Students	-	£199	£199	-	£249	£249
Mean weekly rate (£/wk)		£222	£208	£201	£278	£266	£248

Source: CBRE Research

* Minimum displayed to align with PPE's methodology to derive the market rent

- vii. As of 13th August 2025, cluster rooms and studios are being advertised at average rents of £208 and £266 per week, resulting in a combined off-campus rate of £237 per week. This reflects a lower growth of 8.5% year-on-year from the 2023 Addendum. CBRE notes that the average weekly advertised rents for en-suite rooms are 7% lower in August 2025 than in August 2024. Similarly, the average weekly rent for Studios is 4% lower than in August 2024.
- viii. The analysis indicates that the evidence base appears to have overstated the market rent for PBSA. This is likely due to dynamic pricing models employed by PBSA operators, from sector forecasts⁵ indicate stabilizing rental growth in 2025, rather than any contraction.
- ix. CBRE further notes that several schemes are currently offering incentives for tenants, with monetary values ranging from £500-£1,000 in some instances. CBRE has therefore calculated the impact of these incentives on the weekly rate (assuming a 51 week tenancy), which indicates a current average rent of incentives reflecting £201 per week for en-suite rooms, and £248 per week for studios. Whilst this indicates dampened demand, CBRE is cautious to adopt these lower rents, given the prevalence of dynamic pricing within the PBSA market.
- x. CBRE has cross checked this against CBRE's internal tracking for PBSA rents in York, which records advertised rents for schemes on a quarterly basis, offering a more robust sample.

5 <https://content.knightfrank.com/research/169/documents/en/uk-student-housing-q1-2025-12116.pdf>

Average rates for en-suite rooms and studios are £201 per week, and £270, respectively, which indicates a blended rent of £237 per week.

- xi. It is CBRE's view that this rate is a more robust representation of the rental tone in York and recommends its adoption in the viability testing.
- xii. Regarding the adopted yield, in previous representations, CBRE had set out investment transactions, as follows and demonstrating a tone of circa 5.5%-6.5% NIY and capital value of circa £90,000-£100,000 per bed:
 - 1. 3 James Street: comprising 303 beds transacted in June 2023 on a forward fund to S Harrison at a yield of 5.50% to 5.75%.
 - 2. 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.
 - 3. 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.
 - 4. Foss Studios: comprising 220 beds transacted in 2017 on a stabilized investment basis at a NIY of 5.7%, reflecting £106,000 per bed.
- xiii. Subsequently, CBRE highlights the following property currently on the market:
 - 1. The Coal Yard, Mansfield Street, a 189 unit stabilised scheme marketed in 2024 with guide price of £27,800,000 on a yield of 5.25%, reflecting a capital value per bed of £147,000. The property has subsequently been relisted. CBRE has been advised that the guide price reflects a yield of 5.75% currently. The property benefits from a nominations agreement with York St John's University.
- xiv. 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.
- xv. On the basis of the above, CBRE ranks York as a Prime Regional location for PBSA and understand that other agents such as Knight Frank regard the city on an equivalent basis. However, CBRE considers York to be marginally behind other Prime Markets, including Bristol, Cardiff and Exeter, where demand characteristics is stronger.
- xvi. CBRE has analysed several recent transactions in other Prime Regional locations for PBSA which are considered marginally stronger than York, where information is available. These demonstrate investment yield tones of 5.50-6.0% for stabilised assets:
 - 1. The Place, Nottingham: Comprising 409 beds purchased by L&G in April 2025 on a stabilised investment basis at a NIY of 5.50%, reflecting £110,000 per bed. The property was completed in August 2024.
 - 2. 5-8 London Road, Brighton, comprising 156 beds, purchased by M&G in December 2024 on a stabilised investment basis at a NIY of 5.35%, reflecting £240,000 per bed.
 - 3. The Neighborhood, a portfolio of two schemes in Cardiff and Exeter totaling 400 beds, purchased by Greystar in January 2025 on a stabilised investment basis at a NIY of 5.60%, reflecting £150,000 per bed.

- xvii. On the basis of the transactions above, 'best-in-class' in York would currently indicate 5.25%. CBRE's capital markets specialists have advised that this would be an institutional specification; high quality specification, well located, and with a lot-size of £40-60 million.
- xviii. The above evidence suggests that the adopted capital value per bed of £160,000 and a yield of 5.25% utilised within the CIL Viability Addendum actually exceed transactional evidence available for York in recent years., and stronger locations in the current market.
- xix. PBSA prime regional (direct let) stabilised investment yields have remained stable in 2025. The latest available investment yield sheets now record Prime Regional PBSA yields for stabilised asset as follows:
 - 1. Knight Frank Prime Yield Guide – June 2025: PBSA Prime Regional at 5.0% - 5.25% (stable from Q1 2025)⁶.
 - 2. CBRE UK Living Sectors Investment Yields – August 2025: PBSA Prime Regional at 5.0% (stable from Q2 2025)⁷.
 - 3. Cushman & Wakefield – May 2025: PBSA Prime Regional at 5.25% (stable from Q1 2025).
- xx. In summary, respected agents all report PBSA Prime Regional stabilised yields stable at c. 5.25% at present day. Importantly, these are not development funding yields, but are stabilised investment yields, which do not account for development and stabilisation (letting) risk (i.e., transaction by a fund of a high specification stabilised standing PBSA asset).
- xxi. CBRE notes in the June Viability Addendum, table A4 that the quoted Knight Frank Prime Regional Yields are reported as 4.25%. CBRE notes that this reflects Prime Regional RPI leases, rather than Direct Let properties. RPI leases are a minority in regional PBSA markets, and as such the Direct Let Yield of 5.00-5.25% should be considered Knight Frank's relevant professional view for the purpose of CIL viability testing.
- xxii. 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 up to 50bps in comparison to stabilised investment yields. As a result, if the rates above are adjusted for development funding, this would see yields at 5.50%-5.75%, which is reflective of the recent forward funding deal in York at 3 James Street.
- xxiii. PPE has evidently not considered current PBSA investment evidence in York and has failed to reflect that forward funding is the key delivery route for financing PBSA schemes in the current market. Consequently, PPE is incorrectly overstating the GDV of the PBSA typologies.

c. Construction costs:

- i. The construction costs adopted are set out in Table A6. (CIL Viability Addendum, page 5) are cited as being drawn from RICS BCIS. The RICS BCIS median cost is cited as £2,253/m² (£209/ft²) and base-dated at Q1 (i.e. Jan-March) 2025. It is stated that this matches the

⁶ Note: this is provided within **Enclosure 2**.

⁷ Note: this is provided within **Enclosure 2**.

timescales for the 'sales values'. CBRE assumes this should read 'rental comparables', but would welcome clarification.

- 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 26 July 2025. On an equivalent basis the BCIS median cost now stands at £2,252/m² (£209/ft²), which is a decrease of 0.5%. The data is provided within **Enclosure 4**.
- iii. CBRE comment that the RICS BCIS costs of £2,252/m² (£209/ft²) are extremely low in the context of off-campus developer / operator led PBSA developments being brought forward for delivery in regional cities in the current market. CBRE also 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), which prudent developers have been told by the Government to design into schemes.
- iv. In **Table 4** overleaf, CBRE has set out both a comparison between the RICS BCIS median rate costs as at Q1 2023 and July 2025. CBRE considers these costs to be more likely representative of construction to a low-mid specification product, which would achieve a lower than average (i.e. more affordable) rental price point in the York market than that adopted by PPE. 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 £238/week) or above.
- v. CBRE notes that even the RICS BCIS upper quartile rate (£2,437/m² | £226/ft²) generates a construction cost which remains significantly below the level of costs being seen for mid-market specification PBSA schemes in the regions (i.e., circa £100,000 per bed). This is provided for comparison against the RICS BCIS median rate in **Table 4**.
- vi. CBRE can provide up to date benchmarking evidence on construction costs for recently tendered PBSA schemes of 400+ beds. The construction costs have been indexed from the contract award date to present day (Q3 2025) in order to reflect inflation during the intervening period.
 1. Nottingham scheme of circa 550 beds: £251/ft² (July 2023, similar date to the CIL viability evidence base) adjusted using BCIS All-in TPI to Q3 2025 £257/ft²
 2. Liverpool scheme of 400-500 beds: £248/ft² (June 2023, similar date to the CIL viability evidence base) adjusted using BCIS All-in TPI to Q1 2025 £261/ft²
- vii. This benchmarking evidence suggests that even the RICS BCIS upper quartile rate is unrealistically low and developers are facing significantly higher construction costs for PBSA schemes.
- viii. For the reasons set out above, CBRE strongly advocates that the RICS BCIS upper quartile rate should represent the **absolute minimum** base construction cost for generic 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. PPE's use of an unrealistically low construction cost will erroneously state the viability of the PBSA typologies tested.

Table 4: Comparison Analysis | RICS BCIS Costs Q1 2025 vs. Q3 2025 vs. Minimum Market Rates (CBRE Q3 2025)

Based on PPE's gross to net efficiency of 65.0%

RICS BCIS Median Q1 2025		Build		External Works		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	£/Bed	Cost (£)
2,253	209.3	18,462	41,593,846	600	69,323		4,159,385	6,932	45,753,231
									£/m2
									2,478
2,253	209	10,769	24,263,077	350	69,323		2,426,308	6,932	26,689,385
									£/m2
									2,478
2,253	209	6,154	13,864,615	200	69,323		1,386,462	6,932	15,251,077
									£/m2
									2,478
2,253	209	3,077	6,932,308	100	69,323		693,231	6,932	7,625,538
									£/m2
									2,478

RICS BCIS Median Q3 2025		Build		External Works		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	£/Bed	Cost (£)
2,219	206.2	18,462	40,966,154	600	68,277		4,096,615	6,828	45,062,769
									£/m2
									2,441
2,219	206.2	10,769	23,896,923	350	68,277		2,389,692	6,828	26,286,615
									£/m2
									2,441
2,219	206.2	6,154	13,655,385	200	68,277		1,365,538	6,828	15,020,923
									£/m2
									2,441
2,219	206.2	3,077	6,827,692	100	68,277		682,769	6,828	7,510,462
									£/m2
									2,441

RICS BCIS Upper Quartile Q3 2025		Build		External Works		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	£/Bed	Cost (£)
2,417	224.55	18,462	44,621,538	600	74,369		4,462,154	7,437	49,083,692
									£/m2
									2,659
2,417	224.55	10,769	26,029,231	350	74,369		2,602,923	7,437	28,632,154
									£/m2
									2,659
2,417	224.55	6,154	14,873,846	200	74,369		1,487,385	7,437	16,361,231
									£/m2
									2,659
2,421	224.92	3,077	7,449,231	100	74,492		744,923	7,449	8,194,154
									£/m2
									2,663

Source: RICS BCIS / CBRE Data

Table 5: Comparison Analysis | RICS BCIS Costs Q1 2025 vs. Q3 2025 vs. Minimum Market Rates (CBRE Q3 2025)

Based on corrected gross to net efficiency of 60.0%

RICS BCIS Median Q1 2025		Build		External Works		Total Costs (Build + External)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	10% £/Bed	Cost (£)
2,253	209.3	20,000	45,060,000	600	75,100		4,506,000	7,510	49,566,000
									82,610
2,253	209	11,667	26,285,000	350	75,100		2,628,500	7,510	28,913,500
									82,610
2,253	209	6,667	15,020,000	200	75,100		1,502,000	7,510	16,522,000
									82,610
2,253	209	3,333	7,510,000	100	75,100		751,000	7,510	8,261,000
									82,610

RICS BCIS Median Q3 2025		Build		External Works		Total Costs (Build + External)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	10% £/Bed	Cost (£)
2,219	206.2	20,000	44,380,000	600	73,967		4,438,000	7,397	48,818,000
									81,363
2,219	206.2	11,667	25,888,333	350	73,967		2,588,833	7,397	28,477,167
									81,363
2,219	206.2	6,667	14,793,333	200	73,967		1,479,333	7,397	16,272,667
									81,363
2,219	206.2	3,333	7,396,667	100	73,967		739,667	7,397	8,136,333
									81,363

RICS BCIS Upper Quartile Q3 2025		Build		External Works		Total Costs (Build + External)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds	£/Bed	@	Cost (£)	10% £/Bed	Cost (£)
2,417	224.55	20,000	48,340,000	600	80,567		4,834,000	8,057	53,174,000
									88,623
2,417	224.55	11,667	28,198,333	350	80,567		2,819,833	8,057	31,018,167
									88,623
2,417	224.55	6,667	16,113,333	200	80,567		1,611,333	8,057	17,724,667
									88,623
2,417	224.55	3,333	8,056,667	100	80,567		805,667	8,057	8,862,333
									88,623

Source: RICS BCIS / CBRE Data

d. Contingency:

- i. The contingency rate adopted within the CIL Viability Addendum 2025 is maintained at 4.00%. Whilst PPE acknowledge that contingency is “*understood to be in the region of 3% to 5% of build costs plus externals*”⁸. PPE has apparently taken a ‘midpoint’ of 4.00% without providing any explanation of the relevance to varying development typologies and, greenfield and brownfield sites. In Section 5 of the Cil Consultation Statement, CYC and PPE resist CBRE’s recommendation to increase the contingency to 5% of build costs for brownfield sites, stating: “*it is not necessary to include a contingency rate within high level studies such as this.*”
- ii. In CBRE’s view, this response does not address the previous representations. CBRE’s position remains that this an unreasonably low allowance for brownfield sites in York. Such sites include significant site preparation works such as demolition of existing buildings and remediation. Redevelopment of brownfield sites therefore carries a greater level of risk in comparison to greenfield sites and often uncover additional costs to construction at commencement or during the development Programme. Moreover, brownfield sites in York commonly have a number of constraints including (or within close proximity to) listed buildings, an Area of Archaeological Importance and/or a conservation area.
- iii. As a cross check, CBRE has reviewed recent local plan evidence from nearby councils. CBRE notes that the Durham County Council Local Plan Viability Testing – Update, Date October 2023, CP Viability adopt a 5% contingency on build costs, externals and Part L costs for brownfield sites, in order to account for the increased construction risks experienced on such sites.
- iv. CBRE also notes that in the recent Planning Approval for a PBSA scheme at Coney Riverside, (planning ref: 22/02525/FULM) a contingency of 5% was agreed with the council’s reviewer during viability negotiations.
- v. CBRE is therefore of the opinion that the contingency rate for brownfield sites should be adjusted upwards from 4.00% to 5.00% to reflect an adequate allowance for contractor’s and developer’s risk in a city with known contingency issues.

e. Abnormals:

- i. The CIL Viability Addendum applies costs related to ‘abnormals’ within the brownfield land typology appraisals at £400,000 per net hectare and within the mixed greenfield/brownfield land typology appraisals at £200,000 per net hectare.
- ii. The CIL Viability Study references that these ‘high-level’ demolition and land remediation costs are informed by Homes England (formerly the HCA) guidance dated 2015⁹. CBRE has researched this guidance and it appears the publication was withdrawn on 24 May 2022. It therefore brings to question whether the CIL Viability Addendum should also rely on information withdrawn from the public domain and which provides out of date cost information, particularly given the high inflation environment impacting build costs since the date of publication (circa 8-9 years ago).

⁸ CIL Viability Study (December 2022)

⁹ Homes & Communities Agency, Guidance on dereliction, demolition and remediation costs (March 2015)

- iii. Nevertheless, it is also unclear how CYC has calculated the abnormal costs from the information set out in the Homes England guidance note or whether appropriate indexation has been applied to the costs (up to present day) to reflect significant cost inflation in recent years.
 - iv. CBRE has analysed the abnormal costs adopted within the CIL Viability Addendum for PBSA. These costs range from £20,000 to £652,000 based on site areas of between 0.05 and 1.63 net hectares.
 - v. Taking a stand back approach, this level of costs is unrealistically low and does not provide sufficient allowance for the abnormal costs associated with redevelopment of a brownfield site in York.
 - vi. CBRE has analysed the abnormals associated with the redevelopment of a number of brownfield sites in York. The abnormals costs cited include items such as demolition of existing buildings, site clearance, flood defence works, archaeology works, public realm, listed building works and conservation area. Other abnormal costs include land remediation.
 - vii. The abnormal costs cited by developers are significantly higher than the rates adopted within the CIL Viability Addendum. CBRE therefore requests that clarification is provided by PPE / CYC as to the methodology used for calculating site abnormal costs and whether the costs have been indexed appropriately.
- f. **Development Programme:**
- i. The CIL Viability Addendum does not set out a clear, detailed cashflow outlining development expenditure, finance roll up and revenue over the assumed development programme. The information provided is considered insufficient to undertake a detailed analysis of PPE's cashflow. CBRE requests that this information is provided by CYC to provide transparency and clarity to stakeholders.
- g. **Site Areas for Typologies:**
- i. It is not clearly stated within the CIL Viability Study or CIL Viability Addendum 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 provide transparency and clarity to stakeholders.
- h. **Benchmark Land Value:**
- i. The CIL Viability Addendum 2025 maintains the PBSA BLVs as follows:
 - 1. A BLV of **£450,000/ha (£182,000/acre)** for on campus PBSA on the basis that on campus PBSA is likely to occur only at Campus East where greenfield sites exist. This is the same rate as for greenfield residential testing.
 - 2. A BLV of **£1.5m/ha (£607,000/acre)** for off campus PBSA based on the assumption of *"city centre residential developments on brownfield sites considered no longer fit for purpose for their existing use"*¹⁰.

¹⁰ CIL Viability Addendum (November 2023)

- ii. The previous representations made by CBRE queried the logic of differentiating BLVs by future use. This indicates an element of 'hope value', which is explicitly excluded in PPG Paragraph 015. 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 as to the adopted BLVs 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. There remains 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 therefore remains unclear on the logic behind the BLVs in the CIL Viability Addendum, which have been extracted from the appraisals and reiterated in **Table 6** below. It sets substantially lower BLV for PBSA development in comparison to competing uses such as small local convenience and retail warehouse (both £2m/ha).

