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MM ID 1049

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #129

INCOMPLETE

Started: Monday, March 06, 2023 3:18:27 PM
Last Modified: Monday, March 06, 2023 3:21:57 PM
Time Spent: 00:03:30
IP Address: 188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Tim Ross

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY 459 responses

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Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

PMM31 - Askham Bryan (Policies Map South) link

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

[redacted]

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Respondent skipped this question

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #164

COMPLETE

Started:	Wednesday, March 15, 2023 1:27:36 PM
Last Modified:	Wednesday, March 15, 2023 1:38:34 PM
Time Spent:	00:10:58
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.1 Policy SS1: Delivering Sustainable Growth for York

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Respondent skipped this question

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Respondent skipped this question

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES | DATA TRENDS | INDIVIDUAL RESPONSES

All Pages

Respondent #166

INCOMPLETE

Started:	Wednesday, March 15, 2023 1:38:37 PM
Last Modified:	Wednesday, March 15, 2023 1:40:54 PM
Time Spent:	00:02:16
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

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Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

EX/CYC/92 - Local Housing Needs Assessment By Iceni July 2022

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Respondent skipped this question

Q23

If you object, please select your reason from the list below (select all that apply):

Respondent skipped this question

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Respondent skipped this question

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #200

INCOMPLETE

Started: Monday, March 20, 2023 4:35:23 PM
Last Modified: Monday, March 20, 2023 4:45:18 PM
Time Spent: 00:09:55
IP Address: 188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neill Planning Associates

Q3

Contact details:Please provide email and/or address

Address	Lancaster House, James Nicolson Link, York YO30 4GR
Address 2	James Nicolson Link
City/town	York
Post code	YO304GR
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

No

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

Share Link [redacted] COPY

459 responses

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.4 Policy EC1 explanation – table 4.1

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

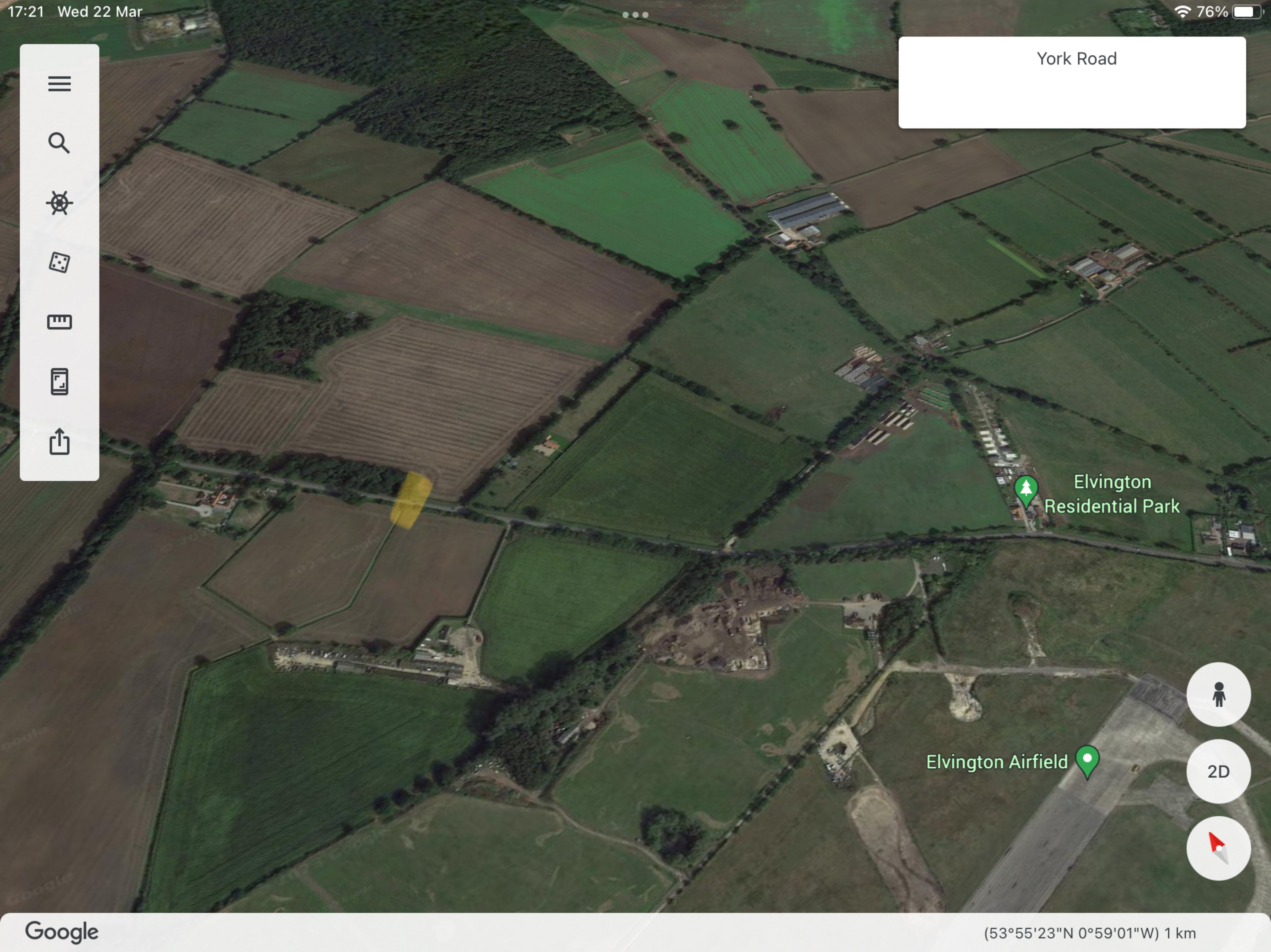
Propose adding the following text, below the existing footnote to the table. Knowledge based businesses would use Class E on a separate site. In this circumstance these uses will operate under the Higher Education use permitted in Policy ED1 Reason: Use Class E encompasses a wide range of activities including offices, research and development industrial processes that can be carried out in a residential area, retail, cafes, gyms and health centres. The university activity will be confined to knowledge-based businesses operating within the Higher Education use.

Local Plan Mods March 2023

Policy EC1 : Proposed modification to the table footnote shaded grey:

Site	Floorspace	Suitable Employment Uses
Heslington Campus East and ST27: University of York Expansion (21.2ha)*	40,000sqm*	Knowledge based business (Use Class E)

** This is an approximate and indicative figure based on the University of York's predicted growth and may be reduced to accommodate other employment generating University uses identified in Policy ED1. Knowledge based business will operate under the prevailing higher education use rather than E1.


17:21 Wed 22 Mar
76%
York Road
Elvington Residential Park
Elvington Airfield
2D
Google
(53°55'23"N 0°59'01"W) 1 km

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #342

INCOMPLETE

Started:	Monday, March 27, 2023 3:02:49 PM
Last Modified:	Monday, March 27, 2023 4:22:04 PM
Time Spent:	01:19:15
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neill Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY 459 responses

[redacted]

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Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link COPY 459 responses

[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

PMM18 - St. Peter's School (Policies Map North) link

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Support

Q23

If you object, please select your reason from the list below (select all that apply):

Respondent skipped this question

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

The school supports PMM18 which, in relation to the school, ensures the green belt boundaries accord with NPPF (2012) paragraphs 85 and 86, and is considered appropriate for the reasons set out in previous representations made on the local plan (EX/CYC/66i) (EX/CYC/21d) and (HS/P3/M2/U&C/7). The education allocation has been expanded in in accordance with the advice of the Inspectors (EX/INS/43). This is supported because it now accurately shows the school campus however there are 2 Inconsistency in the policies map with regards to open space designations arising from the modified education and green belt boundaries.