Table 6: CIL Viability Study & CIL Viability Addendum | Non-Residential BLV

Typology	BLV per gross area (hectares)
Retirement / Extra Care (Urban)	£1,120,000
Retirement / Extra Care (Village/ Rural)	£900,000
Small local convenience	£2,000,000
Retail warehouse	£2,000,000
On Campus PBSA	£450,000
Off Campus PBSA	£1,500,000

- vi. In addition, CBRE also notes that the CIL Viability Addendum adopts a BLV for residential typology viability testing of £1.7m/ha for brownfield land in its existing use as 'City centre / extension' land in Appendix A15.
- vii. The CIL Viability Study 2025 does not adequately justify why competing brownfield land uses have been viability tested against a higher BLV and PBSA against a lower BLV.
- 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. CBRE had made previous representations, providing recent market transactional analysis of sites brought forward for PBSA in recent years, in order to consider a higher BLV, as set out below:
1. 3 James Street, York: In September 2022, the 0.92-acre site was acquired by 77 York Limited for £4,040,200 (£4,391,522/gross acre). 303-bed PBSA scheme (planning ref: 22/00367/FULM).
 2. Fawcett Street, York: In June 2022, the 0.40-acre site was acquired by L&S York Ltd for £2,800,000 (£6,975,651/gross acre). 85-bed PBSA scheme (planning ref: 21/01570/FULM).
 3. The Coal Yard, Mansfield Street, York: In May 2018, the 0.38-acre site was acquired by Residential Capital (York) Ltd for £814,000 (£2,145,223/gross acre). Over 100-bed PBSA scheme (planning ref: 17/02702/FULM).
- x. CYC and PPE's response within the Consultation Statement did not address the setting of BLV. Rather PPE states that *"the sighted land value that CBRE provide .. does not inform us if the price paid is the minimum that the landowner would sell a site for after excluding hope value"*. CBRE queries the intent of this statement, as logically, no market transaction for a brownfield site would be able to 'minimum price that the landowner would sell' at.
- xi. CBRE continues to recommend that CYC seek to justify their disaggregated BLV pricing, and to source and consider such evidence in taking a 'stand back' approach and a York-specific market sense-check, and consider stratifying BLVs based on location, rather than potential future use, such as not to overstate the viability positions.

Results & Re-appraisal

54. The CIL Viability Addendum (2025) sets out the results of viability modelling within Table A7 on p.6. This is replicated below for ease.

Table A7 Off campus PBSA development viability and the psm CIL liable floorspace headroom

Typology	Headroom per CIL liable sqm	
	Addendum Nov 2023	Addendum Jun'25
10a: Student accommodation - 25 beds	£494	£1,391
10b: Student accommodation - 100 beds	£437	£1,311
10c: Student accommodation - 200 beds	£325	£1,175
10d: Student accommodation - 350 beds	£284	£1,115
10e: Student accommodation - 600 beds	£169	£975

55. CBRE notes that no viability appraisals are provided with the CIL Viability Addendum (2025) for validation and comment.
56. Table A7 presents PPE's headroom analysis which concludes that all off campus PBSA typologies can viably accommodate both CIL and an affordable housing OSFC contribution of £7,000 per student room as proposed under modifications published under CYC's Local Plan Policy H7: Off Campus Purpose Built Student Housing.

57. This is notwithstanding representations that the conclusions within Table A7 and the CIL Viability Addendum are not reflective of the full deterioration in market conditions over the past 3 years.
58. CBRE cannot support the levels of CIL headroom being identified within Table A.7 above for the PBSA typologies, for the reasons set out earlier within this representation.
59. For PBSA typologies only 25%-50% buffer is recommended for allowance in proposing the setting of the CIL charging rate at £150/m². CBRE considers this should be 50% at the very least across all typologies.

CBRE Updated Appraisal Modelling | Off-Campus PBSA Development (Private sector-led)

60. Given CBRE's analysis set out above firmly highlights both technical issues with the CIL Viability Addendum (2025) evidence base methodology and inputs, CBRE has run independent viability modelling on PBSA typologies to determine the implications for CIL headroom in the current market.

a. CIL Headroom Analysis | CBRE Modelling:

- i. In order to take a comprehensive approach, CBRE has utilised present-day input assumptions for off-campus (developer-led) PBSA development scheme typologies.
- ii. Firstly, CBRE has tested the off campus PBSA typologies with the adoption of the (absolute) minimum comparable room size for studios (at 20m²) in the York PBSA market along with an evidenced gross to net efficiency acceptable by CYC.
- iii. Secondly, CBRE has set the rental rates to £236/week to represent an average rate across the York market, representing a gross income of £11,560 per bed. OPEX is deducted at 30% of the gross annual rent to generate a net rental income. This is consistent with the CIL Viability Addendum inputs.
- iv. Thirdly, CBRE has capitalised the net rental income at a forward fund investment yield of 5.50%. 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 5.50% - 6.00% for prime regional locations, such as York. CBRE has taken an optimistic stance of adopting the lower end of this rate at 5.50%, which represents a strong / best case illustrative position.
- v. CBRE has increased the construction costs to reflect the BCIS upper quartile cost as published at July 2025. This is deemed the absolute minimum benchmark rate for current market construction costs for mid-market specification private-sector led PBSA schemes being brought forward in regional cities.
- vi. CBRE has additionally incorporated the cost of the affordable OSFC sought via Policy H7 (£7,000 per bedroom) and the Building Safety Levy at the Previously Developed Land rate (£15.81/m²), in line with the announcement of implementation from September 2026.
- vii. Finally, CBRE has adjusted the contingency allowance utilised in the CIL Viability Addendum modelling to reflect the higher figure referenced in the text of 5.00%.
- viii. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. As previously discussed, 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 Danehurst to prepare CYC's evidence. A headroom analysis is presented in **Table 7**, below. Appraisal summaries are provided within **Enclosure 5**.

Table 7: Headroom Analysis (for CIL) Incorporating Modified Policy H7 OSFC | Developer-led PBSA Development

Off Campus Typology	PBSA	Headroom		After Buffer of:		
		£/CIL Liable sqm	50%	33%	25%	
10b	100-bed	-38	-19	-26	-29	
10c	200-bed	-123	-61	-82	-92	
10d	350-bed	-155	-78	-104	-117	
10e	600-bed	-242	-121	-162	-182	

Source: CBRE

61. 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 CIL at any rate above £nil.

Residential

62. CBRE notes the following observations on the CIL Viability Addendum:

- a. **City Centre Development:** CBRE previously noted the unique characteristics of York City Centre as an archaeological area of importance, situated within the historic core conservation area, and suffering from widespread high flood risk, all of which constrain development and introduce additional costs. Under Section 5 of the CIL Consultation Statement, CYC & PPE state that *“a precise cost for archaeological allowance has not been included”* and reference allowances made for brownfield site clearance and remediation costs, professional fees, and contingency. CBRE has addressed these assumptions independently and do not consider these to adequately account for the elevated costs of development in the city centre, in comparison to the rest of the city.
- b. **Repurposing Existing Floorspace:** CBRE has previously highlighted CYC’s longstanding ambition to see the City make better use of the spaces it has, notably conversion of upper floor retail space, which is generally redundant, into residential. CYC’s ‘Our City Centre Vision’ (previously ‘My City Centre Vision’) explicitly sets out the objective to *“encourage re-use of the under-used upper floors of buildings through planning support and business rates approach”*. P.23 of the document also states: *“Floors above commercial units are significantly underused, dominated by storage for retail units and empty space. Introducing different and mixed uses to the centre will allow more of this space to be actively used, but conversions of these buildings are complex.”*
- c. As the ‘My City Centre Vision’ document notes, conversion of these buildings are complex for a myriad of reasons. Some of the most notable being: planning challenges around bins / bikes / noise, City Centre access restrictions, achieving sound attenuation between commercial and residential uses and working in buildings of which a significant proportion are listed and all within a conservation area.
- d. Whilst development costs associated with conversion schemes are typically lower than new-build developments, there are additional costs associated with the difficulties of these projects. Moreover, policy requirements, notably those relating to sustainability, are likely to be more challenging and costly to meet when working with heritage assets. In addition, conversion developments would typically command lower values in comparison to new-build developments. This reflects a unique typology which cannot be accurately captured under PPE’s assessment of brownfield typologies and is, therefore, not reflected in the CIL Viability Addendum.

- e. Upper floors for conversion represent an important part of the housing supply for the City going forward, particularly at this time when York, along with many City Centre retail destinations are going through a period of significant change given the ongoing effect that online shopping has had on physical retail offerings and the decline in large format retail generally. Furthermore, these conversion projects help secure the long-term future of York's heritage assets, meeting a key objective of the Local Plan and the NPPF.
- f. If upper floor residential conversions are to be encouraged to meet the undersupply of residential property in the City, this approach should be explicitly tested within the CIL evidence basis, fully accounting for the specific challenges of this development typology.
- g. It is not appropriate for CYC or PPE to infer that the in-use credit would be appropriate, as this would necessitate floorspace having been utilised for six continuous months in the three years prior to a planning permission being granted. Many such buildings and upper floor spaces are redundant and will have been empty for considerable periods, meaning they will not qualify from in-use credit from CIL liability.
- h. If upper floor residential conversions are to be encouraged to meet the undersupply of residential property in the City, this approach should be explicitly tested within the CIL evidence basis, fully accounting for the specific challenges of this development typology or should be excluded altogether from CIL liability (i.e. £0 rated).

Build-to-Rent & Co-Living

- i. As high-density, multi-family housing developments, Build-to-Rent ('BTR') and Co-Living schemes are increasingly contributing towards housing delivery in cities and towns across the UK. The BTR sector is driven by institutional investment, providing high-quality, amenity-rich homes for rent. This now represents an established market in the UK's biggest cities, and has contributed significantly to the regeneration of brownfield land within these urban locations.
- j. Co-Living is a more nascent residential sector, itself a sub-sector of the BTR market, which is growing at pace across the UK. In the regional markets, co-living is beginning to take footholds, with Manchester leading the way in terms of beds delivered, and pipeline developments are expected in both Sheffield and Leeds.
- k. Whilst the BTR and Co-Living sector is yet to be established in York, it is expected that this market will develop throughout the plan period. Under Policy H2 (Density of Residential Development) of the adopted York Local Plan, higher density residential development is supported within the city centre, particularly in proximity to a high frequency public transport corridor.
- l. CBRE is aware of MODA Living's application (Ref: 22/01281/REMM) for 392 no. BTR units at 'Heworth Green', as part of the wider Heworth Gasworks redevelopment, which was granted in November 2022 and represents the first pipeline scheme. CBRE understands that MODA began a search to find a funding partner in August 2024 and remains underway.
- m. Currently, York does not represent an institutional BTR location, and there are more attractive locations (e.g. Leeds) to institutional investors. As a result, the prospective investor pool is more limited and achievable yields, capital values, and forward funding opportunities are subsequently reduced. Any BTR / Co-Living developments which are brought forward may need to be delivered on the basis of a speculative debt-funded stabilise and exit model, which is not a feasible option for many developers.

- n. The CIL Viability Addendum has failed to consider the impact of the proposed residential CIL charge upon BTR / Co-Living developments specifically. Application of CYC's proposed residential CIL charge of £150/m² to BTR / Co-Living developments would place further viability challenges on such schemes, and likely hinder their delivery.
- o. Considering this, CBRE requests that PPE undertake a full assessment of viability for BTR and Co-Living typologies, taking into account the specific characteristics of construction, operation, and sale of these assets. CBRE reserves the right to comment on this matter further at a later date.
- p. **Grey Belt Sites:** In December 2024, under the Labour Government's revision of the NPPF, the concept of 'grey belt' land was formally introduced to define land in the Green Belt comprising previously developed land and/or any other land which does not strongly contribute to the following purposes of the Green Belt:
 - i. To check the unrestricted sprawl of large built-up areas;
 - ii. To prevent neighbouring towns merging into one another;
 - iii. To preserve the setting and special character of historic towns;
- q. Paragraphs 156-157 of the NPPF set out the 'Golden Rules' for residential development in the Green Belt. In relation to affordable housing, this requires the provision of:
 - i. Affordable housing which reflects either development plan policies produced in accordance with paragraphs 67-68 of the NPPF; or until such policies are in place, the policy set out in paragraph 157 of the NPPF.
- r. It is CBRE's understanding that, whilst the adopted York Local Plan does adopt differential affordable housing requirements for brownfield and greenfield developments, this was not produced in the context of, and therefore does not satisfy the requirements of, paragraphs 67-68. Therefore, affordable housing provision on Grey Belt sites in York must default to the policy set out in paragraph 157 as follows:
 - i. 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.
- s. In the context of supply side constraints in the housing market in York, Grey Belt sites will be increasingly important in supporting housing delivery going forward. Based on the affordable housing requirements of Policy H10 of the adopted York Local Plan, and in accordance with paragraph 157 of the NPPF, Grey Belt sites in York will be subject to affordable housing requirements of 35%-45%. This has significant negative implications on development viability which has not been appropriately assessed as a specific typology within the CIL Viability Addendum. CBRE requests that this assessment is undertaken by PPE.
- t. **Residential Values:**
 - i. **Geographical Pricing:** CBRE previously critiqued the use of a fixed average sales values across both York city centre and areas outside the city 'core'. Within Section 5 of the CIL Consultation Statement, CYC & PPE state *"we understand that there will be variance at the lowest level given the proximity of schools, parks and other factors that drive differences in prices, but our understanding from our consultations informing the viability testing is that prices do not vary so much that this would require different value area zones across York."*

- ii. CYC & PPE reference the sales evidence provided within Appendix A1 of the CIL Viability Addendum, stating that *“the data indicates that over half (54%) of the transactions are within \pm £500 psm of the average figure of £3,792. 72% are within when the sample is extended to \pm £750 psm”* and therefore claim that *“such differences are unlikely to be of significance given the considerable headroom identified and the excess of a buffer that is used when setting the proposed CIL rates.”*
- iii. CBRE would argue that a difference in average value of £500/m² (£47/ft²) to £750/m² (£70/ft²) is not insignificant and could translate to significant viability impacts, likely eroding the entire identified CIL ‘headroom’ in most cases.
- iv. Without access to the supporting appraisals, it is not possible to determine the potential viability impact of more granular geographical pricing and CBRE requests that this sensitivity analysis is undertaken by PPE.

u. **Construction Costs:**

- i. **Flatted / Apartment Costs:** The CIL Viability Addendum adopts the RICS BCIS (median) midpoint rate between flats 1-2 storey and flats 3-5 storey over a 15-year (default) period at a cost of £1,631/m² (£152/ft²) as at Q1 2025 for the construction of apartments across York. This reflects a 3.2% increase on construction costs adopted for the CIL Viability Addendum at Q2 2023. However, CBRE is of the opinion that this does not go far enough in fully reflecting inflation of construction costs during this period.
- ii. 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 the cost rate adopted within the viability modelling. It will substantially overstate the financial viability of flatted apartment development typologies.
- iii. CBRE has reviewed the latest RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, which represents a more up-to-date sample of tendered costs. On this basis, the RICS (median) midpoint rate between flats 1-2 storey and flats 3-5 storey equates to £1,885/m² (£172/ft²), which is an increase of 13% from PPE’s adopted rate. This supports CBRE’s view that the sample relied upon by PPE is overstating the financial viability of apartment developments within their assessment. The data is provided within **Enclosure 4.**
- iv. Furthermore, in the context of the unique characteristics of the City as an area of archaeological importance, within a historic core conservation area with a high concentration of listed buildings, and a vast high flood risk area, CBRE is of the opinion that the RICS BCIS Median rate underestimates the cost of development in the city centre. CBRE would advocate that the RICS BCIS upper quartile rate should represent the minimum base construction cost for generic viability testing developer-led residential typologies. On the basis of the RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, a midpoint between the lower quartile rates for flats 1-2 storey and flats 3-5 storey equates to £2,222/m² (£206/ft²), which is an increase of 36% from PPE’s adopted rate.
- v. **House Costs:** The CIL Viability Addendum adopts the RICS BCIS Estate Housing – Generally (median) rate of £1,441/m² (£134/ft²) for medium housebuilders (4-49 units) and the Estate Housing – Generally (lower quartile) rate of £1,274/m² (£118/ft²) for large housebuilders (50+ units).

- vi. CBRE has also cross-checked these rates against the latest RICS BCIS data published at 26 July 2025, with tenders restricted to the last 5 years, which represents a more up-to-date sample of tendered costs. On this basis, the Estate Housing – Generally (median) rate equates to £1,643/m² (£153/ft²) and the Estate Housing – Generally (lower quartile) rate equates to £1,380/m² (£128/ft²).
- vii. This indicates that the cost rates adopted within the viability modelling for houses is also unrealistically low, skewed by tenders which are no longer reflective of costs currently facing housebuilders. As such, the sample relied upon by PPE is overstating the financial viability of housing developments within their assessment.
- v. **Garages:** As discussed within paragraph 38a of this representation, The CIL Viability Addendum maintains a single garage cost of £9,000/unit. As previously highlighted by CBRE, the latest information provided to CBRE by housebuilders places the current cost at approximately £15,000 per single garage in 2025. Evidence of this from Yorkshire and the North West of England, indexed to Q3 2025¹¹, is summarised in **Table 9** below.

Table 9: CBRE Garage Cost Benchmarking

Site	Region	Cost Date	Avg Cost (excl. Abnormals)	Indexed Avg Cost (excl. Abnormals)
Site A	Yorkshire and the Humber	Jan-25	£14,164	£14,306
Site B	North Yorkshire	Jan-25	£15,180	£15,333
Site C	North West	Jul-25	£14,331	£14,331
Average			£14,559	£14,657

Source: CBRE

- i. As a result, the cost allowance in the CIL Viability Addendum is considered unreasonably low and not reflective of the construction costs facing housebuilders in the current market.
- w. **Other development costs:**
 - viii. **Contingency:** The contingency rate adopted within the CIL Viability Addendum is maintained at 4.00%. CBRE previously highlighted the elevated risk associated with the redevelopment of brownfield sites, particularly in York where constraints are multiple. Under Section 5 of the CIL Consultation Statement, CYC & PPE respond to this, stating “*in line with PPG Viability, it is not necessary to include a contingency rate within high level viability studies such as this.*” This fails to address the concerns raised by CBRE in previous representations.
 - ix. CBRE is aware of several recent evidence from Local Plan viability studies which adopt a contingency allowance of 5%. These are as follows:
 - a. Within the Oadby & Wigston Borough Council Community Infrastructure Levy Viability Study Stakeholder Workshop (June 2025), Aspinall Verdi adopted contingency at 5.0% for brownfield sites.

¹¹ Indexed using BCIS All-in TPI

- b. Additionally, within the Charnwood Borough Council Community Infrastructure Levy - Viability Study Stakeholder Workshop (May 2025), Aspinall Verdi adopted contingency at 5.0% for brownfield sites.
 - c. Birmingham City Council Birmingham Whole Plan Viability Assessment prepared by Aspinall Verdi in April 2024 adopts a contingency at 5.0% for brownfield sites.
 - d. Amber Valley Borough Council Local Plan Viability Assessment also prepared by Aspinall Verdi in February 2024 adopts a contingency at 5.0% for brownfield sites.
 - e. Durham County Council Local Plan Viability Testing Update prepared by CP Viability in October 2023 adopts a 5.0% contingency allowance for brownfield sites.
 - f. Ashfield District Council Whole Plan Viability Assessment prepared by NCS in March 2023 incorporates an allowance of 5.0% contingency with no differentiation between greenfield and brownfield sites.
- x. Within Yorkshire specifically, the latest CIL viability evidence produced relates to the Calderdale Council DCS, produced by Aspinall Verdi in June 2023. Aspinall Verdi adopt a 5% contingency allowance for brownfield sites.
 - xi. On this basis, there is clear evidence of consensus amongst professionals that 5% represents a reasonable contingency allowance for development of brownfield sites within the current market.
 - xii. Furthermore, CBRE notes that within the viability review of Helmsley Securities' application at 19 to 33 Coney Street (Ref: 22/02525/FULM), CYC's independent advisor, Stannybrook Property Consultants, accepted that a 5% contingency allowance was reasonable. This is a brownfield site within the City Centre, involving complex conversion of existing heritage assets. This indicates that CYC deem a 5% contingency allowance to be reasonable in site-specific circumstances on brownfield sites in York, and CBRE therefore questions why a reduced rate is advocated within this area wide assessment.
 - xiii. As such, CBRE maintains that the contingency rate for brownfield sites should be adjusted upwards from 4.00% to 5.00% to reflect an adequate allowance for contractor's and developer's risk.
- x. **Section 106 costs:**
 - i. The CIL Viability Addendum maintains the policy costs and Section 106 obligations assumed within the CIL Viability Study. These are extracted below for reference.

Table 4.13 Policy DM1/s106 costs per unit tested in this Addendum

Site	S106	Supplementary Education	Other key Infrastructure	Total cost	Cost per unit
Not Strategic Site specifics	£3,208,800	£3,112,461	£0	£6,321,261	£8,274
SS8 Land Adj Hull Road (ST4)	£886,200	£1,054,611	£1,000,000	£3,419,116	£13,000
SS9 Land East of Metcalf Lane (ST7)	£3,549,000	£9,992,240	£2,500,000	£16,041,240	£18,984
SS10 Land Nth of Monks Cross (ST8)	£4,065,600	£15,274,420	£3,000,000	£22,340,020	£23,079
SS11 Land Nth of Haxby (ST9)	£3,087,000	£12,955,738	£2,000,000	£18,042,738	£24,548
SS12 Land West of Wigginton Rd (ST14)	£5,661,600	£21,568,055	£11,900,000	£39,129,655	£29,028
SS13 Land West of Elvington Lane (ST15)	£14,023,800	£52,300,000	£74,900,000	£141,233,800	£42,295
SS14 Terry's Extension Sites (ST16)	£466,200	£0	£0	£466,200	£4,200
SS16 Land at Tadcaster Rd (ST21)	£663,600	£1,210,685	£0	£1,874,285	£11,863
SS18 Station Yard, Wheldrake (ST33)	£630,000	£1,777,059	£0	£2,407,059	£16,047
SS20 Imphal Barracks (ST36)	£3,229,800	£9,093,293	£0	£12,323,093	£16,025

Source: CYC, Key Infrastructure Requirements Updated Gantt [Exam doc: EX/CYC/70]

- ii. This demonstrates a total cost per unit ranging from £11,863 to £42,295 across the residential strategic sites. For non-strategic sites, PPE assume a blanket rate of £8,274/unit.
 - iii. CBRE notes that a significant proportion of these costs are driven by education contributions, which are underpinned by estimates of child yield. Different sites will generate different child yields, depending on the provision of family housing. As such, CBRE deems it is not reasonable to apply a single assumption for S106 education contributions to all site typologies.
 - iv. Residential developments delivering family housing, typically on greenfield sites, will be subject to a significantly higher education contribution, in comparison to a higher density non-family housing development. Considering the concerns raised within paragraph 53g of this representation regarding the elevated affordable housing requirement on Grey Belt sites, it should be considered that these sites are also likely to be subject to higher education contribution requirements, placing further pressure on development viability. When combined with CYC & PPE's proposed residential CIL rate of £150/m², this risks undermining the viability of these typologies.
 - v. Considering the variability and scale of S106 costs across the strategic sites, CBRE requests that PPE sensitivity test a range of education contributions to reflect a realistic variation and to ensure that the CIL Charging Schedule does not inadvertently stifle housing delivery.
- y. **BLV:**
- i. **Residential Typologies:** PPE formed opinions of residential land BLVs for the Local Plan viability assessment undertaken in 2018. Subsequently, for the purpose of the CIL Viability Study (December 2022), PPE reportedly used Savills Residential Land Value Index as a proxy to determine the change in current BLVs since the preparation of the Local Plan viability assessment.

- ii. As previously noted by CBRE, it appears that the CIL Viability Addendum does not rely on any new land transactional evidence since 2018. PPE has not sought to obtain up to date transactional evidence, which CBRE considers a significant oversight by PPE.
- iii. CBRE therefore remains unclear on the logic and relevance behind the BLVs adopted in the CIL Viability Addendum. The BLVs have been extracted from the residential appraisals and reiterated in table 10 below.

Table 10: CIL Viability Study & CIL Viability Addendum | BLV

Typology	BLV per gross area (hectares)
Residential (City Centre)	£1,700,000
Residential (Urban & Suburban)	£1,120,000
Residential (Village/Rural)	£900,000
Residential Agricultural /Greenfield	£450,000

Source: CYC

- iv. In previous representations, CBRE gathered market transactional evidence for sites brought forward for residential use as set out below.
 - 1. Eboracum Way, York: In December 2022, the 0.57-acre site was acquired by Modernistiq (Layerthorpe) Ltd for £2,900,000 (£5,102,669/gross acre). Residential scheme comprising 62 units (planning ref: 19/01467/FULM).
- v. Under Section 5 of the CIL Consultation Statement, CYC & PPE state *“the sighted land value that CBRE provide for the Eboracum Way scheme does not inform us if the price paid is the minimum that the landowner would sell a site for after excluding hope value, as is the criteria for setting BLV within PPG Viability.”* However, CYC & PPE fail to provide up-to-date transactional evidence to justify maintaining the rates set out in Table 10.
- vi. CBRE recommends that CYC seek to source and consider such evidence in taking a ‘stand back’ approach and a York-specific market sense-check.
- z. **Summary:** Overall, CBRE would advocate a cautious approach is taken by CYC to setting CIL rates in what continues to be a volatile housing market in 2025, particularly if CYC is minded to seek to maintain or increase levels of affordable housing provision as part of the overall housing supply.

Results & Re-Appraisal (Residential)

63. The CIL Viability Addendum sets out the results of the updated viability modelling within Table A3 on p.3. This is replicated below for ease.

Table A3 Viability of residential developments in CYC and their £psm CIL liable floorspace headroom

ID	Typology	Headroom per CIL liable sqm	
		Addendum Nov 2023	Addendum Jun'25
2	Centre/ City Centre Extension - Medium - 50 dwellings - Greenfield	£347	£100
3	Centre/ City Centre Extension - Small - 20 dwellings - Greenfield	£531	£279
4	Urban - Large - 45 dwellings – Greenfield	£335	£100
5	Urban - Medium - 25 dwellings – Greenfield	£366	£130
6	Urban - Small - 10 dwellings – Greenfield	£554	£373
7	Suburban - Large - 140 dwellings – Greenfield	£362	£140
8	Suburban - Medium - 38 dwellings – Greenfield	£290	£54
9	Suburban - Small - 8 dwellings – Greenfield	£499	£318
10	Village - Village - 122 dwellings – Greenfield	£245	£23
11	Village - Large - 33 dwellings – Greenfield	£298	£62
12	Village - Medium - 7 dwellings – Greenfield	£514	£333
13	Village - Small - 4 dwellings – Greenfield	£561	£380
14	Centre/ City Centre Extension - Large - 95 dwellings - Brownfield	£458	£240
15	Centre/ City Centre Extension - Medium - 50 dwellings - Brownfield	£514	£292
16	Centre/ City Centre Extension - Small - 20 dwellings - Brownfield	£561	£335
17	Urban - Large - 45 dwellings – Brownfield	£362	£150
18	Urban - Medium - 25 dwellings – Brownfield	£371	£158
19	Urban - Small - 10 dwellings – Brownfield	£487	£306
20	Suburban - Large - 140 dwellings – Brownfield	£421	£219
21	Suburban - Medium - 38 dwellings – Brownfield	£281	£68
22	Suburban - Small - 8 dwellings – Brownfield	£414	£233
23	Village - Village - 122 dwellings – Brownfield	£301	£99
24	Village - Large - 33 dwellings – Brownfield	£270	£57
25	Village - Medium - 7 dwellings – Brownfield	£416	£234
26	Village - Small - 4 dwellings – Brownfield	£463	£279
41	SS14 Terry's Extension Sites (ST16)	£310	£117
46	SS20 Imphal Barracks (ST36)	£363	£157

64. In paragraph 10, PPE state “despite the reductions in sales values and increases in build costs during the past 18 months in the City of York, all sites remain viable under the cumulative Local Plan policies in the current market.”
65. Table A3 presents PPE’s headroom analysis which concludes that all residential typologies can viably accommodate both CIL and the cumulative Local Plan policies, including 20% / 30% affordable housing, in the current market.
66. The headroom analysis maintains PPE’s previous conclusions that only Strategic Site 16 (‘SS14 Terry’s Extension Sites’) and Strategic Site 36 (‘SS20 Imphal Barracks’) can viably accommodate CIL.

67. It is evident that there has been a severe compression in the headroom based on PPA's updated viability evidence for almost all typologies tested.
68. This is notwithstanding representations that the conclusions within Table A3 and the CIL Viability Addendum are not reflective of the full deterioration in market conditions over the past 24 months.
69. CBRE cannot support the levels of CIL headroom being identified within Table A3 for residential typologies, for the reasons set out earlier within this representation.
70. On the basis of the levels of CIL headroom identified within Table A3, PPE state *"an average rate of £200 psm remains the highest amount that the generic sites could afford in the bulk of cases."* PPE apply a viability buffer of 25% to this to arrive at a CIL rate of £150/m² for non strategic residential sites.
71. Firstly, it appears that PPE's identified headroom of £200/m² reflects an average of the headroom identified for each residential typology tested (2 to 26). PPE's suggestion that, in the majority of cases, this reflects the 'highest amount' of CIL that the non-strategic sites could support is therefore incorrect.
72. On the basis of this flawed methodology, PPE apply a blanket residential CIL rate across all non strategic residential typologies, which reflect varying sizes and market contexts. Table A3 presents a number of residential typologies which PPE determine to generate a CIL headroom of less than £150/m² – these site typologies are medium and larger scale. On this basis, these typologies, which would be expected to account for a high provision of CYC's housing land supply would be unable to viably support the CIL charge proposed by PPE and would be rendered financially unviable.
73. It appears that many of the site typologies that demonstrate CIL headroom within Table A3 are limited to very small scale – frequently being 10 units or fewer.
74. Secondly, PPE state that *"a buffer of 25% is considered appropriate for setting CIL within the context of Planning Policy Guidance, which provides standard inputs, including the developer return, which guidance suggests should be between 15% and 20% of GDV, adjusting for risk, when establishing plan policies, including CIL."* CBRE notes that the PPG paragraph referenced by PPE (PPG Viability, Paragraph: 018 Reference ID: 10-018-20190509) provides guidance only on a reasonable allowance for developer's return and provides no guidance on viability buffers. CBRE notes that PPG advocates the application of a buffer in relation to CIL, however, appropriate levels of viability buffers are not explicit in the NPPF / PPG and should be based on a number of factors including local market conditions and development / delivery risk.
75. CBRE notes that within PPE's initial CIL Viability Study (December 2022), PPE included a 60% buffer, stating that *"the City of York is likely to soon have a Local Plan that will place non CIL funding obligations on future developments including new costs for meeting the Climate Emergency and affordable housing rates, which the development industry will need to absorb, and this might take time to bed in."* PPE also consider the context that *"there is also uncertainty in the economy that is currently heading into recession, and uncertainty in the planning system due to the current Government's narrative for introducing significant reforms."*
76. PPE acknowledges in their initial CIL Viability Study that a cautious viability buffer enables the marketplace to *"easily adjust to the new form of infrastructure funding along with the new Local Plan policies without coming forward to negotiate on viability grounds or amending or delaying delivery until they feel certain that it is worthwhile progressing with their current development proposal"*. It is evident in the CIL Viability Study that PPE view a higher viability buffer (60%) greater facilitates the delivery of homes, in the context of emergent legislation and Local Plan policy requirements. As such legislation and policies are now coming into effect, and PPE's CIL Viability Addendum (June 2025) indicates that viability has worsened through reduced values and rising costs, CBRE questions why PPE's stance on a reasonable viability buffer has shifted. It appears highly contradictory and represents a wholesale reversal of PPE's prior professional advice to CYC.

77. CBRE is aware of a research study¹² published by Lichfields planning consultants in August 2021, which presents analysis that indicates viability buffers ranged from 20-70% and noted higher buffers applied to larger and strategic sites.
78. CBRE considers that PPE's adopted viability buffer of 25% is beyond the lower end of expectations, particularly considering the trends in values and build costs observed by PPE, and given the technical deficiencies highlighted above. CBRE advocates that a viability buffer of 50%+ should be applied, in this context.
79. Regarding the two Strategic Sites assessed, PPE state that *"the updated viability results show them to have lower viability headrooms in the current market."* Following this, PPE state that *"the current proposed DCS rate of £100 psm would still result in viable developments, including a 17% viability buffer for ST16 and a 57% buffer for ST36."* On this basis, PPE claim that *"from this analysis, an appropriate rate for non strategic site delivery of residential dwellings at ST16 and ST36 remains at £100 psm."*
80. CBRE questions why, having stated that a 25% viability buffer is appropriate, PPE deems a 17% viability buffer to be acceptable for ST16. This is further undermined by PPE's view that a 57% buffer is appropriate for site ST36. Considering the underlying market dynamics and economic backdrop acknowledged both by PPE and CBRE, as outlined above, plus additional costs such as BSL, it is evident that a 17% viability buffer could easily be eroded and risk the viability of the scheme. As such, CBRE also advocates that a viability buffer of 50%+ should also be applied to all strategic sites, with any identified headroom for CIL adjusted downwards to accommodate this buffer, rather than the opposite.

CBRE Updated Appraisal Modelling | Residential

81. Given CBRE's analysis set out above firmly highlights both technical issues within the CIL Viability Addendum (2025) evidence base methodology and inputs, CBRE has independent viability modelling of a Residential typology to illustrate the implications for CIL headroom in the current market.

a. CIL Headroom Analysis | CBRE Modelling:

- i. CBRE has tested Typology 17 (Urban – Large – 45 Dwellings – Brownfield), against which PPE identify a CIL headroom of £150/m², reflecting an exact match of the recommended Residential CIL charge.
- ii. CBRE has increased the construction costs to reflect the BCIS Estate Housing – Generally (median) rate equates as published at July 2025, with tenders restricted to the last 5 years (£1,643/m² or £153/ft²). This is deemed an appropriate rate for medium housebuilders in the current market.
- iii. Secondly, CBRE has increased the construction cost of garages adopted within the CIL Viability Addendum modelling from £9,000 per garage to £15,000 per garage, reflecting the up-to-date evidence provided by CBRE.
- iv. Thirdly, CBRE has adjusted the contingency allowance utilised in the CIL Viability Addendum modelling to reflect CBRE's professional opinion of a reasonable rate of 5.00%.
- v. Finally, CBRE has incorporated the cost of Building Safety Levy at the previously developed land rate (£15.81/m²) to the open market floorspace delivered from October 2026, in line with the Government's anticipated implementation timeline.

¹² Lichfields (2021) Fine Margins, Viability Assessments in Planning and Plan-Making

- vi. 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 Danehurst to prepare CYC’s evidence.
- vii. CBRE adjusted appraisal of Typology 17 generates a Residual Land Value (‘RLV’) of £735,131, which falls below PPE’s identified BLV for this typology of £1,109,550. On this basis, Typology 17 is **unviable** and there is no headroom for CIL. A copy of CBRE’s Residential Appraisal is provided within **Enclosure 6**.
- viii. Evidently, the same adjustments to the other residential typologies would have an equivalent effect on viability and the headroom available to accommodate CIL. Considering that 11 of the 25 tested typologies are assessed by PPE to have CIL headroom equal to or below the recommended CIL charge of £150/m², CBRE’s modelling illustrates that a significant proportion of tested typologies would be unable to viably support CYC & PPE’s proposed residential CIL charge, in the context of current market conditions.
- ix. 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 Residential typologies to either meet the costs of CIL at any rate above £nil.

Failure to Strike an Appropriate Balance

- 82. In setting CIL rates, CYC 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)¹³, CYC 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.
- 83. As set out in PPG¹⁴, Charging Schedules should be consistent with, and support the implementation of, up-to-date relevant plans.
- 84. 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.
- 85. As also clearly set out in the RICS Guidance¹⁵, 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.
- 86. Moreover, CBRE concludes that it is illogical and counter-intuitive for CYC to introduce the proposed CIL rates for off campus PBSA and residential use development for the published CIL Viability Addendum 2025 document does not constitute up-to-date appropriate available evidence to underpin the proposed rates within the Revised CIL DCS.

¹³ CIL Regulations 2010 (as amended)

¹⁴ PPG CIL: Paragraph: 011 Reference ID: 25-011-20190901

¹⁵ RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14

87. As a result, Danehurst would strongly contend that the Revised CIL DCS is unsound and should not be endorsed by the Examiner for the above fundamental reasons and further technical deficiencies expanded upon below.
88. If non-compliance could not be rectified via modification(s) or by recommendation from the Examiner, the Examiner would be requested to reject the Revised CIL DCS in accordance with Section 212A(2) of the 2008 Act.