O'Neill ASSOCIATES

Chartered Town Planning Consultants

City of York Local Plan Modifications Consultation 27 March 2023

Response on behalf of St Peter's School

Consolidated Main Modifications January 2023: Modification Refs. PMM18 and PMM50

1) INTRODUCTION

1.1 These representations are made on behalf of St Peter's School in response to the City of York Local Plan Modifications Consultation March 2023. Specifically, the representations relate to modification refs. PMM18: St. Peter's School (Policies Map North) - Amendment to the Green Belt boundary to follow the flood defences to the south of the site. Modification to the yellow education allocation is shown at PMM50.

1.2 St Peter's School (consultee reference 883) was included in the Examination in Public Phase 3 Hearings Matter 2 in July 2022.

2) DETAILED REPRESENTATIONS

PMM18: amendments to the green belt boundary

2.1 The Council has amendment the green belt boundary in accordance with the advice of the Inspectors (EX/INS/43)

2.2 The school supports PMM18 which, in relation to the school, ensures the green belt boundaries accord with NPPF (2012) paragraphs 85 and 86, and is considered appropriate for the reasons set out in previous representations made on the local plan (EX/CYC/66i) (EX/CYC/21d) and (HS/P3/M2/U&C/7).

PMM50: modification to the education allocation

2.3 The education allocation has been expanded in in accordance with the advice of the Inspectors (EX/INS/43). This is supported because it now accurately shows the school campus.

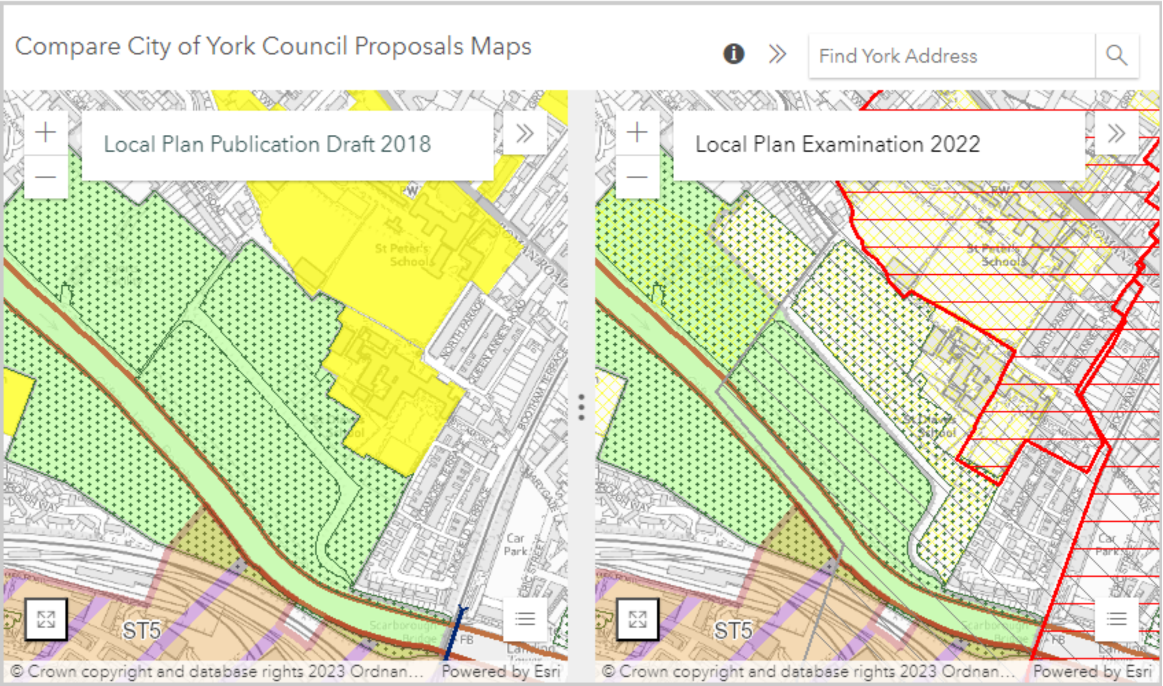
Inconsistency in the policies map with regards to open space designations arising from the modified education and green belt boundaries

2.4 Unfortunately, as a direct result of the modification to the education designation and green belt boundaries, there is now an inconsistency with the open space designations shown on the policies map. The local plan publication draft 2018 did not allow open space/ green belt designations to overlap with education designations, as shown below for St Peter's School.

2.5 The result of PMM18 and PMM50 is that residual open space designation cuts across the existing artificial grass pitch which is nonsensical and includes school playing fields which is inconsistent with other schools. The same is true for York College, (see below). It seems that all school playing fields, except St Peters School and York College are excluded from being designated as open space. Indeed, the 'reason for change' given for PMM47 and PMM48 is explicit about this distinction, as shown below.

PMM 50: St Peters School (Policies Map North)

Reason for change: Extension of the education allocation (yellow) to include the full extent of the school grounds. Modification to the Green Belt boundary is shown at PMM18.

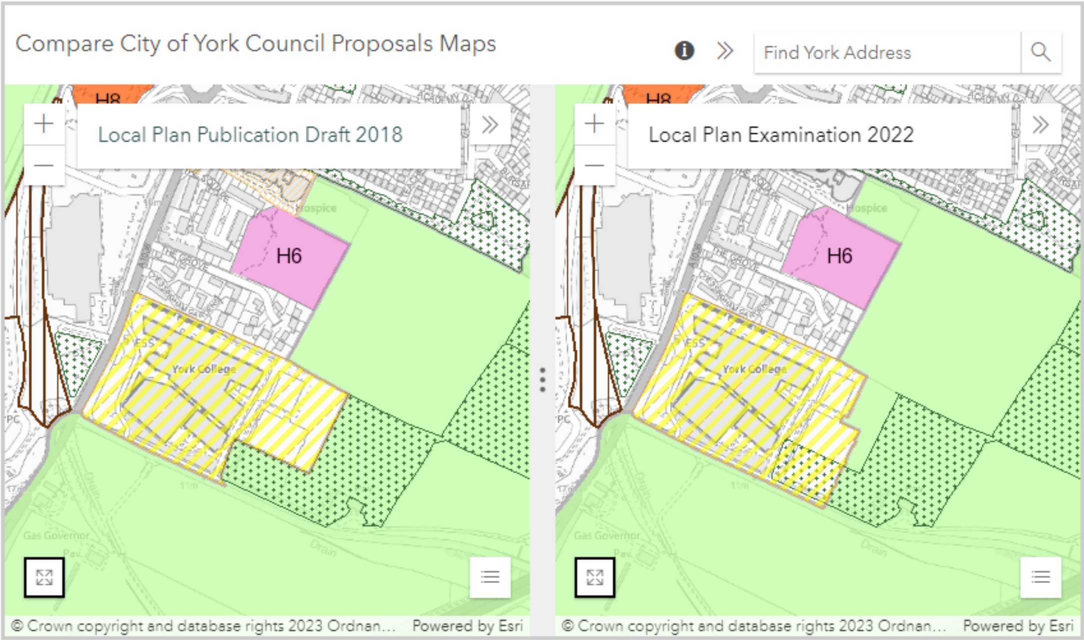


Aerial photograph (below) showing St Peters campus and the existing artificial grass pitch

O'Neill ASSOCIATES

PMM 44: York College (Policies Map South)