Lack of Transparency

89. There is a lack of transparency in the CIL Viability Addendum 2025 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 Guidance¹⁶ and RICS Professional Standards¹⁷, and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.
90. The CIL Viability Addendum does not provide corresponding appraisals and cashflows to evidence PPE's revised advice.
91. Without appraisals, it is not clear which assumptions have been adopted, maintained, or updated since the previous CIL Viability Addendum (November 2023). Furthermore, without associated cashflows, stakeholders are unable to see stabilisation and exit periods corresponding to gross development value ('GDV'), monthly apportionment of construction and other costs and finance roll-up.
92. This means the actual viability testing evidence utilised to set proposed CIL rates is not published in its entirety, not available to the examination (i.e. Inspector or stakeholders), and cannot be interrogated appropriately.
93. As CYC's evidence has been produced by a professional 'expert' ('PPE'), then the principles applying to the role of an expert in civil litigation should apply equally to a CIL examination. In *The Ikarian Reefer* [1993] F.S.R. 563 Cresswell J confirmed (p.565-566) that an expert must make available the evidence that has informed their opinion with that data to be shared upon publication of the relevant reporting. This principle should also apply to the preparation of evidence to inform a CIL examination, and yet CYC and PPE has not provided the viability testing/appraisal evidence.
94. The Courts have also held that it is a basic requirement of a consultation, if it is to be fair and useful, for respondents to be given access to the evidence that has informed the consultation proposals such that stakeholders can understand why the consulting body has reached the decisions made, and in turn to examine the evidence and judgements arising. Withholding such evidence in the process of examining the CIL Draft Charging Schedule prevents stakeholders from undertaking this basic activity and hence undermines the effectiveness and fairness of the process. It follows that the Inspector will also be deprived of the ability to interrogate the evidence in the process of examination.
95. Should the Inspector move to recommend adoption of the Revised CIL Draft Charging Schedule, given the above failings, the subsequent adoption would present a risk of being found to have been unlawful having arisen from a consultation and examination process that is procedurally flawed.

¹⁶ RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note

¹⁷ RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition

Conclusions and Recommendations

96. Danehurst cannot endorse or support the Revised CIL DCS, and its underpinning evidence base in the form of the CIL Viability Addendum 2025, as presently published.
97. In fact, for the reasons set out in this document and its enclosures, Danehurst has fundamental doubts regarding the appropriateness of the timing of this consultation on a new CIL DCS.
98. Danehurst 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 and residential use development within the Revised CIL DCS is reliant, and hence the legal compliance of the published Revised CIL DCS with the relevant legislation and guidance.
99. On this basis, Danehurst cannot agree with CYC that there is an appropriately evidenced and legally compliant basis upon which the Revised 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.
100. Danehurst therefore hopes that this feedback 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.
101. To rectify the issues identified, Danehurst advocate that the CIL rates proposed to apply to off campus PBSA development and residential development should be reduced to £0/m² via modification to the published Revised CIL DCS or CYC's pursuing of a CIL regime altogether held in abeyance until economic and property market conditions demonstrably improve.
102. If CYC does not take account of these recommendation, Danehurst 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.
103. Should CYC wish to engage directly with Danehurst 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	CL 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	Draft Charging Schedule Published	01/06/2023	Nine residential housing charging zones with rates of £0 to £50 per square metre for Greenfield residential sites, £0 per square metre for all brownfield residential sites. Residential institutions and care home development rate of £60 per square metre for both greenfield and brownfield sites, £0 per square metre charge for all other uses.	£0 per square metre for all other uses.	£0 per square metre for all other uses.
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	Abandoned	19/01/2021	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 CL. 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: York PBSA Comparable Schedule

Rental Market Data

Development	Developer	Development Description	Link	Date	Post Code	Address	Accommodation Type	Description	Term	m²	ft²	Rent PW (£)	Rent PA (£)	Net Rent PA(£)	Net Rent PW	Comments
Alcote	Homes for Students	communal lounge, games room	<div></div>	Aug-26	YO1 9PN	Percy's Lane, York	Studio	Twin Studio	51	30.0	323	£360	£16,360		£360	£2 x 34 beds
							Cluster Room	Classic En Suite	51		£199	£10,149	£199			
							Cluster Room	Classic En Suite	48		£208	£9,884	£208			
							Cluster Room	Deluxe En Suite	51		£215	£10,985	£215			
							Studio	Classic Studio	249	£260	£12,760	£260	recently refurbished			
Foss Studios	Hello Students	laundry, cinema, gym, bike room	<div></div>	Aug-26	YO10 3DU	321 Lawrence Street, York	Studio	Premium Studio	51	28.0	301	£275	£14,025		£275	recently refurbished
							Classic Studio	51		£255	£13,005	£255				
							Classic Studio	51		£270	£13,770	£270				
							Classic Bigger Studio	140		£189	£9,339	£189				
							Cluster Room	Bedroom Bronze (Shared 8	51		£177	£5,027	£177	£1000 cashback offer for 40+ weeks		
Frederick House	Student Roost	communal lounge, gym, games room	<div></div>	Aug-26	YO10 4EA	Fulford road, York	Cluster Room	Bedroom Bronze (Shared 8	51	10.0	108	£175	£8,925		£175	£1000 cashback offer for 40+ weeks
							Cluster Room	Bedroom Bronze (Shared 8	51		£175	£8,925	£175			
							Studio	Studio Bronze	51		£169	£10,149	£175			
							Studio Silver	Studio Silver	51		£219	£10,189	£169			
							Studio	Studio Gold	366	£280	£14,739	£280	£1000 cashback offer for 40+ weeks - Sold Out			
Lawrence Street	Viva	movie room, private study	<div></div>	Jun-24	YO10 3FT	Lawrence Street, York	Studio	Classic Studio	51	19.0	205	£340	£17,240		£340	
							Studio	Classic Plus Studio	51		£385	£18,105	£385			
							Studio	Deluxe Studio	51		£282	£14,892	£282			
							Studio	Accessible Studio	51		£388	£19,788	£388			
							Cluster Room	En Suite	161	£225	£13,225	£260				
Percy's Place	Hello Students	gym, cinema, study room, 100 bikes	<div></div>	Aug-26	YO1 9TP	1407 Percy's Place	Studio	Classic Bigger Studio	51		£322	£16,422		£322		
							Studio	Classic Smaller Studio	51		£285	£13,005	£244	Vouchers worth £270		
							Studio	Classic Bigger Studio	51		£270	£13,770	£259	Vouchers worth £271		
							Studio	Classic Bigger Studio (City)	51		£275	£14,025	£264	Vouchers worth £272		
							Cluster Room	En Suite	161	£189	£9,339	£169	£1000 cashback offer for 40+ weeks			
The Boulevard	Student Roost	high speed wifi, lake storage	<div></div>	Aug-26	YO10 3 LU	648 Hull Road, York	Cluster Room	En Suite	51	15.0		£1,072	£1,072		£250	£1000 cashback offer for 40+ weeks
							Cluster Room	En Suite Bronze	51		£199	£10,149	£179	£1000 cashback offer for 40+ weeks		
							Cluster Room	En Suite Bronze	44		£209	£9,196	£186	£1000 cashback offer for 40+ weeks		
							Cluster Room	En Suite Bronze Plus	51		£229	£10,679	£209	£1000 cashback offer for 40+ weeks		
							Cluster Room	En Suite Bronze Plus	44		£245	£10,780	£222	£1000 cashback offer for 40+ weeks		
							Cluster Room	En Suite Silver	51	18.0	194	£226	£11,985		£216	£1000 cashback offer for 40+ weeks
							Cluster Room	En Suite Silver	44		£249	£10,956	£225	£1000 cashback offer for 40+ weeks		
							Cluster Room	En Suite Silver Plus	51		£245	£11,435	£225	£1000 cashback offer for 40+ weeks		
							Cluster Room	En Suite Gold	51		£249	£11,699	£229	£1000 cashback offer for 40+ weeks		
							Studio	Studio Bronze	215	£229	£10,679	£209	£1000 cashback offer for 40+ weeks			
							Studio	Studio Bronze Plus	51	20.0	215	£235	£11,985		£216	£1000 cashback offer for 40+ weeks
							Studio	Studio Silver	51		£239	£11,989	£216	£1000 cashback offer for 40+ weeks		
							Studio	Studio Gold	51		£249	£12,699	£229	£1000 cashback offer for 40+ weeks		
							Studio	Studio Platinum	51		£269	£12,719	£249	£1000 cashback offer for 40+ weeks		
							Studio	Studio Gold Terrace	314	£259	£13,209	£239	£1000 cashback offer for 40+ weeks			
The Brickworks	O Student		<div></div>	Aug-26	YO17 7AU	Mansfield Street, York	Studio	Gold Studio	51	23.0	248	£301	£15,351		£291	£500 cashback
The Coal Yard	Prestige Student Living	high speed wifi, communal lounge	<div></div>	Aug-26	YO17 7AU	Mansfield Street, York	Studio	Standard Studio	51		£249	£12,699		£249	Sold Out	
							Studio	Gold Studio	51		£299	£15,249	£285	Sold Out		
							Studio	Platinum studio	51		£335	£14,335	£285			
							Studio	Silver Studio	51		£275	£14,025	£275			
							Cluster Room	Standard En Suite	44		£198	£8,712	£198			
Willington	Student Castle		<div></div>	Aug-26			Cluster Room	4 Bedroom Flat	51	15.2	164	£228	£11,628		£228	
							Studio	Roam	51		£278	£4,178	£278			
							Studio	Lensettir	51	239	£295	£15,045	£295			
							Studio		51		£270	£13,770	£270			
							Studio	Roam Deluxe	51							

Enclosure 3: Investment Yield Guides – Q3 2025

All yields remain unchanged. Supermarkets trending stronger due to depth of demand.

► **Retail**
High Street continues to show positive trends in best locations.

► **Out of Town Retail**
Cautious optimism remains.

► **Industrial**
Depth of interest remains although a large number of secondary logistics assets are due to be marketed post-summer.

► **Offices**
Strong demand for prime assets and realistically priced refurbishment opportunities especially in Central London markets.

Changes in red/ Last month in brackets

	Mar 2025 (%)	Apr 2025 (%)	May2025 (%)	Jun 2025 (%)	Aug 2025 (%)	Trend
OFFICES						
West End (Mayfair/St James's)	4.00	4.00	4.00	4.00	4.00	Stronger
West End Non-Core	4.75	4.75	4.75	4.75	4.75	Stronger
City of London	5.75	5.75	5.50	5.50	5.50	Stronger
M25/South-East	7.25	7.25	7.25	7.25	7.25	Weaker
Regional Cities	6.50	6.50	6.50	6.50	6.50	Weaker
Good Secondary	10.00	10.00	10.00	10.00	10.00	Weaker
Secondary	14.00	14.00	14.00	14.00	14.00	Weaker
INDUSTRIAL						
Prime Distribution	5.25	5.25	5.25	5.25	5.25	Stable
Prime Estate (Greater London)	4.75	4.75	4.75	4.75	4.75	Stable
Prime Estate (Ex Greater London)	5.00	5.00	5.00	5.00	5.00	Stable
Good Secondary	6.50	6.50	6.50	6.50	6.50	Stable
Secondary Estate	7.50	7.50	7.50	7.50	7.50	Stable

CBRE RESEARCH

	Apr 2025 (%)	May 2025 (%)	Jun2025 (%)	Jul 2025 (%)	Aug 2025 (%)	Trend
HIGH STREET SHOPS						
Prime	6.75	6.75	6.50	6.50	6.50	Stronger
Good Secondary	9.00	9.00	9.00	9.00	9.00	Stable
Secondary	12.00	12.00	12.00	12.00	12.00	Weaker
SUPERMARKETS						
Prime	5.00	5.00	5.00	5.00	5.00	Stronger
SHOPPING CENTRES						
Prime	8.25	8.25	8.25	8.25	8.25	Stable
Best Secondary	12.00	12.00	12.00	12.00	12.00	Stronger
Secondary	16.00	16.00	16.00	16.00	16.00	Stable
RETAIL WAREHOUSES						
Park – Prime – Open User	5.50	5.50	5.50	5.50	5.50	Stable
Park – Prime – Bulky User	5.75	5.75	5.75	5.75	5.75	Stable
Solus – Prime – Bulky User	5.50	5.50	5.50	5.50	5.50	Stable
Park - Secondary	7.25	7.50	7.25	7.25	7.25	Stable

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All sectors remain unchanged.



Investor sentiment remains strong primarily for value-add opportunities. Operationally, revenue inflation has slowed, and owners are working hard to maintain profit.

Changes in red/ Last month in brackets

	Apr 2025 (%)	May 2025 (%)	Jun 2025 (%)	July 2025 (%)	Aug 2025 (%)	Trend
LEISURE						
Prime Leisure Park	8.00	8.00	8.00	8.00	8.00	Stable
Good Secondary Leisure Park	12.00	12.00	12.00	12.00	12.00	Stable
Cinema Prime	8.50	8.50	8.50	8.50	8.50	Stable
Health & Fitness Prime	6.00	6.00	5.75	5.75	5.75	Stronger
HOTELS						
Prime London Vacant Possession	5.00	5.00	5.00	5.00	5.00	Stable
Prime London Management Contract	6.25	6.25	6.25	6.25	6.25	Stable
Prime London Lease	4.50	4.50	4.50	4.50	4.50	Stronger
Prime Regional Vacant Possession	7.50	7.50	7.50	7.50	7.50	Stable
Prime Regional Management Contract	8.50	8.50	8.50	8.50	8.50	Stable
Prime Regional Lease	5.00	5.00	5.00	5.00	5.00	Stronger

	Apr 2025 (%)	May 2025 (%)	Jun 2025 (%)	July 2025 (%)	Aug 2025 (%)	Trend
PUBS						
Prime London Corporate Pub	4.50	4.50	4.50	4.50	4.50	Stable
Prime Regional Corporate Pub	8.00	8.00	8.00	8.00	8.00	Stable
ROADSIDE & AUTOMOTIVE						
Car Showroom Prime RPI Lease	6.00	6.00	6.00	6.00	6.00	Weaker
Petrol Filling Station Prime RPI Lease	5.75	5.75	5.75	5.75	5.75	Stable
Car Park Prime RPI Lease	7.00	7.00	7.00	7.00	7.00	Weaker
FINANCIAL INDICATORS						
Base Rate	4.50	4.25	4.25	4.25	4.00	▼
5 Year Swaps	4.05	3.98	4.10	3.98	3.96	▼
10 Year Gilts	4.63	4.59	4.64	4.58	4.57	▼
RPI	3.40	3.20	4.50	4.30	4.40	▲
CPI	2.80	2.60	3.50	3.40	3.60	▲

Static yields, but stabilising rental growth in the Student Sector.



► Residential

Positivity drawn from increasing pipeline and investment activity, but limited evidence of prime assets trading. The increasing size of the pipeline indicates that market activity levels are increasing but it is unlikely that there will be any yield compression in the foreseeable future.

► Student

Investor optimism persists due to UCAS results, potential rate cuts and solid long-term sector fundamentals, but the September letting cycle is key. Rental growth is stabilising after years of strong performance. Incentives are being used to secure early occupancy, while others are holding out for a late and great surge of bookings. The September outcome may affect investor sentiment and yields.

	Apr 2025 (%)	May 2025 (%)	Jun 2025 (%)	Jul 2025 (%)	Aug2025 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	4.15	4.15	4.15	4.15	4.15	Stable
London Zone 2 Good Secondary	4.50	4.50	4.50	4.50	4.50	Stable
London Zone 3 to 6 Prime	4.25	4.25	4.25	4.25	4.25	Stable
London Zone 3 to 6 Good Secondary	4.50	4.50	4.50	4.50	4.50	Stable
South-East Prime	4.25	4.25	4.25	4.25	4.25	Stable
South-East Good Secondary	4.50	4.50	4.50	4.50	4.50	Stable
Regional Cities Prime	4.35	4.35	4.35	4.35	4.35	Stable
Regional Cities Secondary	4.75	4.75	4.75	4.75	4.75	Stable
Other Regional Centres Prime	4.50	4.50	4.50	4.50	4.50	Stable
Other Regional Centres Secondary	5.25	5.25	5.25	5.25	5.25	Stable

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	Apr2025 (%)	May2025 (%)	Jun 2025 (%)	Jul 2025 (%)	Trend
SINGLE FAMILY HOUSING					
South-East Prime	4.15	4.15	4.15	4.15	Stable
North-West Prime	4.35	4.35	4.35	4.35	Stable

HEALTHCARE

Care Homes Prime (Not for Profit)	4.75	4.75	4.75	4.75	4.75	Weaker
Care Homes Prime (SPV)	5.75	5.75	5.75	5.75	5.75	Weaker
Care Homes Secondary	8.00	8.00	8.00	8.00	8.00	Weaker
STUDENT ACCOMMODATION						
Central London Direct Let	4.25	4.25	4.25	4.25	4.25	Stable
Prime Regional Direct Let	5.00	5.00	5.00	5.00	5.00	Stable
Secondary Regional Direct Let	8.50	8.50	8.50	8.50	8.50	Stable
Central London RPI Lease	4.25	4.25	4.25	4.25	4.25	Stable
Prime Regional RPI Lease	4.25	4.25	4.25	4.25	4.25	Stable
Secondary Regional RPI Lease	5.50	5.50	5.50	5.50	5.50	Stable

MARKETBEAT INVESTMENT

MAY 2025

Better never settles

STEADY AS SHE GOES...

In terms of metrics, the first quarter was one of relative stability. We saw £13.4 billion transact. That means that rolling annual investment volumes remain at £55 billion – in line with where we were at the end of Q4. On a rolling basis, this is 29% up on last year, but on a quarterly basis just 1.7% up on the same period last year.

While there was widespread movement in the financial markets, as of the end of April, there was relatively little yield movement across prime markets, with stability remaining the case across 39 of our reported 45 markets over the last quarter. This leaves six markets where we have seen inward yield movement – with two in retail, three across offices and one in the living sector.

There was a very small reversion to negative yield impact across the MSCI Quarterly Index. However, capital values increased by 0.4% q-o-q, leaving quarterly total returns at 1.6%, while annual total returns were at 6.5%. All sub-sectors bar one (South East offices) are positive year-on-year. Shopping centres (10.7%) and retail warehouses (12.3%) continue to be the strongest performers, with industrial (9.2%) performing strongly.

...OR THE EYE OF A STORM?

This has all been against a backdrop of significant market volatility. As you'll pick up through our views across the sectors, there continues to be a 'wait and see' approach from investors on the trade and turmoil that we saw from the start of April. In a number of cases, this is playing out through a lack of investment stock coming to the market, and a variation of opinion on direction of pricing, as well as a polarisation across markets. Considering the volatility that we have seen, this is to be understood and may be for good measure, as we are starting to see an alleviation of the initial barriers laid out in early April.

For more information, we cover the impacts in more detail in our *Economy and Housing Marketbeat*.



Jason Winfield
Head of UK Capital Markets



Daryl Perry
Head of UK Research & Insight

KEY TAKEAWAYS



Q1 investment volumes were at £13.4 billion, leaving a rolling annual investment volume of £55 billion, 29% up on this time last year.



MSCI Capital values increased by 0.4% q-o-q, and are up 1.5% y-o-y. This leaves annual total returns at 6.6%.



According to our Prime Yield coverage, there was no movement during the month, with six of our 45 markets registering some inward yield movement over the last three months.



On 8th May, the MPC voted to cut the base rate to 4.25%, with a hawkish short-term view on inflation, and the prospects for short-term GDP growth.



There remains significant market volatility, impacting investor sentiment.



Martin Lay
Head of London Offices Capital Markets

CENTRAL LONDON OFFICES

Market Trends – With £2.56 billion transacting, Q1 2025 reported a 40% increase compared to the same period in 2024 and was 7% up versus the five-year quarterly average. However, just £900 million of assets have been brought forward in the City in the first quarter, meaning options for investors are limited. Yields remained stable at 5.75% for the City and 4.00% for the core West End for a fifth consecutive quarter.

Dynamics - Despite limited stock and transactional volumes, sentiment remains positive on net. Central London offices continue to generate demand across different sectors and profiles of buildings from a global audience, including American private equity firms, European and Israeli private investors, and Middle Eastern buyers. Short-income, value-add opportunities are also continuing to attract good interest.

Outlook – The outlook remains pegged on interest rate cuts later in the year. With positive indicators across the broader UK economy – despite international tariff-related turbulence – base rate cuts may release the handbrake on the market, offering greater confidence in pricing amongst prospective sellers and encouraging them to bring assets to market. In turn, this may potentially stoke an increase in volumes in the second half of the year.

BAROMETER DEAL



20 Manchester Square
Yield – 5.1% NIY
Price – c. £120m
Status – Sold
Comments – Brand new Grade A Office let to Lazard for 15 years. Purchased by Delancy



Jeremy Beckett
Head of National Offices Capital Markets

REGIONAL OFFICES

Market Trends – Q1 investment volumes across the regional markets totalled £296.7 million, representing a 61.2% decline from the previous quarter and 70.0% below the five-year quarterly average. This marked the lowest quarterly total since 2012.

Dynamics – Investor focus in regional markets remains firmly on best-in-class assets, exemplified by the landmark sale of EQ in Bristol for £104 million, which completed in January after exchanging at the end of Q4. The composition of capital sources is also shifting, with overseas investors - particularly from Israel and French SCPIs - now dominating the market, while US private equity has scaled back its presence. This was further illustrated by French real estate fund Iroko Zen's £27 million acquisition of the Brinell Building in Brighton.

Outlook – While anticipated rate cuts are expected to boost investor appetite, lower cost capital targeting prime deals is likely to remain opportunistic rather than allocated. Focus is expected to stay on the Big Six regional cities, particularly as supply continues to tighten and the development pipeline remains constrained in the near term. Edinburgh is likely to remain a key target for capital, with recent activity - such as Pontegadea's reported £7.5 million acquisition of Capital Square - highlighting its ongoing market premium relative to other regional cities.

BAROMETER DEAL



Capital Square, Edinburgh, EH3
Yield – 5.80%, with inbuilt reversion expected.
Capital Value - £615 psf
Status – Sold
Comments - Bought by Pontegadea – their second acquisition in Edinburgh.



Rory MacGregor
Partner, Life Sciences

LIFE SCIENCES

Market Trends – In Q1 2025, investment volumes in the Golden Triangle life sciences real estate market totalled £121.5 million across two transactions. While Q1 volumes reflect a 72% decline from the strong Q4 2024 finish, much of that activity was driven by deals agreed in earlier quarters and closed before year end.

Dynamics – The anticipated development pipeline, alongside a period of slower occupier take-up, has encouraged a more selective approach from investors toward new developments and secondary assets, as demand is expected to remain concentrated on best-in-class real estate. Even so, several significant lettings have contributed to a minor improvement in confidence in development, particularly within the core clusters where new build, best in class, assets are being delivered.

Outlook – With many investors holding substantial development pipelines, the short-to-medium-term focus is likely to remain on delivering these projects. This reflects a measured approach as investors navigate ongoing macroeconomic and geopolitical uncertainty, awaiting greater clarity on its direct impact on the life sciences real estate sector.

BAROMETER DEAL



270 Cambridge Science Park, Cambridge
Yield – 4.50%
Capital Value - £562.50 psf
Status – Sold
Comments – Brockton Everlast expanded Cambridge Science Park portfolio through this acquisition.



Ed Cornwell
International Partner, UK Logistics & Industrial Capital Markets

LOGISTICS & INDUSTRIAL

Market trends – Investment during the first quarter totalled £1.2bn across 40 deals, marking a notable step change relative to the large volume – just shy of £4bn – that had been recorded during Q4. In the first quarter, just four portfolios transacted, and the largest 5 deals accounted for half of the total Q1 volume.

Dynamics – Following what had been a year in which purchaser-vendor aspirations had been more closely aligned, the opening months of 2025 and early Q2 has pointed to a widening in price expectations. This comes as a result of uncertainty around financial markets, and questions with regard to the outlook for the occupier market which have reduced the pool of willing vendors. Competition for the limited pool of prime assets remains healthy with bid levels still healthy and pointing to continued confidence in the market. The addition of North American private equity to the buyer pool has helped support competitive tension, following a slight reduction in activity from institutional capital in recent quarters.

Outlook – Some larger properties and portfolios are gradually being introduced to the market which should sustain activity through 2025. However, we do not anticipate any significant structural changes, continued resilience in the occupier market will help to retain investor interest in the sector.

BAROMETER DEAL



Bedford Commercial Park, Bedford
Yield – c. 5.6%
Pricing – c. £100 million
Status – Marketing
Comments – Modern asset fully let to low risk tenants



Marcus Wood
International Partner, UK Retail & Leisure Capital Markets

RETAIL & LEISURE

Market trends – The retail investment market continues to see widespread positivity and consistent interest across all sub sectors. Investment volumes during 2025 so far remain modest, although this is largely a result of limited supply which in places is frustrating investors looking to deploy into the sector.

Dynamics – Transactions across the component sub-sectors remains mixed with some sub-sectors such as food-stores and shopping centres being impacted by limited levels of suitable supply. Despite this, the limited transactional evidence points to strong investor interest across both core and opportunistic markets. A handful of bellweather deals this year have helped to highlight the renewed interest in retail assets and a broadening of the buyer pool. The out of town market continues to see strong levels of activity, with Q1 volumes outperforming both last years Q1 value and the long term Q1 average.

Institutional capital has become increasingly comfortable in this market, with major players such as Hines now actively acquiring well connected schemes at a relative pace.

Outlook – Much of the current pipeline remains for stock launched during late 2024, meaning limited new supply may continue to weigh on volumes. However, a number of notable assets remain under offer which will likely help sustain the consistent positive sentiment seen already.

BAROMETER DEAL



Sears Retail Park, Solihull
Yield – 5.91%
Pricing - £70.5 million
Status – Exchanged
Comments – Starwood under offer to UK Institution



Ed Fitch
Head of Hospitality UK&I

HOTELS

Market trends – The first quarter of 2025 has been marred by uncertainty coming out of the US, but in spite of this, private equity investors remain interested in the sector. Momentum remains for larger deals (portfolios and key gateways), however local investors appear more hesitant to invest given the turbulent state of the economy.

Dynamics – There has been a steady flow of smaller individual assets coming to market as some larger portfolios rationalise non-core parts of their estate. Private owner-operators remain active and well-capitalised but cautious citing economic uncertainty and the impact of UK Government tax rises on operating costs.

Outlook – Investment volumes are likely to be constrained in the first half of the year by an ongoing mismatch between buyers and sellers, particularly in the regions. Major London opportunities remain scarce and may be expected to attract a deep pool of capital given perceived fundamentals.

BAROMETER DEAL



Confidential Portfolio, Various UK Locations
Yield – P&C
Size – C. 3,000 Beds
Status – Sold
Comments – Value-add Operating Platform



Peter Farnes
Head of Healthcare Investment

HEALTHCARE

Market Trends – So far in 2025 we have volumes of £854 million on the year to date, the largest of which was the Four Seasons Care Home sale. To date, 75% of the transactions have been undertaken by Healthcare Specialists, which shows their conviction to the sector. 66% of all transactions to date have been deployed from US capital which is showing no signs of slowing down.

Dynamics – The market as it stands is polarised, with the specialist investors looking to buy the best quality stock, looking for those A* assets with yields under 6.25%. At the other end of the market, large US based investors are looking for those value-add properties at the above 10% yield range. This leaves the mid-market as an opportunity for capital to deploy at 6.5% to 9.5%. We are seeing a number of potential take-private transactions with KKR potentially buying Assura and the US Care Trust REIT potentially purchasing the Care REIT.

Outlook – We will see the appetite for prime assets continue in both care homes and hospitals, but pricing and scale will be key. It remains to be seen how the US investors will react in the long term.

BAROMETER DEAL



Sherwood Grange Care Home, Kingston
Yield – P&C
Price – £14.2 Million
Status – Sold
Comments – Large leased portfolio of secondary care homes now under offer.



James Dunne
Head of Living

BUILD-TO-RENT

Market Trends – In Q1 2025, BTR investment reached £1.1 billion, representing an 11% year-on-year increase. Despite the combined impact of cost of debt and rising construction costs on viability, investors are actively exploring diversified entry strategies. Joint ventures, in particular, are becoming a more prominent feature of the market.

Dynamics – The sector continues to attract increasing volumes of capital, with a focus on core-plus and value-add strategies. Core capital remains largely sidelined, as macroeconomic uncertainty and a series of external shocks have delayed key investment decisions. There has been a noticeable rise in the availability of operational assets in regional markets, demonstrated by recent launches such as L&G's York & Elder in Brighton and LGIM's Whitmore Collection in Birmingham.

Outlook – Development remains the primary route to market for many investors. However, the pipeline of operational assets is expected to grow in 2025. While elevated debt costs have been a barrier for core capital, improvements in the debt environment are anticipated to support its gradual return to the sector.

BAROMETER DEAL



Equipment Works, London
Yield – TBC
Price - £126 million
Status – Sold
Comments - 257 Homes



James Woolley
Head of Student Accommodation

PBSA

Market Trends – Approximately £850 million has been transacted so far this year—below long-term averages but ahead of activity levels seen after the mini-budget. Around £2.5 billion worth of assets are currently being marketed, including Apollo's £600 million portfolio, Sanctuary's £500 million offering, as well as portfolios from Brookfield and Fusion.

Dynamics – Liquidity has improved, with a broader mix of capital sources including UK pension funds, institutional investors, and international capital. However, transaction timelines remain extended due to due diligence challenges, particularly those linked to the Building Safety Act, fire compartmentation, and cladding concerns. The proposed Renters Reform Act also poses a potential headwind for student accommodation. Nevertheless, key transactions continue to progress, including Rose Thorne and Barings' £101 million acquisition of Spring Mews in Vauxhall and M&G's £135 million forward funding deal with HG in Stratford.

Outlook– The outlook for the PBSA sector is more optimistic than last year, underpinned by a stronger occupational market and more realistic rental growth assumptions. Increased stock availability and diverse capital sources continue to support momentum.

BAROMETER DEAL

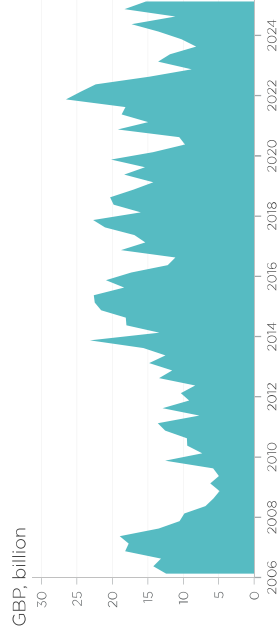


Project Wallace, Edinburgh & Glasgow
Yield – P&C
Price - £55.4 million
Status – Sold
Comments – Two-asset PBSA portfolio in Edinburgh (356 beds) and Glasgow (400 beds) in prime university locations.

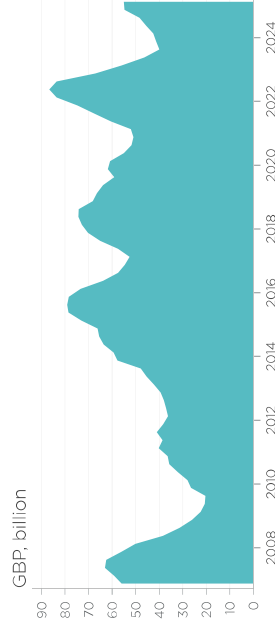
MARKET STATISTICS

Source: MSCI, Chatham Financial, Bank of England, Macrobond, Cushman & Wakefield

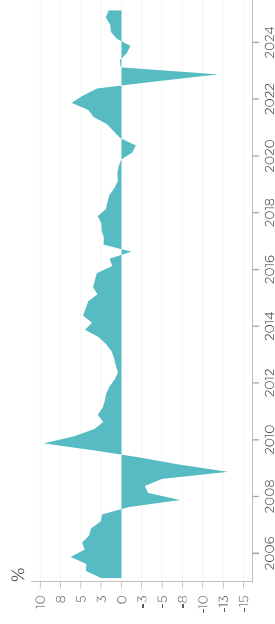
QUARTERLY INVESTMENT VOLUMES (BILLIONS)



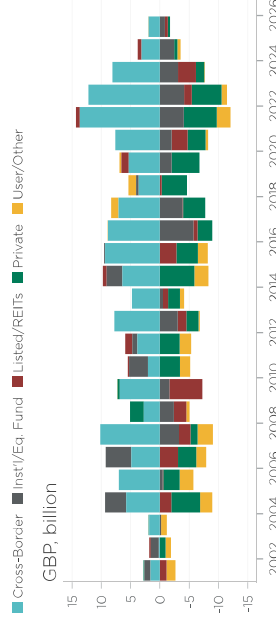
ROLLING ANNUAL INVESTMENT VOLUME (BILLIONS)



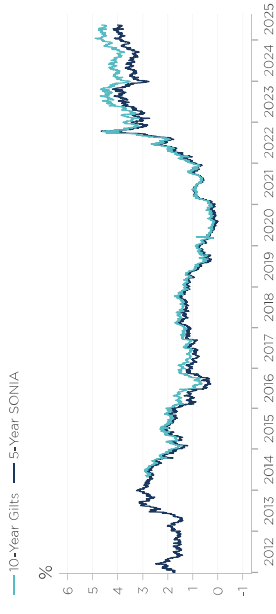
TOTAL RETURNS (%)



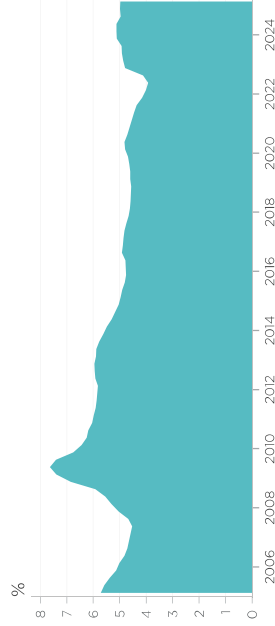
SOURCES OF CAPITAL



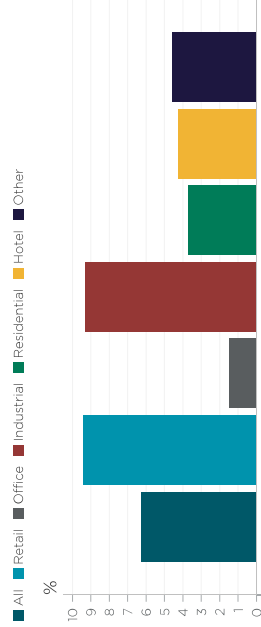
10 YEAR GILTS, 5 YEAR SONIA



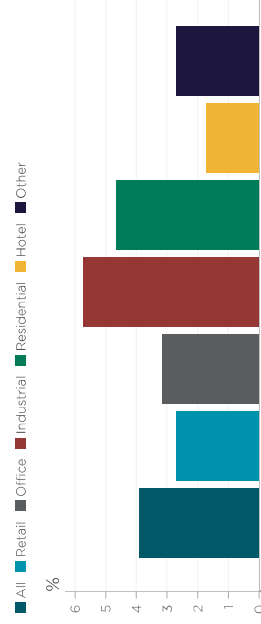
NET INITIAL YIELDS



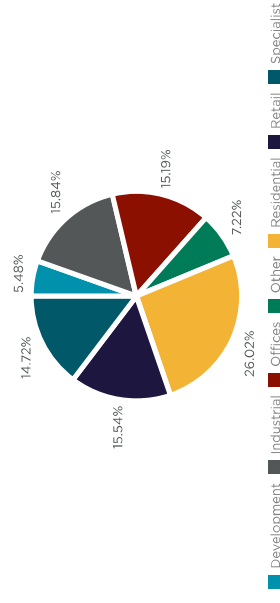
ANNUAL TOTAL RETURN BY SECTOR



ANNUAL AVERAGE RENTAL GROWTH BY SECTOR



ANNUAL INVESTMENT VOLUMES BY SECTOR



YIELD SCHEDULE

Sector	Sector	Previous Year	Previous Quarter	Previous month	Present	Annual Change (bps)	Quarterly Change (bps)	Monthly Change (bps)	Outlook
		May 24	Q1 25	Apr 25	May 25		Q-to-Q		
Town Centre Retail									
	Prime Retail Centres	7.00%	6.75%	6.75%	6.75%	-25 bps	0 bps	0 bps	Inwards
	Secondary Retail Centres	10.50%	10.00%	10.00%	10.00%	-50 bps	0 bps	0 bps	Inwards
	Prime London - West End	3.00%	3.00%	3.00%	3.00%	0 bps	0 bps	0 bps	Stable
Shopping Centres									
	Regional	8.00%	7.75%	7.75%	7.75%	-25 bps	0 bps	0 bps	Inwards
	Sub-Regional	11.00%	11.00%	11.00%	11.00%	0 bps	0 bps	0 bps	Inwards
	Local	12.00%	12.00%	12.00%	12.00%	0 bps	0 bps	0 bps	Inwards
Retail Warehouses (Greater London and SE in brackets)									
	Prime Open A1 Retail Park	5.75%	5.25%	5.25%	5.25%	-50 bps	0 bps	0 bps	Inwards
	Prime Bulky Park	6.25%	5.75%	5.75%	5.75%	-50 bps	0 bps	0 bps	Inwards
	Prime Supermarkets (RPI linked)	5.00%	4.75%	4.75%	4.75%	-25 bps	-10 bps	0 bps	Inwards
	Prime Solus (Bulky)	6.50%	5.75%	5.75%	5.75%	-75 bps	-25 bps	0 bps	Inwards
	Prime Leisure Parks	8.75%	8.25%	8.25%	8.25%	-50 bps	0 bps	0 bps	Inwards
Multi-Let Industrial									
	Prime Greater London	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Inwards
	Prime South East	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Inwards
	Prime Regional	5.25%	5.25%	5.25%	5.25%	0 bps	0 bps	0 bps	Inwards
Distribution Warehousing									
	Prime Long Income	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Inwards
	Prime Medium Income	5.50%	5.50%	5.50%	5.50%	0 bps	0 bps	0 bps	Inwards
	Prime Short Income	6.00%	5.75%	5.75%	5.75%	-25 bps	0 bps	0 bps	Inwards
In Town Offices									
	Greater London	7.00%	6.75%	6.75%	6.75%	-25 bps	0 bps	0 bps	Stable
	Prime City Offices	5.75%	5.75%	5.75%	5.75%	0 bps	0 bps	0 bps	Stable
	Prime West End Offices	4.00%	4.00%	4.00%	4.00%	0 bps	0 bps	0 bps	Stable
	Prime M25	7.25%	7.00%	7.00%	7.00%	-25 bps	0 bps	0 bps	Stable
	Prime Regional	7.00%	6.50%	6.50%	6.50%	-50 bps	-25 bps	0 bps	Stable
Out of Town Offices									
	Prime South East	8.25%	8.00%	8.00%	8.00%	-25 bps	0 bps	0 bps	Stable
	Prime Regional	9.25%	9.00%	9.00%	9.00%	-25 bps	-25 bps	0 bps	Stable