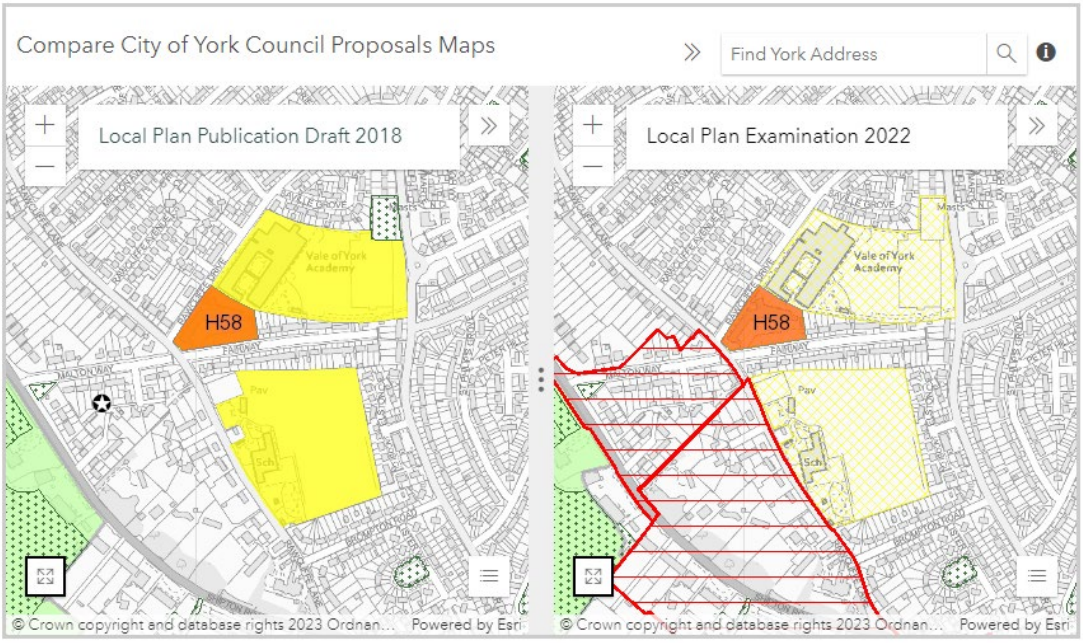
Reason for change: Amendment to the boundary to follow the currently identifiable features of the edge of the existing sports pitch to the east and the northern carriageway of Sim Balk Lane to the south for consistency with the Green Belt methodology.



Aerial photograph (below) showing York College campus and the existing artificial grass pitch

PMM 47: Vale of York Academy and Bootham Junior School (Policies Map North)

Reason for change: Extension of the education allocations across the whole of the school grounds and removal of open space designation for clarity.

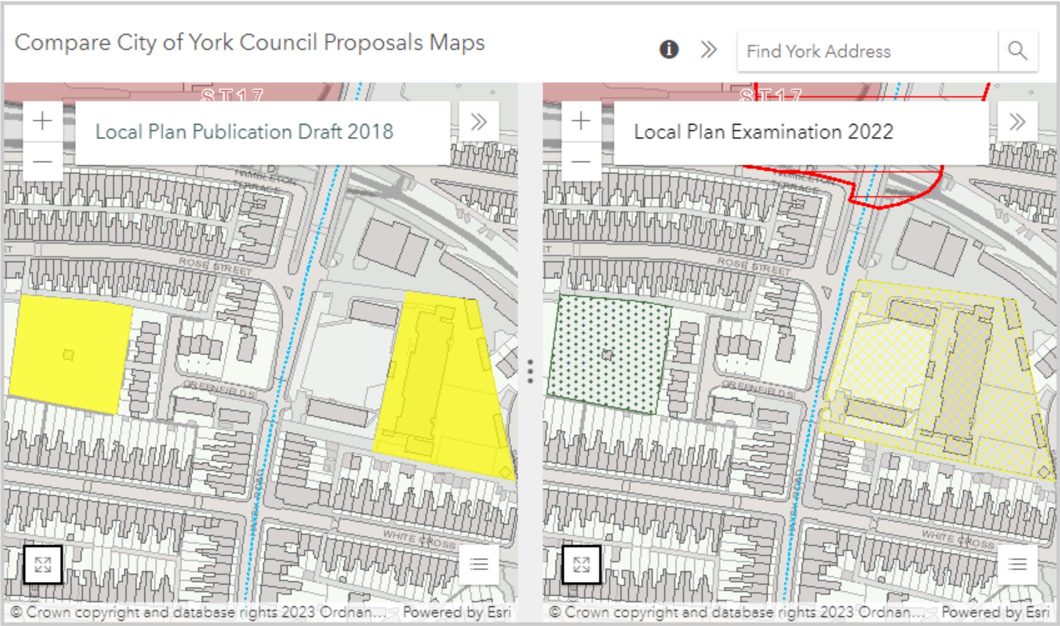


Aerial photograph (below) showing Vale of York Academy and Bootham Junior School playing pitches

O'Neill ASSOCIATES

PMM 48: Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North)

Reason for change: Extension of the education allocations across the whole of the school grounds and to correctly identify land as open space, rather than playing fields.



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #332

COMPLETE

Started:	Monday, March 27, 2023 3:12:03 PM
Last Modified:	Monday, March 27, 2023 3:16:50 PM
Time Spent:	00:04:47
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

PMM31 - Askham Bryan (Policies Map South) link

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

For the reasons set out in the attached document, PMM31 green belt inset and education designation should be extended as per the boundary shown in Appendix A, or alternative boundary shown in Appendix C (in the attached document)

O'Neill ASSOCIATES

Chartered Town Planning Consultants

City of York Local Plan Modifications Consultation 27 March 2023

Response on behalf of Askham Bryan College

Consolidated Main Modifications January 2023: Modification Refs. PMM31

CONTENTS

APPENDICES

- APPENDIX A
  Map 1 – College's proposed green belt inset and education designation on the policies map

- APPENDIX B
  Map 2 – Showing developed land adjacent to PMM31 which makes no contribution to openness that is within the College Campus

- APPENDIX C
  Map 3 – Alternative boundary for both the education designation and green belt inset based on existing roads, paths and boundaries which are physically more readily recognisable than the public right of way to the west.

1.0 Representations on PMM31: Askham Bryan (Policies Map South)

1.1 PMM31 amends both the education designation and green belt boundaries in relation to Askham Bryan College, which are considered separately below:

Green Belt boundaries

1.2 The College welcome the proposal to inset part of the campus within the Green Belt but the proposed boundaries are unjustified and contested for the following reasons:

1.3 The Council has failed to apply the Inspectors advice (EX/INS/43) that very strong boundaries of a facility should be followed rather than drawing boundaries tightly around buildings. Instead, the very strong boundaries which are defined by the A64 to the south and local roads to the north and east should be followed. As well as developed land referred to above, there are access roads, car parking, the Wildlife Park which contains animal enclosures, facilities, other infrastructure and is heavily screened to the south. This land makes little or no contribution to openness but are not included within PMM31 green belt inset. Boundaries to the College campus curtilage are significant in themselves, and more easily defensible, as shown in Appendix A and Appendix C. PMM31 is therefore inconsistent with other education designations shown in the Policies Map.

1.4 The Council's approach to justifying its Green Belt boundaries, in relation to the College, is fundamentally flawed. PMM31 green belt inset excludes land within the College campus that does not serve any of the 3 Green Belt purposes relevant to York, and there is no evidence to support the Council's case that it should be kept permanently open. The Council's justification within Table 1 of EX/SoCG/25 and Appendix 2 of the CYC Matter 2 Statement is confused and irrational. Table 1 of EX/SoCG/25 sets out the College's concerns with the Council's evidence.

1.5 PMM31 green belt inset excludes land within the College Campus containing buildings approved and recently built out for education uses (e.g. 20/02400/FUL, 20/01923/FULM and 13/02946/FULM – details of planning permissions are provided in the EX/SoCG/25. This land is directly adjacent PMM31 as shown outlined in purple in map below (Appendix B). Patently, this

O'Neill ASSOCIATES

developed land makes no contribution to openness, and is unnecessary to keep open.