Sector	Sector	Previous Year	Previous Quarter	Previous month	Present	Annual Change (bps)	Quarterly Change (bps)	Monthly Change (bps)	Outlook
		May 24	Q1 25	Apr 25	May 25		Q-to-Q		
Co-living									
	Greater London	4.75%	4.50%	4.50%	4.50%	-25 bps	0 bps	0 bps	Stable
	Prime Regional	5.75%	5.00%	5.00%	5.00%	-75 bps	-25 bps	0 bps	Stable
Build to Rent									
	Prime London - West End	3.75%	4.00%	4.00%	4.00%	0 bps	0 bps	0 bps	Stable
	Greater London	4.25%	4.50%	4.50%	4.50%	0 bps	0 bps	0 bps	Stable
	Prime Regional	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Stable
Hotels									
	Prime London Fixed Income	4.75%	4.25%	4.25%	4.25%	-50 bps	0 bps	0 bps	Stable
	Prime Regional Fixed Income	5.50%	5.00%	5.00%	5.00%	-50 bps	0 bps	0 bps	Stable
	Prime London Trading	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Stable
	Prime Regional Trading	8.00%	8.00%	8.00%	8.00%	0 bps	0 bps	0 bps	Stable
Life Sciences									
	Golden Triangle	5.00%	5.00%	5.00%	5.00%	0 bps	0 bps	0 bps	Inwards
	Regional Centres	6.25%	6.25%	6.25%	6.25%	0 bps	0 bps	0 bps	Stable
Care Homes									
	Prime	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Stable
	Prime SPV	5.75%	5.75%	5.75%	5.75%	0 bps	0 bps	0 bps	Stable
Medical									
	Prime	4.50%	4.50%	4.50%	4.50%	0 bps	0 bps	0 bps	Stable
	Secondary	5.75%	5.75%	5.75%	5.75%	0 bps	0 bps	0 bps	Stable
Student Accommodation									
	Prime London	4.00%	4.00%	4.00%	4.00%	0 bps	0 bps	0 bps	Stable
	Greater London	4.75%	4.75%	4.75%	4.75%	0 bps	0 bps	0 bps	Stable
	Prime Regional	5.25%	5.25%	5.25%	5.25%	0 bps	0 bps	0 bps	Stable
Self Storage									
	Primary	5.00%	4.75%	4.75%	4.75%	-25 bps	0 bps	0 bps	Stable
	Secondary	6.00%	6.00%	6.00%	6.00%	0 bps	0 bps	0 bps	Stable
	Tertiary	7.00%	7.00%	7.00%	7.00%	0 bps	0 bps	0 bps	Stable



MARKETBEAT INVESTMENT MAY 2025

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Better never settles





Prime Yield Guide – June 2025

Knight Frank Intelligence

This yield guide is for indicative purposes only
and was prepared on 23rd June 2025.



Yields are reflective of an optimum sized income-focussed transactions of prime, stabilised institutional-grade assets. Yields are provided on a Net Initial Yield (NIY) basis assuming a rack rented property.

SECTOR	JUN-24	JAN-25	FEB-25	MAR-25	APR-25	MAY-25	JUN-25	1 MONTH CHANGE	MARKET SENTIMENT
 Student Property	Prime London - Direct Let	4.25%	4.25%	4.25%	4.25%	4.25%	4.25%		STABLE
	Prime Regional - Direct Let	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Prime London - 25 yr lease, Annual RPI	4.25% +	4.25%	4.00%	4.00%	4.00%	4.00%		STABLE
	Prime Regional - 25 yr lease, Annual RPI	4.50% +	4.50%	4.25%	4.25%	4.25%	4.25%		STABLE
 Co-Living	Prime London	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +		STABLE
	Prime Regional	5.00% +	5.00% +	5.00% +	5.00% +	5.00% +	5.00% +		STABLE
 Build to Rent	Zone 1 London Prime	3.90% +	3.90% +	3.90% +	3.90% +	3.90% +	3.90% +		STABLE
	Zone 2 London Prime	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +		STABLE
	Zones 3-4 London Prime	4.15% +	4.15% +	4.15% +	4.15% +	4.15% +	4.15% +		STABLE
	Greater London Prime	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +		STABLE
	South East Prime	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +	4.25% +		STABLE
	Tier 1 Regional Cities	4.50% +	4.50%	4.50%	4.50%	4.50%	4.50%		STABLE
	Tier 2 Regional Cities	4.75% +	4.75% +	4.75% +	4.75% +	4.75% +	4.75% +		STABLE
	South East – Single Family Housing	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +	4.00% +		POSITIVE
 Seniors Housing	Regional – Single Family Housing	4.50% +	4.50% +	4.50% +	4.50% +	4.50% +	4.50% +		POSITIVE
	Prime South East	5.25% +	5.25% +	5.25% +	5.25% +	5.25% +	5.25% +		STABLE

Your partners in property.

Prime Yield Guide – June 2025

Knight Frank Intelligence

*This yield guide is for indicative purposes only
and was prepared on 23rd June 2025.*



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- 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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Enclosure 4: RICS BCIS – Rebased to York - Q3 2025

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 26-Jul-2025 07:30

Rebased to 3Q 2025 (403; forecast) and York (96; sample 20)

MAXIMUM AGE OF RESULTS: 5 YEARS

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810.1 Estate housing							
Generally (5)	1,667	774	1,380	1,643	1,843	3,346	183
Single storey (5)	1,947	1,288	1,642	1,815	2,115	3,346	31
2-storey (5)	1,615	774	1,360	1,628	1,804	2,568	148
3-storey (5)	1,446	1,116	-	1,443	-	1,782	4
810.12 Estate housing semi detached							
Generally (5)	1,773	1,063	1,535	1,696	1,899	3,346	51
Single storey (5)	1,899	1,288	1,650	1,833	1,884	3,346	17
2-storey (5)	1,709	1,063	1,338	1,660	1,909	2,568	33
3-storey (5)	1,782	-	-	-	-	-	1
810.13 Estate housing terraced							
Generally (5)	1,496	891	1,315	1,381	1,724	2,076	11
2-storey (5)	1,534	891	1,346	1,455	1,760	2,076	10
3-storey (5)	1,116	-	-	-	-	-	1
816. Flats (apartments)							
Generally (5)	1,939	1,023	1,541	1,855	2,229	3,674	139

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
1-2 storey (5)	1,929	1,023	1,539	1,890	2,298	3,399	29	
3-5 storey (5)	1,919	1,031	1,541	1,820	2,146	3,674	100	
6 storey or above (5)	2,167	1,448	1,845	2,304	2,475	2,899	10	
856.2 Students' residences, halls of residence, etc (5)	1,787	1,743	-	-	-	1,830	2	
Rehabilitation/Conversion								
816. Flats (apartments)								
Generally (5)	2,014	393	1,149	1,205	2,477	4,843	5	
1-2 storey (5)	1,205	-	-	-	-	-	1	
3-5 storey (5)	2,216	393	-	1,813	-	4,843	4	

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 09-Aug-2025 07:26

Rebased to York (96; sample 20)

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								
856.2 Students' residences, halls of residence, etc (15)	2,191	1,279	1,870	2,219	2,417	3,648	45	

Enclosure 5: Developer-led PBSA Development Typology Appraisals

York CIL Representations
PBSA: 100 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

York CIL Representations
PBSA: 100 unit Typology
Appraisal

Appraisal Summary for Phase 13 100 (V4 - Aug 25)

Currency in £

REVENUE

Rental Area Summary

	Units	ft ²	Rent Rate ft ²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	21,528	53.70	11,560	809,200	1,156,000	809,200

Investment Valuation

Student accommodation - 100 bed typology

Current Rent	809,200	YP @	5.5000%	18.1818	14,712,727
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NET REALISATION

14,712,727

OUTLAY

ACQUISITION COSTS

Residualised Price			126,966	
				126,966
Agent Fee		1.00%	1,270	
Legal Fee		0.80%	1,016	
				2,285

CONSTRUCTION COSTS

Construction

	ft ²	Build Rate ft ²	Cost	
Student accommodation - 100 bed typology	35,880	224.55	8,056,854	
Externals		10.00%	805,685	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		5.00%	443,127	
				9,373,666

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	
Building Safety Levy	35,880 ft ²	1.47	52,744	
				980,294

PROFESSIONAL FEES

Professional Fees		8.00%	709,003	
				709,003

DISPOSAL FEES

Sales Agent Fee		2.00%	294,255	
				294,255

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)				
Land			20,492	
Construction			753,646	
Total Finance Cost				774,137

TOTAL COSTS

12,260,607

PROFIT

2,452,120

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%

IRR% (without Interest)	29.68%
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Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 100 unit Typology Appraisal

Detailed Cash flow Phase 13 (100 (V4 - Aug 25))

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Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	(189,055)	(252,085)	(317,148)	(695,796)	(954,350)	(1,308,953)	(1,749,676)	(2,266,364)	(2,848,870)
Revenue										
Cap - Student accommodation - 100 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	(126,966)	0	0	0	0	0	0	0	0	0
Agent Fee	(1,270)	0	0	0	0	0	0	0	0	0
Legal Fee	(1,016)	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 100 bed typology	0	0	0	(67,858)	(151,637)	(227,174)	(294,469)	(353,522)	(404,333)	(446,902)
Policy H10 AH OSFC Payment	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)	(58,333)
Policy CC1, CC2 & CC3	0	0	0	(225,000)	0	0	0	0	0	0
Policy G12 BNG	0	0	0	(2,550)	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	0	0	0	(6,786)	(15,164)	(22,717)	(29,447)	(35,352)	(40,433)	(44,690)
Site Abnormals	(1,470)	(3,476)	(5,109)	(6,369)	(7,256)	(7,771)	(7,912)	(7,681)	(7,077)	(6,100)
Contingency	0	0	0	(3,732)	(8,340)	(12,495)	(16,196)	(19,444)	(22,238)	(24,580)
Professional Fees										
Professional Fees	0	0	0	(5,972)	(13,344)	(19,991)	(25,913)	(31,110)	(35,581)	(39,327)
Net Cash Flow Before Finance	(189,055)	(61,809)	(63,442)	(376,600)	(254,074)	(348,481)	(432,270)	(505,442)	(567,997)	(619,933)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(1,221)	(1,620)	(2,048)	(4,480)	(6,121)	(8,454)	(11,245)	(14,510)	(18,399)
Net Cash Flow After Finance	(189,055)	(63,030)	(65,062)	(378,648)	(258,555)	(354,602)	(440,724)	(516,688)	(582,506)	(638,332)
Cumulative Net Cash Flow Monthly	(189,055)	(252,085)	(317,148)	(695,796)	(954,350)	(1,308,953)	(1,749,676)	(2,266,364)	(2,848,870)	(3,487,203)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 100 unit Typology Appraisal

Detailed Cash flow Phase 13 (100 (V4 - Aug 25))

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Monthly B/F	011-Jun 2026 (3,487,203)	012-Jul 2026 (4,170,858)	013-Aug 2026 (4,889,486)	014-Sep 2026 (5,573,837)	015-Oct 2026 (6,274,339)	016-Nov 2026 (6,980,823)	017-Dec 2026 (7,683,752)	018-Jan 2027 (8,372,130)	019-Feb 2027 (9,035,591)	020-Mar 2027 (9,664,659)
Revenue										
Cap - Student accommodation - 100 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Agent Fee	0	0	0	0	0	0	0	0	0	0
Legal Fee	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 100 bed typology	(481,230)	(507,315)	(525,159)	(534,761)	(536,121)	(529,239)	(514,115)	(490,749)	(459,142)	(419,292)
Policy H10 AH OSFC Payment	(58,333)	(58,333)	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	(48,123)	(50,732)	(52,516)	(53,476)	(53,612)	(52,924)	(51,412)	(49,075)	(45,914)	(41,929)
Site Abnormals	(4,751)	(3,028)	0	0	0	0	0	0	0	0
Contingency	(26,468)	(27,902)	(28,884)	(29,412)	(29,487)	(29,108)	(28,276)	(26,991)	(25,253)	(23,061)
Professional Fees										
Professional Fees	(42,348)	(44,644)	(46,214)	(47,059)	(47,179)	(46,573)	(45,242)	(43,186)	(40,404)	(36,898)
Net Cash Flow Before Finance	(661,253)	(691,955)	(652,773)	(664,708)	(666,398)	(657,844)	(639,045)	(610,001)	(570,713)	(521,180)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(22,403)	(26,673)	(31,578)	(35,794)	(40,087)	(45,084)	(49,333)	(53,460)	(58,355)	(62,041)
Net Cash Flow After Finance	(683,656)	(718,628)	(684,351)	(700,502)	(706,485)	(702,928)	(688,378)	(663,462)	(629,068)	(583,221)
Cumulative Net Cash Flow Monthly	(4,170,858)	(4,889,486)	(5,573,837)	(6,274,339)	(6,980,823)	(7,683,752)	(8,372,130)	(9,035,591)	(9,664,659)	(10,247,880)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 100 unit Typology Appraisal

Detailed Cash flow Phase 13 (100 (V4 - Aug 25))

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Monthly B/F	021-Apr 2027 (10,247,880)	022-May 2027 (10,774,689)	023-Jun 2027 (11,235,656)	024-Jul 2027 (11,618,884)	025-Aug 2027 (11,966,352)	026-Sep 2027 2,452,120	027-Oct 2027 2,452,120	028-Nov 2027 2,452,120	029-Dec 2027 2,452,120	030-Jan 2028 2,452,120
Revenue										
Cap - Student accommodation - 100 bed typology	0	0	0	0	0	14,712,727	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	(294,255)	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Agent Fee	0	0	0	0	0	0	0	0	0	0
Legal Fee	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 100 bed typology	(371,201)	(314,867)	(250,292)	(177,475)	0	0	0	0	0	0
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	(52,744)	0	0	0	0	0	0
Externals	(37,120)	(31,487)	(25,029)	(17,748)	0	0	0	0	0	0
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(20,416)	(17,318)	(13,766)	(9,761)	0	0	0	0	0	0
Professional Fees										
Professional Fees	(32,666)	(27,708)	(22,026)	(15,618)	0	0	0	0	0	0
Net Cash Flow Before Finance	(461,403)	(391,380)	(311,113)	(273,345)	14,418,473	0	0	0	0	0
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(65,407)	(69,587)	(72,114)	(74,123)	0	0	0	0	0	0
Net Cash Flow After Finance	(526,809)	(460,967)	(383,228)	(347,469)	14,418,473	0	0	0	0	0
Cumulative Net Cash Flow Monthly	(10,774,689)	(11,235,656)	(11,618,884)	(11,966,352)	2,452,120	2,452,120	2,452,120	2,452,120	2,452,120	2,452,120

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Page A 4

York CIL Representations
PBSA: 200 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

York CIL Representations
PBSA: 200 unit Typology
Appraisal

Appraisal Summary for Phase 14 200 (V4 - Aug 25)

Currency in £

REVENUE

Rental Area Summary

	Units	ft ²	Rent Rate ft ²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	43,056	53.70	11,560	1,618,400	2,312,000	1,618,400

Investment Valuation

Student accommodation - 200 bed typology

Current Rent	1,618,400	YP @	5.5000%	18.1818	29,425,455
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NET REALISATION

29,425,455

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(127,008)
	(127,008)

CONSTRUCTION COSTS

Construction

	ft ²	Build Rate ft ²	Cost	
Student accommodation - 200 bed typology	71,760	224.55	16,113,708	16,113,708
Externals		10.00%	1,611,371	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		5.00%	886,254	
				2,681,625

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	
Building Safety Levy	71,760 ft ²	1.47	105,487	
				1,962,387

PROFESSIONAL FEES

Professional Fees	8.00%	1,418,006	
			1,418,006

DISPOSAL FEES

Sales Agent Fee	2.00%	588,509	
			588,509

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)			
Land		(24,742)	
Construction		1,908,727	
Total Finance Cost			1,883,985

TOTAL COSTS

24,521,213

PROFIT

4,904,242

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%
IRR% (without Interest)	25.69%
Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 200 unit Typology Appraisal

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

Page A 1

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	23,954	(83,193)	(194,335)	(885,364)	(1,264,577)	(1,775,400)	(2,407,333)	(3,149,609)	(3,991,481)
Revenue										
Cap - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	127,008	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	0
Policy H10 AH OSFC Payment	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)	(100,000)
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	0	0	0	0	0	0	0	0	0	0
Site Abnormals	(3,054)	(7,147)	(10,605)	(13,428)	(20,747)	(31,016)	(40,417)	(48,949)	(56,613)	(63,407)
Contingency	0	0	0	0	0	0	0	0	0	0
Professional Fees										
Professional Fees	0	0	0	0	0	0	0	0	0	0
Net Cash Flow Before Finance	23,954	(107,147)	(110,605)	(689,774)	(373,503)	(502,701)	(620,467)	(726,802)	(821,706)	(905,178)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	0	(537)	(1,255)	(5,710)	(8,122)	(11,466)	(15,473)	(20,167)	(25,778)
Net Cash Flow After Finance	23,954	(107,147)	(111,142)	(691,029)	(379,213)	(510,823)	(631,933)	(742,275)	(841,873)	(930,956)
Cumulative Net Cash Flow Monthly	23,954	(83,193)	(194,335)	(885,364)	(1,264,577)	(1,775,400)	(2,407,333)	(3,149,609)	(3,991,481)	(4,922,438)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 200 unit Typology Appraisal

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

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Monthly B/F	011-Jun 2026 (4,922,438)	012-Jul 2026 (5,931,281)	013-Aug 2026 (7,007,045)	014-Sep 2026 (8,139,306)	015-Oct 2026 (9,316,334)	016-Nov 2026 (10,424,392)	017-Dec 2026 (11,559,921)	018-Jan 2027 (12,711,237)	019-Feb 2027 (13,867,602)	020-Mar 2027 (15,019,647)
Revenue										
Cap - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 200 bed typology	(693,339)	(743,917)	(785,810)	(819,018)	(843,540)	(859,376)	(866,527)	(864,993)	(854,773)	(835,867)
Policy H10 AH OSFC Payment	(100,000)	(100,000)	(100,000)	(100,000)	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
Externals	(69,334)	(74,392)	(78,581)	(81,902)	(84,354)	(85,938)	(86,653)	(86,499)	(85,477)	(83,587)
Site Abnormals	(15,399)	(13,140)	(10,245)	(6,715)	0	0	0	0	0	0
Contingency	(38,134)	(40,915)	(43,220)	(45,046)	(46,395)	(47,266)	(47,659)	(47,575)	(47,013)	(45,973)
Professional Fees										
Professional Fees	(61,014)	(65,465)	(69,151)	(72,074)	(74,231)	(75,625)	(76,254)	(76,119)	(75,220)	(73,556)
Net Cash Flow Before Finance	(977,219)	(1,037,829)	(1,087,007)	(1,124,754)	(1,048,520)	(1,068,205)	(1,077,093)	(1,075,186)	(1,062,483)	(1,038,983)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(31,624)	(37,935)	(45,254)	(52,274)	(59,538)	(67,324)	(74,223)	(81,179)	(89,562)	(96,423)
Net Cash Flow After Finance	(1,008,843)	(1,075,764)	(1,132,261)	(1,177,028)	(1,108,058)	(1,135,529)	(1,151,316)	(1,156,365)	(1,152,044)	(1,135,407)
Cumulative Net Cash Flow Monthly	(5,931,281)	(7,007,045)	(8,139,306)	(9,316,334)	(10,424,392)	(11,559,921)	(12,711,237)	(13,867,602)	(15,019,647)	(16,155,053)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 200 unit Typology Appraisal

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

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Monthly B/F	021-Apr 2027 (16,165,053)	022-May 2027 (17,262,875)	023-Jun 2027 (18,333,960)	024-Jul 2027 (19,355,356)	025-Aug 2027 (20,315,904)	026-Sep 2027 (21,206,656)	027-Oct 2027 (22,014,037)	028-Nov 2027 (22,726,682)	029-Dec 2027 (23,335,788)	030-Jan 2028 (23,932,703)
Revenue										
Cap - Student accommodation - 200 bed typology	0	0	0	0	0	0	0	0	0	29,425,455
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	(588,509)
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 200 bed typology	(808,277)	(772,000)	(727,038)	(673,391)	(611,058)	(540,040)	(460,336)	(371,946)	(274,872)	0
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	0	0	0	0	0	0	0	0	(105,487)	0
Externals	(80,828)	(77,200)	(72,704)	(67,339)	(61,106)	(54,004)	(46,034)	(37,195)	(27,487)	0
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(44,455)	(42,460)	(39,987)	(37,036)	(33,608)	(29,702)	(25,318)	(20,457)	(15,118)	0
Professional Fees										
Professional Fees	(71,128)	(67,936)	(63,979)	(59,258)	(53,773)	(47,523)	(40,510)	(32,731)	(24,189)	0
Net Cash Flow Before Finance	(1,004,688)	(959,596)	(903,709)	(837,025)	(759,545)	(671,269)	(572,197)	(462,329)	(447,153)	28,836,945
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Seis)	(103,134)	(111,489)	(117,687)	(123,523)	(131,207)	(136,112)	(140,448)	(146,776)	(149,762)	0
Net Cash Flow After Finance	(1,107,821)	(1,071,086)	(1,021,395)	(960,548)	(890,752)	(807,382)	(712,645)	(609,106)	(596,915)	28,836,945
Cumulative Net Cash Flow Monthly	(17,262,875)	(18,333,960)	(19,355,356)	(20,315,904)	(21,206,656)	(22,014,037)	(22,726,682)	(23,335,788)	(23,932,703)	4,904,242

DETAILED CASH FLOW	CBRE
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**York CIL Representations
PBSA: 200 unit Typology
Appraisal**

Detailed Cash flow Phase 14 (200 (V4 - Aug 25))

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York CIL Representations
PBSA: 350 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Appraisal Summary for Phase 15 350 (V4 Aug - 25)

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	75,347	53.70	11,560	2,832,200	4,046,000	2,832,200

Investment Valuation

Student accommodation - 350 bed typology

Current Rent	2,832,200	YP @	5.5000%	18.1818	51,494,545
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NET REALISATION

51,494,545

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(672,861)
	(672,861)

CONSTRUCTION COSTS

Construction

	ft²	Build Rate ft²	Cost
Student accommodation - 350 bed typology	125,578	224.55	28,198,615
Externals		10.00%	2,819,861
Site Abnormals	1 ac	400,000 /ac	304,000
Contingency		5.00%	1,550,924
			4,674,785

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
Building Safety Levy	125,578 ft²	1.47	184,600
			3,433,500

PROFESSIONAL FEES

Professional Fees	8.00%	2,481,478
		2,481,478

DISPOSAL FEES

Sales Agent Fee	2.00%	1,029,891
		1,029,891

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)	
Land	(144,641)
Construction	3,911,366
Total Finance Cost	3,766,725

TOTAL COSTS

42,912,134

PROFIT

8,582,412

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%
IRR% (without Interest)	23.42%
Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

Page A 1

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	515,712	353,286	186,284	(951,115)	(1,483,758)	(2,194,735)	(3,072,211)	(4,104,063)	(5,278,187)
Revenue										
Cap - Student accommodation - 350 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	672,861	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 350 bed typology	0	0	0	(134,150)	(282,069)	(420,093)	(548,224)	(666,460)	(774,802)	(873,250)
Policy H10 AH OSFC Payment	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)
Policy CC1, CC2 & CC3	0	0	0	(787,500)	0	0	0	0	0	0
Policy G12 BNG	0	0	0	(11,400)	0	0	0	0	0	0
Building Safety Levy	0	0	0	(878)	(1,847)	(2,750)	(3,589)	(4,363)	(5,072)	(5,717)
Externals	0	0	0	(13,415)	(28,207)	(42,009)	(54,822)	(66,646)	(77,480)	(87,325)
Site Abnormals	(4,023)	(9,302)	(13,877)	(17,748)	(20,917)	(23,383)	(25,145)	(26,205)	(26,561)	(26,214)
Contingency	0	0	0	(7,378)	(15,514)	(23,105)	(30,152)	(36,655)	(42,614)	(48,029)
Professional Fees										
Professional Fees	0	0	0	(11,805)	(24,822)	(36,968)	(48,244)	(58,649)	(68,183)	(76,846)
Net Cash Flow Before Finance	515,712	(162,427)	(167,002)	(1,137,400)	(526,500)	(701,434)	(863,302)	(1,012,103)	(1,147,837)	(1,270,506)
Debit Rate 7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	0	0	0	(6,143)	(9,543)	(14,174)	(19,750)	(26,286)	(34,088)
Net Cash Flow After Finance	515,712	(162,427)	(167,002)	(1,137,400)	(532,643)	(710,977)	(877,476)	(1,031,853)	(1,174,124)	(1,304,594)
Cumulative Net Cash Flow Monthly	515,712	353,286	186,284	(951,115)	(1,483,758)	(2,194,735)	(3,072,211)	(4,104,063)	(5,278,187)	(6,582,781)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

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Monthly B/F	011-Jun 2026 (6,582,781)	012-Jul 2026 (8,005,182)	013-Aug 2026 (9,533,031)	014-Sep 2026 (11,154,710)	015-Oct 2026 (12,856,867)	016-Nov 2026 (14,626,891)	017-Dec 2026 (16,453,476)	018-Jan 2027 (18,165,227)	019-Feb 2027 (19,911,459)	020-Mar 2027 (21,682,006)
Revenue										
Cap - Student accommodation - 350 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 350 bed typology	(961,804)	(1,040,463)	(1,109,228)	(1,168,099)	(1,217,075)	(1,256,158)	(1,285,346)	(1,304,639)	(1,314,039)	(1,313,544)
Policy H10 AH OSFC Payment	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	(153,125)	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(6,296)	(6,811)	(7,261)	(7,647)	(7,967)	(8,223)	(8,414)	(8,541)	(8,602)	(8,599)
Externals	(96,180)	(104,046)	(110,923)	(116,810)	(121,708)	(125,616)	(128,535)	(130,464)	(131,404)	(131,354)
Site Abnormals	(25,164)	(23,411)	(20,955)	(17,795)	(13,933)	(9,367)	0	0	0	0
Contingency	(52,899)	(57,225)	(61,008)	(64,245)	(66,939)	(69,089)	(70,694)	(71,755)	(72,272)	(72,245)
Professional Fees										
Professional Fees	(84,639)	(91,561)	(97,612)	(102,793)	(107,103)	(110,542)	(113,110)	(114,808)	(115,635)	(115,592)
Net Cash Flow Before Finance	(1,380,107)	(1,476,643)	(1,560,112)	(1,630,514)	(1,687,850)	(1,732,119)	(1,806,099)	(1,830,208)	(1,841,953)	(1,841,335)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(42,294)	(51,207)	(61,567)	(71,643)	(82,174)	(94,465)	(105,652)	(116,025)	(128,595)	(139,199)
Net Cash Flow After Finance	(1,422,401)	(1,527,849)	(1,621,679)	(1,702,157)	(1,770,024)	(1,826,585)	(1,711,751)	(1,746,232)	(1,770,548)	(1,780,534)
Cumulative Net Cash Flow Monthly	(8,005,182)	(9,533,031)	(11,154,710)	(12,856,867)	(14,626,891)	(16,453,476)	(18,165,227)	(19,911,459)	(21,682,006)	(23,462,540)

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

Monthly B/F	021-Apr 2027 (23,462,540)	022-May 2027 (25,240,692)	023-Jun 2027 (27,006,713)	024-Jul 2027 (28,745,379)	025-Aug 2027 (30,444,083)	026-Sep 2027 (32,093,494)	027-Oct 2027 (33,677,491)	028-Nov 2027 (35,183,225)	029-Dec 2027 (36,601,760)	030-Jan 2028 (37,916,100)
Revenue										
Cap - Student accommodation - 350 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 350 bed typology	(1,303,155)	(1,282,872)	(1,252,695)	(1,212,623)	(1,162,657)	(1,102,797)	(1,033,042)	(953,394)	(863,851)	(764,413)
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(8,531)	(8,398)	(8,201)	(7,938)	(7,611)	(7,219)	(6,763)	(6,241)	(5,655)	(5,004)
Externals	(130,316)	(128,287)	(125,269)	(121,262)	(116,266)	(110,280)	(103,304)	(95,339)	(86,385)	(76,441)
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(71,674)	(70,558)	(68,898)	(66,694)	(63,946)	(60,654)	(56,817)	(52,437)	(47,512)	(42,043)
Professional Fees										
Professional Fees	(114,678)	(112,893)	(110,237)	(106,711)	(102,314)	(97,046)	(90,908)	(83,899)	(76,019)	(67,268)
Net Cash Flow Before Finance	(1,628,353)	(1,603,008)	(1,565,300)	(1,515,229)	(1,452,794)	(1,377,996)	(1,290,834)	(1,191,309)	(1,079,421)	(955,170)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(149,799)	(163,013)	(173,366)	(183,475)	(196,618)	(206,001)	(214,900)	(227,225)	(234,919)	(241,890)
Net Cash Flow After Finance	(1,778,152)	(1,766,021)	(1,738,666)	(1,698,703)	(1,649,412)	(1,583,996)	(1,505,734)	(1,418,534)	(1,314,340)	(1,197,060)
Cumulative Net Cash Flow Monthly	(25,240,692)	(27,006,713)	(28,745,379)	(30,444,083)	(32,093,494)	(33,677,491)	(35,183,225)	(36,601,760)	(37,916,100)	(39,113,160)

CBRE

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Detailed Cash flow Phase 15 (350 (V4 Aug - 25))

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York CIL Representations
PBSA: 350 unit Typology
Appraisal

Development Appraisal
CBRE
15 August 2025

**York CIL Representations
PBSA: 350 unit Typology
Appraisal**

Appraisal Summary for Phase 16 600 (V4 - Aug 25)

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	129,167	53.70	11,560	4,855,200	6,936,000	4,855,200

Investment Valuation

Student accommodation - 600 bed typology

Current Rent	4,855,200	YP @	5.5000%	18.1818	88,276,364
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NET REALISATION

88,276,364

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(2,404,462)
	(2,404,462)

CONSTRUCTION COSTS

Construction

	ft²	Build Rate ft²	Cost
Student accommodation - 600 bed typology	215,278	224.55	48,340,750
Externals		10.00%	4,834,075
Site Abnormals	2 ac	400,000 /ac	652,000
Contingency		5.00%	2,658,741
			8,144,816

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
Building Safety Levy	215,278 ft²	1.47	316,459
			5,890,909

PROFESSIONAL FEES

Professional Fees	8.00%	4,253,986
		4,253,986

DISPOSAL FEES

Sales Agent Fee	2.00%	1,765,527
		1,765,527

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)	
Land	(614,119)
Construction	8,186,228
Total Finance Cost	7,572,109

TOTAL COSTS

73,563,635

PROFIT

14,712,728

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.60%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%
IRR% (without Interest)	21.12%
Rent Cover	3 yrs
Profit Erosion (finance rate 7.750)	2 yrs 5 mths

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

Page A 1

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	2,188,512	1,965,125	1,735,072	(92,216)	(773,263)	(1,673,281)	(2,780,655)	(4,083,612)	(5,570,332)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	2,404,462	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	0	0	0	(173,576)	(351,634)	(519,876)	(678,303)	(826,914)	(965,709)	(1,094,688)
Policy H10 AH OSFC Payment	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)
Policy CC1, CC2 & CC3	0	0	0	(1,350,000)	0	0	0	0	0	0
Policy G12 BNG	0	0	0	(24,450)	0	0	0	0	0	0
Building Safety Levy	0	0	0	(1,136)	(2,302)	(3,403)	(4,440)	(5,413)	(6,322)	(7,166)
Externals	0	0	0	(17,358)	(35,163)	(51,988)	(67,830)	(82,691)	(96,571)	(109,469)
Site Abnormals	(5,949)	(13,387)	(20,053)	(25,947)	(31,069)	(35,418)	(38,996)	(41,801)	(43,834)	(45,095)
Contingency	0	0	0	(9,547)	(19,340)	(28,593)	(37,307)	(45,480)	(53,114)	(60,208)
Professional Fees										
Professional Fees	0	0	0	(15,275)	(30,944)	(45,749)	(59,691)	(72,768)	(84,982)	(96,333)
Net Cash Flow Before Finance	2,188,512	(223,387)	(230,053)	(1,827,288)	(680,452)	(895,028)	(1,096,567)	(1,285,068)	(1,460,532)	(1,622,959)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	0	0	0	(596)	(4,990)	(10,807)	(17,889)	(26,188)	(35,975)
Net Cash Flow After Finance	2,188,512	(223,387)	(230,053)	(1,827,288)	(681,047)	(900,018)	(1,107,373)	(1,302,957)	(1,486,720)	(1,658,934)
Cumulative Net Cash Flow Monthly	2,188,512	1,965,125	1,735,072	(92,216)	(773,263)	(1,673,281)	(2,780,655)	(4,083,612)	(5,570,332)	(7,229,267)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

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Monthly B/F	011-Jun 2026 (7,229,267)	012-Jul 2026 (9,048,072)	013-Aug 2026 (11,014,676)	014-Sep 2026 (13,117,827)	015-Oct 2026 (15,344,380)	016-Nov 2026 (17,682,008)	017-Dec 2026 (20,119,939)	018-Jan 2027 (22,644,043)	019-Feb 2027 (25,241,742)	020-Mar 2027 (27,902,880)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	(1,213,852)	(1,323,200)	(1,422,732)	(1,512,448)	(1,592,348)	(1,662,433)	(1,722,702)	(1,773,155)	(1,813,792)	(1,844,614)
Policy H10 AH OSFC Payment	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)	(210,000)
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(7,946)	(8,662)	(9,314)	(9,901)	(10,424)	(10,883)	(11,278)	(11,608)	(11,874)	(12,076)
Externals	(121,385)	(132,320)	(142,273)	(151,245)	(159,235)	(166,243)	(172,270)	(177,316)	(181,379)	(184,461)
Site Abnormals	(45,584)	(45,301)	(44,246)	(42,419)	(39,819)	(36,448)	(32,304)	(27,388)	(21,700)	(15,240)
Contingency	(66,762)	(72,776)	(78,250)	(83,185)	(87,579)	(91,434)	(94,749)	(97,524)	(99,759)	(101,454)
Professional Fees										
Professional Fees	(106,819)	(116,442)	(125,200)	(133,095)	(140,127)	(146,294)	(151,598)	(156,038)	(159,614)	(162,326)
Net Cash Flow Before Finance	(1,772,349)	(1,908,701)	(2,032,015)	(2,142,293)	(2,239,532)	(2,323,735)	(2,394,900)	(2,453,028)	(2,498,118)	(2,530,171)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(46,457)	(57,903)	(71,136)	(84,260)	(98,096)	(114,196)	(129,204)	(144,671)	(163,020)	(179,153)
Net Cash Flow After Finance	(1,818,805)	(1,966,604)	(2,103,152)	(2,226,552)	(2,337,628)	(2,437,931)	(2,524,104)	(2,597,699)	(2,661,138)	(2,709,325)
Cumulative Net Cash Flow Monthly	(9,048,072)	(11,014,676)	(13,117,827)	(15,344,380)	(17,682,008)	(20,119,939)	(22,644,043)	(25,241,742)	(27,902,880)	(30,612,204)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