1.6 PMM31 is drawn too tightly around existing buildings. This approach fails to properly consider the identified development needs and opportunities (e.g. bio-Yorkshire) of the College and city which are set out in the previous representations listed below. The tight boundary would seriously constrain the College's ability to expand and enhance its facilities which would be supported by policy ED7 but would not accord with Green Belt policy. PMM31's restrictive approach conflicts with draft policy ED7 and the wider Local Plan strategy objectives, the draft economic strategy (EX/CYC/104) and draft climate change strategy (EX/CYC/105). PMM31 requires the College to demonstrate 'very special circumstances' to develop on land that is within the education designation but outside the green belt inset. Uncertainty, regarding the ability of the College to expand, will seriously stifle funding opportunities available to the College, as set out in previous representations. The local plan should be evidence based and facilitate 'plan led' decision making.

1.7 The Council's justification within Table 1 of EX/SoCG/25 dismisses the Colleges local plan evidence regarding its growth requirements, including masterplan on the basis that "*there has been no pre-application discussion*" on this, and that the College can submit a planning application for its expansion. This is wholly unacceptable given a key purpose of the local plan is to make provisions for sustainable development needs of the city and the requirement to apply NPPF paragraphs 85 and 86, and contribution to the city's draft economic strategy (EX/CYC/104).

1.8 The revised CYC Matter 2 Statement, Appendix 2 suggests that the use of the cow/ farm sheds as 'agricultural' is a determining factor as to whether this land should be included within the green belt. Furthermore, CYC Matter 2 Statement, Appendix erroneously refers to the agricultural use of buildings which are education uses and received planning permission based on 'very special circumstances' in the green belt. The Council's justification within Table 1 of EX/SoCG/25 acknowledges these errors yet the Council's approach remains unchanged despite consideration of 'agricultural uses' not being part of the criteria contained within NPPF paras 85 and 86. Land containing large buildings within a defined operational college campus does not make an important contribution to openness.

1.9 PMM31 green belt inset reverts to an earlier iteration (which does not does not include the recently completed learning resource extension, planning permission reference 20/02400/FUL) of the inset boundary and is inconsistent with the proposed boundary within EX/SoCG/25.

Education designation

1.10 The college has been in existence since 1948. PMM31 education designation has excluded an important access road from the A64 to the college campus. The Council has not provided a justification for its education designation boundary within PMM31 nor CYC Matter 2 Statement, Appendix 2 (as revised within EX/SoCG/25).

1.11 PMM31's education designation includes land which are private residences as shown as land edged in green in Appendix C. This land should be excluded from the education designation.

Remedy

1.12 PMM31 green belt inset and education designation should be extended as per the boundary shown in Appendix A, or alternative boundary shown in Appendix C.

Previous representations

1.1 These representations relate to Consultations on the Proposed Main Modifications February 2023. They should be read together with the previously submitted objections to the emerging Plan:

- <u>Askham Bryan College York</u> ref 613:

  <u>July 2021</u> (EX/CYC/66g) Reps in respect of whole College campus washed over by Green Belt, including a proposed Green Belt inset boundary (see Map 4 in the reps).
  <u>July 2022</u> (HS/P3/M2/U&C/6 and HS/P3/M3/SH/4) Reps in respect of the Inspectors Matters, Issues and Questions for the Examination

(EX/INS/37 and for Matter 2: Universities and Colleges and Matter 3: Student Housing
October 2022 (EX/SoCG/25) Statement of Common Ground including areas of disagreement between the College and the Council.

<u>APPENDIX A</u>:

Map 1 – College's Proposed Green Belt Inset and education designation based on clearly defined boundaries: A64 to the south, local roads to north and east and public right of way to west. (n/b the buildings shown in blue have been recently built out or have been granted planning permission).

APPENDIX B

Map 2 – Showing developed land (edged in purple) adjacent to PMM31 (edged/ coloured yellow) which makes no contribution to openness and is within the College Campus

APPENDIX C

Map 3 – Alternative boundary (shown as land edged in yellow and blue) for both the education designation and green belt inset. It is based on existing roads, paths and boundaries which are physically more readily recognisable than the public right of way to the west. The PMM31 education designation is edged/ coloured yellow. The proposed extension is edged in blue. The land edged in green are private houses and should be excluded from the education designation.

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #343

COMPLETE

Started:	Monday, March 27, 2023 4:28:12 PM
Last Modified:	Monday, March 27, 2023 4:34:37 PM
Time Spent:	00:06:25
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

SIGN UP FREE

Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.17 Policy H7: Student Housing

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Please see attached documents

City of York Local Plan Modifications Consultation 27 March 2023

Response on behalf of Helmsley Group and Foss Argo Developments Limited

Consolidated Main Modifications January 2023: Modification **Refs. MM5.17 and MM5.18**

Policy H7: Off Campus Purpose Built Student Housing

1) INTRODUCTION

1.1 These representations are made on behalf of Helmsley Group and Foss Argo Developments Limited in response to the City of York Local Plan Modifications Consultation March 2023. Specifically, the representations relate to modification refs. MM5.17, MM5.18 of the Consolidated Main Modifications January 2023, and EX/CYC/107/3 - Student Housing Policy H7 Note August 2022

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

1.3 Modification MM5.17 relates to ***Policy H7: Off Campus Purpose Built Student Housing.*** Modification MM5.18 relates to modification of the Explanation text in §5.47. EX/CYC/107/3 - Student Housing Policy H7 Note August 2022 provides the evidence base to justify the requirement for affordable housing contributions.

1.4 Student housing was included in the Examination in Public Phase 3 Matter 3 in July 2022. Since that discussion a significant number of modifications to policy H7 and explanatory text are proposed, particularly focusing the policy for off campus provision only, and a requirement for affordable housing contributions.

2) DETAILED REPRESENTATIONS

The need for independent PBSA providers

2.1 Private PBSA plays a vital role in meeting student housing needs in York, independent of the Universities. The first paragraph of policy H7 acknowledges this *"in assessing need, consideration will be given to off campus provision and the capacity of independent providers of bespoke student housing in the city"*

2.2 The need for PBSA within York is undisputed by all parties, including the Council. The need derives from the growth of both York St John University and the University of York, as well as meeting the needs of existing student numbers. The Council has accepted that there is current need, due to a persistent deficit of provision in recent years, and a need to provide for future growth in student numbers, in its determination of a number of recent planning permissions through the application e.g. Mecca Bingo, Fishergate YO10 4AR21/01605/FULM dated 25 April 2022 (275 units); Alton Cars, James Street, YO10 3WW 22/00367/FULM dated 9 May 2022 (303 units), amongst others.

2.3 Student housing need is met through a combination of university accommodation, HMOs, the private PBSA sector, students living in their own permanent home, rented or owned, and some stay in the parental home. The choice is mainly down to economic, social and geographical reasons.

2.4 Evidentially, private PBSA already plays an important role in meeting student housing need, and the importance of private PBSA is likely to increase given the growth in student numbers. However, whilst the University of York is continuing to build accommodation for its students, and draft local plan Policy ED1 and ED4 promotes the provision of on-site accommodation for the University of York, accepting that student housing for York St John University will need to be provided off-campus, there is significant demand from students to live off-campus and not within university-controlled accommodation, particularly after their first year.

2.5 In York, the future supply of HMO’s to provide for the growth in student numbers is restricted by:

- draft local plan policy H8 which seeks to control the density of HMOs in any street or neighbourhood for the benefit of existing residents;
- the Article 4 direction covering the whole urban area of York removing permitted development rights that allow dwellings to convert to HMOs; and
- competition from holiday lets which are often more lucrative for landlords and face fewer planning constraints since, in most instances, holiday lets remain as a C3 use class.

2.6 Provided there is sufficient land identified to meet need, private PBSA plus on-campus accommodation may reduce the need for further HMOs, which typically remove family homes from the housing stock which is contrary to local plan objectives. These factors are likely to compound the persistent deficit of provision of PBSA in recent years for existing and future student numbers.

2.7 MM5.17 has the effect of binding private PBSA providers to universities through the requirement for nomination agreements, effectively making them development partners.