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Monthly B/F	021-Apr 2027 (30,612,204)	022-May 2027 (33,138,877)	023-Jun 2027 (35,698,059)	024-Jul 2027 (38,274,105)	025-Aug 2027 (40,854,760)	026-Sep 2027 (43,432,130)	027-Oct 2027 (45,989,363)	028-Nov 2027 (48,513,967)	029-Dec 2027 (50,998,771)	030-Jan 2028 (53,425,724)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	0
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	0
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	(1,865,620)	(1,876,810)	(1,878,184)	(1,869,742)	(1,851,485)	(1,823,412)	(1,785,523)	(1,737,818)	(1,680,298)	(1,612,962)
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(12,213)	(12,286)	(12,295)	(12,240)	(12,121)	(11,937)	(11,689)	(11,376)	(11,000)	(10,559)
Externals	(186,562)	(187,681)	(187,818)	(186,974)	(185,149)	(182,341)	(178,552)	(173,782)	(168,030)	(161,296)
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(102,609)	(103,225)	(103,300)	(102,836)	(101,832)	(100,288)	(98,204)	(95,580)	(92,416)	(88,713)
Professional Fees										
Professional Fees	(164,175)	(165,159)	(165,280)	(164,537)	(162,931)	(160,460)	(157,126)	(152,928)	(147,866)	(141,941)
Net Cash Flow Before Finance	(2,331,178)	(2,345,161)	(2,346,878)	(2,336,330)	(2,313,516)	(2,278,438)	(2,231,094)	(2,171,485)	(2,099,610)	(2,015,470)
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(195,494)	(214,022)	(229,168)	(244,325)	(263,854)	(278,795)	(293,510)	(313,319)	(327,344)	(340,904)
Net Cash Flow After Finance	(2,526,672)	(2,559,183)	(2,576,046)	(2,580,655)	(2,577,370)	(2,557,233)	(2,524,604)	(2,484,804)	(2,426,954)	(2,356,374)
Cumulative Net Cash Flow Monthly	(33,138,877)	(35,698,059)	(38,274,105)	(40,854,760)	(43,432,130)	(45,989,363)	(48,513,967)	(50,998,771)	(53,425,724)	(55,782,098)

DETAILED CASH FLOW

CBRE

York CIL Representations PBSA: 350 unit Typology Appraisal

Detailed Cash flow Phase 16 (600 (V4 - Aug 25))

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Monthly B/F	031:Feb 2028 (55,782,098)	032:Mar 2028 (58,061,423)	033:Apr 2028 (60,244,471)	034:May 2028 (62,318,276)	035:Jun 2028 (64,277,007)	036:Jul 2028 (66,100,322)	037:Aug 2028 (67,775,018)	038:Sep 2028 (69,295,796)	039:Oct 2028 (70,641,307)	040:Nov 2028 (71,798,108)
Revenue										
Cap - Student accommodation - 600 bed typology	0	0	0	0	0	0	0	0	0	88,276,364
Disposal Costs										
Sales Agent Fee	0	0	0	0	0	0	0	0	0	(1,765,527)
Unit Information										
Acquisition Costs										
Residualised Price	0	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Student accommodation - 600 bed typology	(1,535,810)	(1,448,842)	(1,352,058)	(1,245,459)	(1,129,044)	(1,002,813)	(866,766)	(720,904)	(565,225)	0
Policy H10 AH OSFC Payment	0	0	0	0	0	0	0	0	0	0
Policy CC1, CC2 & CC3	0	0	0	0	0	0	0	0	0	0
Policy G12 BNG	0	0	0	0	0	0	0	0	0	0
Building Safety Levy	(10,054)	(9,485)	(8,851)	(8,153)	(7,391)	(6,565)	(5,674)	(4,719)	(3,700)	0
Externals	(153,581)	(144,884)	(135,206)	(124,546)	(112,904)	(100,281)	(86,677)	(72,090)	(56,523)	0
Site Abnormals	0	0	0	0	0	0	0	0	0	0
Contingency	(84,470)	(79,686)	(74,363)	(68,500)	(62,097)	(55,155)	(47,672)	(39,650)	(31,087)	0
Professional Fees										
Professional Fees	(135,151)	(127,498)	(118,981)	(109,600)	(99,356)	(88,248)	(76,275)	(63,440)	(49,740)	0
Net Cash Flow Before Finance	(1,919,065)	(1,810,395)	(1,689,459)	(1,556,259)	(1,410,792)	(1,253,061)	(1,083,064)	(900,802)	(706,275)	86,510,836
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	(360,259)	(372,653)	(384,345)	(402,472)	(412,523)	(421,634)	(437,714)	(444,708)	(450,526)	0
Net Cash Flow After Finance	(2,279,325)	(2,183,048)	(2,073,805)	(1,958,731)	(1,823,315)	(1,674,695)	(1,520,778)	(1,345,511)	(1,156,801)	86,510,836
Cumulative Net Cash Flow Monthly	(58,061,423)	(60,244,471)	(62,318,276)	(64,277,007)	(66,100,322)	(67,775,018)	(69,295,796)	(70,641,307)	(71,798,108)	14,712,728

Enclosure 6: CBRE Residential Appraisal – Typology 17

York CIL Representations

Typology 17: Urban - Large - 45 Dwellings - Brownfield

CBRE Appraisal

Development Appraisal
CBRE
15 August 2025

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Appraisal Summary for Phase 3 Typology 17 - CBRE Aug 25

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Private Units	38	36,748	371.55	359,313	13,653,888
Social Rent	4	3,384	148.63	125,738	502,950
Affordable Rent	4	3,384	185.78	157,172	628,688
Intermediate	2	1,709	260.19	222,332	444,665
Totals	48	45,225			15,230,191

NET REALISATION

15,230,191

OUTLAY

ACQUISITION COSTS

Residualised Price		735,131	
			735,131
Purchaser's Costs	1.75%	12,865	
			12,865

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
Build Costs: Private Units	37,995	152.48	5,793,507
Build Costs: Affordable Units	9,280	152.64	1,416,470
Totals	47,275 ft²		7,209,977
Contingency		5.00%	410,274
			7,620,251

Other Construction

16no. Garages (£15k per unit)		249,555	
Externals	10.00%	745,953	
Abnormals		378,000	
Building Safety Levy		30,197	
			1,403,705

Section 106 Costs

S106		397,152	
Policy G12a		48,000	
Policy G12: BNG		11,088	
Policy CC1, CC2 & CC3		720,000	
EV Charging Points		48,000	
Cat(3)(B)		54,480	
Cat(3)(A)		27,907	
			1,306,627

PROFESSIONAL FEES

Professional Fees	8.00%	656,439	
			656,439

DISPOSAL FEES

Private Disposal Fees		3.00%	409,617
Affordable Disposal Fees	10 un	500.00 /un	5,000
			414,617

FINANCE

Debit Rate 7.750%, Credit Rate 0.000% (Nominal)			
Land		133,920	
Construction		119,870	
Other		1,566	
Total Finance Cost			255,356

TOTAL COSTS

12,404,991

PROFIT

2,825,200

Performance Measures

Profit on Cost%	22.77%
Profit on GDV%	18.55%
Profit on NDV%	18.55%

York CIL Representations**Typology 17: Urban - Large - 45 Dwellings - Brownfield****CBRE Appraisal**

IRR% (without Interest)	52.78%
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Profit Erosion (finance rate 7.750)	2 yrs 8 mths
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DETAILED CASH FLOW

CBRE

York CIL Representations Typology 17: Urban - Large - 45 Dwellings - Brownfield CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Page A 1

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)
Revenue										
Sale - Intermediate	0	0	0	0	0	0	0	0	0	18,528
Sale - Affordable Rent	0	0	0	0	0	0	0	0	0	26,195
Sale - Social Rent	0	0	0	0	0	0	0	0	0	20,956
Sale - Private Units	0	0	0	0	0	0	0	0	0	568,912
Disposal Costs										
Private Disposal Fees	0	0	0	0	0	0	0	0	0	(17,067)
Affordable Disposal Fees	0	0	0	0	0	0	0	0	0	(208)
Unit Information										
Private Units										
Social Rent										
Affordable Rent										
Intermediate										
Build Costs: Private Units										
Build Costs: Affordable Units										
Acquisition Costs										
Residualised Price	(735,131)	0	0	0	0	0	0	0	0	0
Purchaser's Costs	(12,865)	0	0	0	0	0	0	0	0	0
Construction Costs										
Con. - Build Costs: Private Units	0	0	0	(39,280)	(85,971)	(128,692)	(167,442)	(202,222)	(233,032)	(259,871)
Con. - Build Costs: Affordable Units	0	0	0	(9,604)	(21,019)	(31,464)	(40,938)	(49,442)	(56,975)	(63,537)
16no. Garages (£15k per unit)	0	0	0	(1,692)	(3,703)	(5,543)	(7,213)	(8,711)	(10,038)	(11,194)
Externals	0	0	0	(5,058)	(11,069)	(16,570)	(21,559)	(26,037)	(30,004)	(33,460)
Abnormals	0	0	0	(2,563)	(5,609)	(8,397)	(10,925)	(13,194)	(15,204)	(16,955)
Building Safety Levy	0	0	0	0	0	0	0	0	0	0
S106	(6,592)	(15,426)	(22,890)	(28,983)	(33,704)	(37,054)	(39,033)	(39,641)	(38,878)	(36,744)
Policy G12a	0	0	0	(325)	(712)	(1,066)	(1,387)	(1,675)	(1,931)	(2,153)
Policy G12: BNG	0	0	0	(75)	(165)	(246)	(320)	(387)	(446)	(497)
Policy CC1, CC2 & CC3	0	0	0	(4,882)	(10,684)	(15,993)	(20,809)	(25,132)	(28,961)	(32,296)
EV Charging Points	0	0	0	(325)	(712)	(1,066)	(1,387)	(1,675)	(1,931)	(2,153)
Cat(3)(B)	0	0	0	(369)	(808)	(1,210)	(1,575)	(1,902)	(2,191)	(2,444)
Cat(3)(A)	0	0	0	(189)	(414)	(620)	(807)	(974)	(1,123)	(1,252)
Contingency	0	0	0	(2,782)	(6,088)	(9,113)	(11,858)	(14,321)	(16,502)	(18,403)
Professional Fees										
Professional Fees	0	0	0	(4,451)	(9,741)	(14,582)	(18,972)	(22,913)	(26,404)	(29,445)
Net Cash Flow Before Finance	(754,587)	(15,426)	(22,890)	(100,577)	(190,401)	(271,617)	(344,226)	(408,226)	(463,619)	106,911
Debit Rate 7.750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%	7,750%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(4,873)	(4,973)	(5,184)	(5,834)	(7,064)	(8,935)	(11,158)	(13,794)	(12,909)
Net Cash Flow After Finance	(754,587)	(20,300)	(27,863)	(105,761)	(196,235)	(278,681)	(353,160)	(419,384)	(477,413)	94,002

York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

Monthly B/F	001:Aug 2025	002:Sep 2025	003:Oct 2025	004:Nov 2025	005:Dec 2025	006:Jan 2026	007:Feb 2026	008:Mar 2026	009:Apr 2026	010:May 2026
	0	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)
Cumulative Net Cash Flow Monthly	(754,587)	(774,887)	(802,750)	(908,511)	(1,104,746)	(1,383,427)	(1,736,588)	(2,155,972)	(2,633,385)	(2,539,383)

**York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal**

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25)

011:Jun 2026 (2,539,383)	012:Jul 2026 (2,482,867)	013:Aug 2026 (2,455,477)	014:Sep 2026 (2,449,035)	015:Oct 2026 (2,454,828)	016:Nov 2026 (2,461,149)	017:Dec 2026 (2,473,162)	018:Jan 2027 (2,483,439)	019:Feb 2027 (2,484,734)	020:Mar 2027 (2,469,978)	021:Apr 2027 (2,431,604)	022:May 2027 (2,362,223)
18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528
26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195
20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956
568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912
(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)
(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)
0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0
(282,741)	(301,639)	(316,568)	(327,526)	(334,514)	(337,531)	(336,578)	(331,655)	(322,761)	(309,898)	(293,063)	(272,259)
(69,128)	(73,749)	(77,398)	(80,078)	(81,786)	(82,524)	(82,291)	(81,087)	(78,913)	(75,768)	(71,652)	(66,565)
(12,179)	(12,993)	(13,636)	(14,108)	(14,409)	(14,539)	(14,498)	(14,286)	(13,903)	(13,349)	(12,624)	(11,728)
(36,405)	(38,838)	(40,760)	(42,171)	(43,071)	(43,459)	(43,337)	(42,703)	(41,558)	(39,901)	(37,734)	(35,055)
(18,448)	(19,861)	(20,655)	(21,370)	(21,825)	(22,022)	(21,960)	(21,639)	(21,059)	(20,219)	(19,121)	(17,764)
0	0	0	0	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	(2,323)
(33,238)	(28,361)	(22,113)	(14,494)	0	0	0	0	0	0	0	0
(2,343)	(2,499)	(2,623)	(2,714)	(2,771)	(2,796)	(2,789)	(2,748)	(2,674)	(2,568)	(2,428)	(2,256)
(541)	(577)	(606)	(627)	(640)	(646)	(644)	(635)	(618)	(593)	(561)	(521)
(35,138)	(37,487)	(39,342)	(40,704)	(41,572)	(41,947)	(41,829)	(41,217)	(40,112)	(38,513)	(36,421)	(33,836)
(2,343)	(2,499)	(2,623)	(2,714)	(2,771)	(2,796)	(2,789)	(2,748)	(2,674)	(2,568)	(2,428)	(2,256)
(2,659)	(2,837)	(2,977)	(3,080)	(3,146)	(3,174)	(3,165)	(3,119)	(3,035)	(2,914)	(2,756)	(2,560)
(1,362)	(1,453)	(1,525)	(1,578)	(1,611)	(1,626)	(1,621)	(1,598)	(1,555)	(1,493)	(1,412)	(1,311)
(20,023)	(21,361)	(22,418)	(23,194)	(23,689)	(23,903)	(23,835)	(23,487)	(22,857)	(21,946)	(20,754)	(19,280)
(32,036)	(34,178)	(35,869)	(37,111)	(37,902)	(38,244)	(38,136)	(37,578)	(36,571)	(35,113)	(33,206)	(30,849)

68,734	39,164	18,203	5,849	5,284	(216)	1,521	10,494	26,704	50,151	80,834	118,754
7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(12,218)	(11,775)	(11,760)	(11,642)	(11,605)	(11,797)	(11,798)	(11,788)	(11,949)	(11,776)	(11,452)	(11,158)
56,516	27,390	6,443	(5,794)	(6,321)	(12,013)	(10,277)	(1,294)	14,755	38,374	69,381	107,596

**York CIL Representations
Typology 17: Urban - Large - 45 Dwellings - Brownfield
CBRE Appraisal**

Detailed Cash flow Phase 3 (Typology 17 - CBRE Aug 25) Page A 3

	023:Jun 2027	024:Jul 2027	025:Aug 2027	026:Sep 2027	027:Oct 2027	028:Nov 2027	029:Dec 2027	030:Jan 2028	031:Feb 2028	032:Mar 2028	033:Apr 2028
	(2,254,627)	(2,101,107)	(1,894,136)	(1,626,338)	(1,289,891)	(877,127)	(261,378)	355,938	973,254	1,590,569	2,207,885
18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528	18,528
26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195	26,195
20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956	20,956
568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912	568,912
(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)	(17,067)
(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)	(208)
0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0
(247,484)	(218,739)	(186,023)	(149,337)	(108,681)	(26,572)	(4,681)	(13,993)	(7,091)	(2,323)	0	0
(60,508)	(53,480)	(45,481)	(36,512)	(26,572)	(4,681)	(13,993)	(7,091)	(2,323)	0	0	0
(10,660)	(9,422)	(8,013)	(6,433)	(4,681)	(13,993)	(7,091)	(2,323)	0	0	0	0
(31,865)	(28,164)	(23,952)	(19,228)	(9,744)	(2,323)	0	0	0	0	0	0
(16,147)	(14,272)	(12,137)	(9,744)	(2,323)	0	0	0	0	0	0	0
(2,323)	(2,323)	(2,323)	(2,323)	(2,323)	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0
(2,050)	(1,812)	(1,541)	(1,237)	(900)	(208)	(13,507)	(1,812)	(2,057)	(1,054)	(17,526)	(28,041)
(474)	(419)	(356)	(286)	(208)	(13,507)	(1,812)	(2,057)	(1,054)	(17,526)	(28,041)	(28,041)
(30,757)	(27,184)	(23,118)	(18,559)	(13,507)	(1,812)	(2,057)	(1,054)	(17,526)	(28,041)	(28,041)	(28,041)
(2,050)	(1,812)	(1,541)	(1,237)	(900)	(208)	(13,507)	(1,812)	(2,057)	(1,054)	(17,526)	(28,041)
(2,327)	(2,057)	(1,749)	(1,404)	(1,022)	(524)	(719)	(10,576)	(16,921)	(342,799)	(216,303)	(163,910)
(1,192)	(1,054)	(896)	(719)	(524)	(719)	(10,576)	(16,921)	(342,799)	(216,303)	(163,910)	(163,910)
(17,526)	(15,490)	(13,173)	(10,576)	(7,696)	(12,314)	(16,921)	(342,799)	(216,303)	(163,910)	(163,910)	(163,910)
(28,041)	(24,784)	(21,078)	(16,921)	(12,314)	(16,921)	(342,799)	(216,303)	(163,910)	(163,910)	(163,910)	(163,910)
163,910	216,303	275,933	342,799	416,902	617,316	617,316	617,316	617,316	617,316	617,316	617,316
7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%	7.750%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(10,391)	(9,332)	(8,135)	(6,352)	(4,139)	(1,566)	617,316	617,316	617,316	617,316	617,316	617,316
153,520	206,971	267,799	336,447	412,764	615,749	617,316	617,316	617,316	617,316	617,316	617,316