Nomination Agreements

2.8 It is understood that nominations agreements are unworkable in York. Our clients have been unable to agree such terms with education providers in the past. Nomination agreements or similar contractual arrangements are commercially sensitive, and require the education provider to assume some of the risk of independent providers, and may not be willing to enter into them therefore. The requirement for nominations agreements as part of MM5.18 therefore presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York.

2.9 In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.

Affordable housing contributions

12.10 MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS). EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound. The CVS is also considered by CBRE as part of the evidence submitted in response to this consultation, and the CVS is itself outdated and misrepresentative of current market conditions. Notwithstanding it is EX/CYC/107/3 that forms part of the local plan evidence base, and is the subject of this consultation not the CVS. Through the publication of the CVS, the Council itself, accepts that EX/CYC/107/3 is unreliable and outdated.

12.11 Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for affordable student accommodation for which there is an identified need, as set out below. The plan is not positively prepared in this regard. Affordable housing need should be met through an appropriate level of housing allocations to provide the certainty of housing deliverability required by the NPPF, and local plan targets.

12.12 Students are being significantly affected by the rise in the cost of living as are households. A survey for the Russell Group Students' Union published in March 2023 pinpointed the problems experienced by students, (Report appended to this representation). In data taken from 8,800 responses the report found: -

- 94% of students are concerned about cost-of-living crisis
- 1 in 5 are considering dropping out
- 1 in 4 are regularly going without food and necessities
- Maintenance loans have been frozen. University leaders say Government forecasts have been inaccurate in each year since 2020-21 and with no mechanism in place to correct for inflation. This means "significant real-terms cut" has been baked into the system.

12.13 Those from lower income families are severely impacted.

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

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

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

12.14 The proposed affordable housing contribution formula in MM5.17 is invalid because it has not been demonstrated that PBSA can support the level of affordable housing contributions required, and any affordable housing contribution will directly take away the ability of developers with or without the Universities involvement from providing affordable student bedrooms.

Viability

12.15 The proposed obligation to contribute to affordable housing currently equates to £7k/bed. This obligation would necessarily be recouped from rental charges. Since rent is a significant proportion of expenditure for students, this would have a major impact on students.

12.16 EX/CYC/107/3 prepared by Porter Planning Economics, is unreliable and fundamentally flawed and has been superseded by the Council's CIL evidence which is also subject to consultation. Even based on the Council's CIL viability study prepared by Porter Planning Economics, the CBRE evidence submitted as part of these representations demonstrates that there is insufficient viability headroom for PBSA to make contributions towards affordable housing. NPPF (2012) 173. States that "*Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable*."

Vacant building credit (VBC)

12.17 To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount. The policy being upheld by the Court of Appeal in West Berkshire v SoSCLG6, in July 2018, VBC was included in NPPF §63 and is retained in NPPF (July 2021) §64.

Flexibility within policy H7

12.18 The Council accept that there is a strategic need to provide purpose-built accommodation within the city. However, the policy must endure for the plan period and needs to be sufficiently flexible. Need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding.

12.19 Furthermore, Student housing will need to be available flexibly 365 days of the year to provide for these other modes of learning delivery and new markets e.g. deliver modules flexibly via short courses and CPD programmes. Delivery of CPD programmes will also require short term accommodation.

12.20 In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students. A number of important groups would be unjustly excluded from accessing PBSA such as students who bring family members with them, whether from overseas, or because they are parent or single parents.

12.21 There also needs to be flexibility to allow for educational conferences, summer schools, etc. This will enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development, policy H7 should allow the temporary use of accommodation during vacation periods for ancillary uses. Examples of such uses, amongst others, include providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses at a higher education provider or any institution approved in advance by the Council. Conditions can be applied to ensure the temporary use should not disrupt the accommodation of the resident students during their academic year, and to ensure that any ancillary use does not result in a material change of use of the building.

3) REMEDY

3.1 **Our clear position, based on detailed viability evidence submitted as part of these representations, is that PBSA cannot support affordable housing contributions. MM5.17 is unsound and all references within policy H7 to affordable housing contributions should be removed. In this regard, revised wording to Policy H7 is suggested below:**

Policy H7: Off Campus Purpose Built Student Housing

The University of York and York St. John University must address the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to off campus provision and the capacity of independent providers of bespoke student housing in the city.

To meet any projected shortfall, provision by the University of York can be made on either campus. Provision by York St. John University is expected to be off campus but in locations convenient to the main campus.

SH1: Land at Heworth Croft, as shown on the proposals Policies Map, is allocated for student housing for York St. John University students.

Proposals for new off campus purpose built student accommodation, other than the allocation at SH1, will be permitted where all of the following criteria are satisfied:

I. *it can be demonstrated that there is a need for purpose-built student ~~housing~~ accommodation which cannot be met on campus. Allowing the temporary use of accommodation during vacation periods for ancillary uses will also be considered; ~~and~~*

II. *it is in an appropriate location for education institutions and accessible by sustainable transport modes;*

~~iia~~ *~~The rooms in the development are secured through a nomination agreement for occupation by students of one or more of the University of York and York St. John University; and~~*

III. *the development would not be detrimental to the amenity of nearby residents and the design and access arrangements would have a minimal impact on the local area; and*

IV. *~~The accommodation shall be occupied only by full-time students enrolled in courses of one academic year or more and c~~ Conditions or obligations shall be imposed to secure occupation of a majority of rooms by students[1] of one or more higher education providers[2] during the academic year, ~~compliance with this requirement and for~~ the proper management of the ~~properties~~ accommodation, and to ensure that any ancillary use does not result in a material change of use of the building.*

~~For new student accommodation a financial contribution, or should be secured towards delivering affordable student accommodation or affordable housing.~~

~~The affordable contribution will be calculated on a pro rata basis per bedroom using the following formula:~~

~~Average York Property price – Average York Fixed RP Price x 2.5% = OSFC per student bedroom~~

---

[1] For the implementation of this policy a student is a person following a course in higher education as recognised by the Office for Students

[2] A higher education provider is defined as an education institution that provides a designated course that has been approved by the Department for Education for higher education study which allows the student to apply for government-financed student loans. Higher education study is at qualification Level 4 or above (i.e. above A-level or equivalent). Further information on qualification levels can be found here: https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels. The Office for Students provides a register listing all the English higher education providers that it officially recognises, which can be found at https://www.officeforstudents.org.uk/advice-andguidance/the-register/the-ofs-register/. This register can be used to determine if a higher education provider delivers designated courses and thus satisfies the above definition

~~The contribution will be required only from the number of units creating a net gain. For mixed-use developments of student accommodation with general housing a pro-rata approach will be used to determine whether a contribution is required, and how much this should be. Contributions towards affordable housing provision from new student accommodation will not be sought where the student accommodation site which at the date of adoption of the Plan is owned by a university and which will continue to be owned by a university to meet the accommodation needs of its students.~~

~~Where a developer considers the contribution cannot be fully met they should justify the level of provision proposed through an open book appraisal to demonstrate to the Council's satisfaction that the development would not otherwise be viable.~~

~~Developers may not circumvent this policy by artificially subdividing sites, and are expected to make efficient use of land.~~

CBRE

City of York Local Plan Proposed Modifications Consultation Feb 2023

Technical representation prepared by CBRE UK Ltd jointly on behalf of the following:

- Foss Argo Developments Ltd
- Helmsley Group Ltd

March 2023

Contents

Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by a consortium of two developers ('the consortium'), each with land and property interests in York, to prepare a formal representation document setting out a technical response to the City of York Council ('CYC') Local Plan Proposed Modification Consultation February 2023 ('the Local Plan consultation').

2. CBRE's instruction relates specifically to CYC's proposed modifications to Policy H7: Off Campus Purpose Built Student Housing.

3. CBRE's technical representations focus upon the evidence base underpinning CYC's proposed modifications to Policy H7, namely:

    a. EX/CYC/107/2 - Affordable Housing Note August 2022: This document is titled the CYC Student Housing Policy H7 Note August 2022 ('the Policy H7 Note'). It is also accompanied by a technical note (as follows)

    b. EX/CYC//107/2 – Appendix 1: This document is titled the CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7, and is dated 22 August 2022 ('the Technical Note').

4. However, it is important for CYC to be aware that the Technical Note that underpins the Policy H7 Note has subsequently been superseded by the publication for consultation of the City of York CIL Viability Study Final Report ('CIL Viability Study'), also produced by Porter Planning Economics ('PPE') and dated December 2022.

5. The CIL Viability Study was published by CYC as part of the evidence base accompanying the Community Infrastructure Levy ('CIL') Draft Charging Schedule consultation, running to 27 March 2023.

6. As the CIL Viability Study supersedes the earlier Technical Note, CBRE is required to have due regard to both documents, and cross-references accordingly within this representation[1].

7. An overarching representation to the Local Plan consultation has been prepared by York-based town planning consultancy O'Neill Associates.

[1] Note: CBRE has also made technical representations to the CYC CIL DCS consultation on behalf of the consortium. CBRE recommends that CYC reviews both sets of representations in parallel.

The Consortium

8. The consortium consists of the following developers, each with existing land and property interests within York:

   – Foss Argo Developments Ltd
   – Helmsley Group Ltd

The Consortium's Stance

9. The consortium has fundamental concerns regarding CYC's proposed modification to Policy H7 to introduce an off-site financial contributions ('OSFC') to traditional affordable housing secured from off campus PBSA development.

10. Specifically, the modification proposes the use of an adjusted version of the OSFC formula set out in Policy H7, which applies the number of student bedrooms. The rate of 2.5% affordable housing equivalent per student bedroom. Whilst the Technical Note applied an OSFC of £5,212 per student bedroom in testing the impact on financial viability, this has subsequently been uplifted to £7,000 per student bedroom as applied within the CIL Viability Study, and represents the latest OSFC sum.

11. It is the consortium's firm view that the introduction of the proposed OSFC to off campus PBSA development 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.

12. In light of above the consortium does not accept the validity and reliability of the published viability evidence base upon which the proposed PBSA OSFC relies.

Matters of Representation

Purpose

13. This section of the document sets out the matters of representation that the consortium determine must be raised with CYC.

Significance of Proposed OSFC

14. The OSFC proposed for off campus PBSA development represents a significant additional cost to development of this typology, at circa £7,000/student bedroom.

15. In addition, CYC has also consulted on a CIL DCS, which proposes to add a further charge of £50/m^2 to off campus PBSA developments delivering 100 student bedrooms or fewer. This means development of this scale will incur both the OSFC and CIL liability.

16. These are not incremental changes, but rather represent a fundamental shift to introduce substantial costs on development.

Illogical Timing

17. The UK property market is experiencing a highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally over 2022 and which is expected to prevail over the course of 2023. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Development and investment across a wide range of sectors are facing headwinds, which commenced in mid-2022 and continue to prevail during 2023.

18. Specifically:

    a. Economic output and outlook has deteriorated as the inflationary squeeze on real incomes weighed on consumer confidence and spending that hit growth momentum. Throughout 2023, CBRE expect unemployment to rise from its current historically low level. In tandem, job vacancies will decrease. Wage growth will not be able to keep up with inflation until late 2023, eroding consumer purchasing power. We expect a moderate recession to occur in 2023, with GDP falling by 0.9%.

    b. Inflation has been rising relentlessly over the past 18 months and is at its highest for 40 years. Inflation has been driven by a post-COVID surge in demand, which could not be met due to supply bottlenecks. Russia's war in Ukraine has exacerbated supply shortages, pushing energy, food, and other commodity prices even higher. Policy choices, such as China's zero-COVID policy, are slowing down the recovery of supply chains, and raising the costs of imported durable goods. In the UK, inflation has been exacerbated by a weak pound, which has made imports more expensive to the UK consumer.

    c. Increased global supply chain disruption has and will continue to put further upward pressure on energy prices, food prices and construction materials. Significant uncertainty persists around the future path of inflation. Inflation remains stubbornly high in early 2023, with the Consumer Prices Index (CPI) rising by 10.4% in the 12 months to February 2023, up from 10.1% in January. CBRE's base case is that CPI inflation will have peaked in Q4 2022 and fall back in the second half of 2023. Implicit in this forecast is the end of the Ukraine conflict by year end with energy - and non-energy commodity prices falling from their current highs.

    d. Monetary tightening is well underway over fears of second-round effects from wage and price-setting. During 2023, the Bank of England will continue to rise interest rates, which CBRE forecast to peak at around 4.5% and push borrowing costs to the highest levels prior to the financial crisis in 2008. As inflation begins to cool, rates will begin to decrease, declining gradually to a 'new normal' of around 2% from 2026 onwards.

    e. Faced with spiraling prices and higher interest rates on loans, businesses and consumers are limiting spending. Consumer confidence has been hit, and retail sales will continue to decline until inflation moderates and consumers restore their purchasing power. Businesses will have to cut costs to preserve margins in a high-inflation environment. This will lead to some job losses and higher unemployment in the first half of 2023.

    f. The 10-year gilt yield has risen by almost 200bps since the beginning of 2022 and financial conditions are materially tighter than in Q2 2022. The expectation of future short-term interest rate hikes will continue to push upward on long-term market interest rates until the base rate starts to move down.

    g. Inflation and rising interest rates have resulted in an increase in property yields. This ongoing yield shift, which commenced from Q3 2022 has hit values and returns for investors. As the cost of capital, closely related to the interest rates of central banks and therefore to inflation, have risen, valuations have been negatively impacted.

19. Specifically considering the PBSA sector, CBRE's baseline forecast for 2023 is as follows:

a. Overall, the sector continues to be undersupplied but this is highly nuanced, and an understanding of affordability is key. An in-depth understanding of the submarket dynamics is critical.

b. Investment yields have softened in H2 2022 and high inflation and rising interest rates will continue to impact the investment and funding market over 2023 and into 2024, until inflation abates and central banks pivot on interest rates.

c. Overall, the development of new PBSA is slowing due to a combination of factors, and this will carry forward throughout 2023. Specifically, the drivers are as follows:

   i. Rising build costs present viability challenges

   ii. The pace of the planning system remains a significant barrier to delivery

   iii. Rising operational costs will also continue to hinder new development given the negative impact on net rental income.

   iv. Development financing is also increasingly expensive and is increasingly difficult to obtain.

20. CBRE questions the logic and rationale, and efficiency in use of public funds, for introducing additional costs on PBSA development via an OSFC in addition to a CIL regime with high charges set on PBSA developments at this juncture, given the wider challenges facing development and uncertainty in both the macro-economy and property market.

21. CYC's proposals to increase the cost burden on development at this point will exacerbate uncertainty and slow or stall development and regeneration plans on major sites across the city for PBSA development.

Outdated Evidence

22. As referenced prior, the published evidence used to inform and underpin the introduction of the OSFC is as follows:

    a. EX/CYC/107/2 - Affordable Housing Note August 2022: This document is titled the CYC Student Housing Policy H7 Note August 2022 ('the Policy H7 Note'). It is also accompanied by a technical note (as follows)

    b. EX/CYC//107/2 – Appendix 1: This document is titled the CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7, and is dated 22 August 2022 ('the Technical Note').

23. However, this evidence is now outdated and has been superseded by the CIL Viability Study produced by PPE and dated December 2022.

24. This presents viability testing of the off campus PBSA typologies that arrives at fundamentally different results to the EX/CYC//107/2 – Appendix 1 Technical Note.

25. Consequently, CYC should no longer be relying upon EX/CYC//107/2, as it represents a flawed evidence base given that property market conditions have shifted significantly since its publication and it has been superseded by other evidence published by CYC.

26. Given this, CBRE focuses analysis on the more recent evidence on the financial viability of PBSA typologies in respect of both the proposed OSFC and CIL charging, as set out within the CIL Viability Study.

27. This said, CBRE also considers that the CIL Viability Study itself is outdated and misrepresentative of current market conditions.

28. CBRE has reviewed the CIL Viability Study in detail. It is apparent that the input assumptions for PBSA scheme typologies, which are subsequently utilised by PPE in undertaking the viability modelling, analysis, conclusions and recommendations rely substantially upon evidence from Q1-2 2022.

29. As set out above, and well-documented, have been significant macro-economic headwinds and property market adjustment issues over the period since, as well as substantive ongoing construction cost inflation, which are material considerations that any robust viability evidence base must account for.

30. In addition, the Government is conducting a staged implementation of the Building Safety Act 2022, and has stated that it expects student accommodation to be subject to the regulatory regime under Part Three, which will have implications for the design and construction of new developments.

31. The Government has also recently consulted upon amendments to Approved Document B, which proposes that all new buildings of 30m (circa 10 storeys) or above will require a second separated staircase[2]. The Greater London Authority ('GLA') has pre-empted the Government's conclusions by mandating this requirement for new development in Greater London with immediate effect.

32. The Government is currently considering responses following closure of the consultation on 17 March 2023, but it is widely anticipated that student accommodation will be required to conform to the amendments, which is prompting developers and investors to factor second staircases into plans for new development going forward in order that they can meet regulations, and be insurable, investable and deliverable. Specifically, Government states:

    "58. Recognising that many schemes are in development, and this change would represent a significant change, we are proposing a very short transition period before implementing the changes.

    59. The transition period will allow time for schemes to be completed but should not allow the opportunity for developments to get off the ground ahead of the new requirements coming into effect.

    60. We would encourage all developments to prepare for this change now."

33. Based on the impact assessment conducted, the Government has publicly acknowledged that the implications of additional construction costs, and loss of build efficiency, will impact negatively on the financial viability of development and, as a result, is likely to reduce the propensity of higher density schemes to deliver affordable housing as a consequence:

    "65. The costs of a second staircase will also impact the viability of high rise buildings, this is likely to reduce the amount of affordable housing that can be provided by developers."

34. The impact will be that gross to net build efficiency is reduced, meaning lower net lettable floorspace against a higher or equivalent gross internal area (GIA).

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[2] https://www.gov.uk/government/consultations/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings

35. It does not appear that the CIL Viability Study has accounted for the this or addressed the implications and it certainly has not been referenced in the earlier EX/CYC//107/2 – Appendix 1 Technical Note.

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

Technical Deficiencies

37. As stated, due to the EX/CYC//107/2 – Appendix 1 Technical Note now being outdated and superseded, CBRE focuses analysis on the more recent evidence on the financial viability of PBSA typologies in respect of both the proposed OSFC and CIL charging, as set out within the CIL Viability Study.

38. This is possible given that the CIL Viability Study accounts for the proposed OSFC within viability modelling, and also tests the viability of the PBSA typologies both with (primarily) and without the proposed OSFC in order to demonstrate the implications.

39. There are a range of detailed technical issues identified, which render the CIL Viability Study as an inadequate basis for CYC utilizing to underpin justification for the OSFC (in addition to CIL charging):

    a. **Rents, Yields and Capital Values for PBSA Typologies:**

        i. CBRE noes not disagree with the CIL Viability Study's usage of the average gross rental income of £177/week to be applied to private sector off campus development typologies for the 2022/23 academic year.

        ii. OPEX is deducted at 30% of gross annual rent to generate a net rental income, which is capitalized at an investment yield of 5.0%. This is stated as generating a capital value of £112,300 per room.

        iii. The CIL Viability Study cites, at para 3.75 that the above capital value is a "*cautious sales value for the sole purpose of this planning viability assessment*".

        iv. CBRE notes that this observation is based on evidence obtained from a Cushman & Wakefield report (non-York specific) drawing on data from H1 2022. It therefore does not represent current market conditions.

        v. Analysing York specifically, there are relatively few recent transactions for which information is available. These are as follows and demonstrate a tone of circa 5.5%-6.5% NIY and capital value of circa £90,000-£100,000 per bed:

            1. 62 Layerthorpe: comprising 98 beds transacted in 2019 on a forward fund / commit to iQ Student Accommodation for a total capital value of £92,000 per bed.

            2. Haxby Road City Residential: comprising 124 beds transacted in 2018 on a stabilized investment basis at a NIY of 6.5%, reflecting £60,000 per bed.

            3. Foss Studios: comprising 220 beds transacted in 2017 on a stabilized investment basis at a NIY of 5.7%, reflecting £106,000 per bed.

        vi. The above capital values would suggest that the sum of £112,300 per room adopted in the CIL Viability Study actually exceeds transactional evidence available for York in recent years.

        vii. 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.

viii. On the basis of the above, CBRE ranks York as a Prime Regional location for PBSA and understand that other agents such as JLL and Knight Frank regard the city on an equivalent basis.

ix. As stated earlier in this document, investment yields have softened since Q3 2022 due to wider macro-economic conditions, and continue to trend weaker in a high interest environment. The latest available investment yield sheets now record Prime Regional PBSA yields as follows:

1. JLL Monthly Yield Sheet: PBSA Prime Regional at 5.25% in January 2023 (softening from 5.0% in Q3-4 2022[3].
2. Knight Frank Prime Yield Guide – March 2023: PBSA Prime Regional at 5.0% - 5.25% (softening from 4.75%-5% in Q3 2022)[4].
3. CBRE UK Living Sectors Investment Yields – March 2023: PBSA Prime Regional at 5.0% and trending weaker (softening from 4.75% in Q3 2022)[5].

x. In summary, three respected agents all report PBSA Prime Regional yields softening to 5.0% - 5.25% at present day. Importantly, these are not development funding yields, but are stabilized investment yields.

xi. Institutional forward funding has been one of the main delivery routes for financing the development of PBSA schemes in York and elsewhere across the regions, where brought forward by the private sector (i.e. non-University). CBRE's market intelligence is that funding yields are transacting at a discount of circa 25bps in comparison to stabilized investment yields. As a result, if the rates above are adjusted for development funding, this would see yields at 5.25% - 5.5%.

b. **Construction costs**:

i. The construction costs adopted are set out in Table 5.3 on p.49 are cited as being drawn from RICS BCIS. The source data is referenced as being provided in Appendix D. The RICS BCIS cost is cited as £2,112/m^2 (£196/ft^2) and base-dated at Q3 (i.e. Jul.-Sept.) 2022.

ii. Given that circa 6 months has passed since the construction costs were base dated, CBRE has reviewed the RICS BCIS data as published at 11 March 2023. On an equivalent basis the RICS BCIS median cost now stands at £2,166/m^2 (£201/ft^2), which is an increase of 2.6%. The data is provided within **Enclosure 2**.

[3] Note: this is provided within **Enclosure 1**.
[4] Note: this is provided within **Enclosure 1**.
[5] Note: this is provided within **Enclosure 1**.

iii. CBRE comment that the RICS BCIS costs of £2,166/m^2 (£201/ft^2) are extremely low in the context of PBSA developments being brought forward for delivery in regional cities in the current market, and would highlight that RICS BCIS is a significantly lagging indicator due to the time taken for tender data be provided and reporting updated. Hence, in an inflationary environment over 2022 and 2023, it has consistently underestimated construction costs being generated in real-time. Moreover, as mentioned prior, RICS BCIS will not yet account for changes to fire safety guidance (Approved Document Part B).

iv. CBRE notes that the CIL Viability Study also cites in para. 5.10 that additional allowance of 15% of build costs for external site works such as utilities, car parking and landscaping is provided.

v. However, reviewing the example 100-bed typology appraisal in Appendix A confirms that there is an error, whereby the viability appraisals only account for a 10% external works cost, which means that there is an omission in the viability testing of this typology of at least £280,262.50. This is greater than the entirety of the CIL headroom of £223,666, which would significantly alter the conclusions and recommendations of the CIL Viability Study. In essence, if corrected, it would eradicate any headroom at all for CIL on Typology 10a or 10b alongside the proposed OSFC, and CIL would require reducing to NIL for these typologies. As a result, the charging rate of £50/m^2 proposed within the CIL DCS for "*Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution*" would be required to be removed altogether via modification.

vi. In a further apparent error, the 100-bed typology appraisal in Appendix A contains only 8% professional fees, as a cost allowance. However, para. 5.10 states clearly that modelling allows for " *10% of build costs and externals for professional fees associated with the build, including architect fees, planner fees, surveyor fees, and project manager fees*". This means a further cost omission within the viability testing of the PBSA typologies, which will further reduce the viability of this use if reintroduced to the viability appraisals for each PBSA typology.

vii. CBRE has set aside the above points, pending clarification from CYC.

viii. Taking a stand back approach, CBRE's cross-section of market intelligence in the sector is that the current minimum construction cost for developer-led mid-specification PBSA schemes in the regions, equates to circa £85,000 per bed. It is CBRE's direct experience that higher specification schemes, which seek to secure higher rents from students (and which primarily target the international student market) are incurring far higher costs.

ix. In **Table 2** overleaf, CBRE has set out both a comparison between the RICS BCIS median rate costs as at Q3 2022 and March 2023. CBRE considers these costs to be more likely representative of construction to a low-mid specification product, which would achieve a lower than average rental price point in the York market. As the definition in RICS BCIS states it would therefore be more appropriate to reflect student halls of residences (i.e. university-led on campus development), rather than the higher specification product being delivered off-campus by private developers, and those which can secure rents at an average for York (i.e. the £177/week) or above.

x. CBRE notes that the RICS BCIS upper quartile rate (£2,389/m^2 | £222/ft^2) generates a construction cost, when allowing for external works, that is commensurate with the level of costs being seen for mid-market specification PBSA schemes in the regions (at circa £84,500/bed). This is provided for comparison in **Table 2**.

xi. For the reasons set out above, CBRE strongly advocates that the RICS BCIS upper quartile rate should represent the base construction cost for viability testing developer-led (i.e. off campus) PBSA typologies. The median rate simply isn't a realistic cost benchmark to adopt for this purpose in the current market.

Table 2: Comparison Analysis: RICS BCIS Costs Q3 2022 vs. Q1 2023 vs. Minimum Market Rates (CBRE Q1 2023)

RICS BCIS Median Q3 2022			Build			External Works @ 10%		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,112	196	19,288	40,736,256	600	67,894	4,073,626	6,789	44,809,882	74,683	2,323	216
2,112	196	11,251	23,762,112	350	67,892	2,376,211	6,789	26,138,323	74,681	2,323	216
2,112	196	6,429	13,578,048	200	67,890	1,357,805	6,789	14,935,853	74,679	2,323	216
2,112	196	3,215	6,790,080	100	67,901	679,008	6,790	7,469,088	74,691	2,323	216
RICS BCIS Median Q1 2023			**Build**			**External Works @ 10%**		**Total Costs (Build + Externals)**			
£/m2	**£/ft2**	**GIA (m2)**	**Cost (£)**	**Beds (Typologies)**	**£/Bed**	**Cost (£)**	**£/Bed**	**Cost (£)**	**£/Bed**	**£/m2**	**£/ft2**
2,166	201.2	19,288	41,777,808	600	69,630	4,177,781	6,963	45,955,589	76,593	2,383	221
2,166	201.2	11,251	24,369,666	350	69,628	2,436,967	6,963	26,806,633	76,590	2,383	221
2,166	201.2	6,429	13,925,214	200	69,626	1,392,521	6,963	15,317,735	76,589	2,383	221
2,166	201.2	3,215	6,963,690	100	69,637	696,369	6,964	7,660,059	76,601	2,383	221
RICS BCIS Upper Quartile Q1 2023			**Build**			**External Works @ 10%**		**Total Costs (Build + Externals)**			
£/m2	**£/ft2**	**GIA (m2)**	**Cost (£)**	**Beds (Typologies)**	**£/Bed**	**Cost (£)**	**£/Bed**	**Cost (£)**	**£/Bed**	**£/m2**	**£/ft2**
2,389	221.9	19,288	46,079,032	600	76,798	4,607,903	7,680	50,686,935	84,478	2,628	244
2,389	221.9	11,251	26,878,639	350	76,796	2,687,864	7,680	29,566,503	84,476	2,628	244
2,389	221.9	6,429	15,358,881	200	76,794	1,535,888	7,679	16,894,769	84,474	2,628	244
2,389	221.9	3,215	7,680,635	100	76,806	768,064	7,681	8,448,699	84,487	2,628	244

Source: RICS BCIS / CBRE Data

c. **Site Areas for Typologies**: It is not clearly stated within the CIL Viability Study as to how the site areas applied for each typology were derived and the evidence used to inform this. Given this is an important basis for setting benchmark land values, CBRE requests that this information is provided by CYC to provided transparency and clarity to stakeholders.

d. **Benchmark Land Value**:

i. The CIL Viability Study includes the adopted BLVs for non-residential uses within Table 5.6 on p.52. However, the document contains no supporting justification or evidence to underwrite the proposed BLVs, which CBRE considers a significant omission.

ii. The CIL Viability Study proposes a BLV of £1.5m/ha (£607,000/acre) as the BLV to apply to PBSA typologies.

iii. In order to find justification for this BLV, CBRE has had regard to the earlier EX/CYC//107/2 – Appendix 1 Technical Note. An explanation is provided in paras 20-23.

iv. 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 EX/CYC//107/2 – Appendix 1 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.

v. CBRE is not aware of any abandoned, unviable or dilapidated industrial premises that could be redeveloped for PBSA use. There is presently a limited supply of sites suitable for redevelopment for PBSA uses across the city, which necessitates PBSA development competing with other forms of prospective development including hotels, traditional residential, elderly persons accommodation or offices.

vi. CBRE is therefore unclear on the logic behind Table 5.6 in the CIL Viability Study, on p.52. This is replicated below. It sets a substantially lower BLV for PBSA development in comparison to competing uses such as Hotel and Care Home uses (both £2m/ha), supermarket use (£2m/ha) and retail warehouse use (£2m/ha).

Table 5.6 Benchmark land values for non-residential existing uses

Typology	BLV per gross area
1: Town centre office	£1,500,000
2: Business park	£1,000,000
3: Industrial / warehouse	£850,000
4: Small local convenience	£2,000,000
5: Supermarket	£2,000,000
7: Retail warehouse	£2,000,000
8: City Centre retail	£4,000,000
9: Hotel (60 beds)	£2,000,000
10: Student accommodation	£1,500,000
11. Care home (60 bed)	£2,000,000

vii. In addition, CBRE also notes that the CIL Viability Study adopts a BLV for residential typology viability testing of £1.7m/ha for brownfield land in its existing use as 'City centre / extension' land within Table 4.15 on p.47.

viii. The CIL Viability Study does not adequately justify why competing brownfield land uses have been viability tested against a higher BLV and PBSA against a lower BLV. This warrants further explanation by CYC.

ix. 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.

x. A rational approach would be for BLVs for this use to be considered by way of market transactional analysis of sites brought forward for PBSA use within the city of York in recent years. CBRE recommends that CYC seek to source and consider such evidence in taking a 'stand back' approach and a York-specific market sense-check.

Results & Re-appraisal

40. The CIL Viability Study sets out the results of viability modelling within Table 7.1 on p.61. This is replicated below for ease.

Table 7.1 Recommended non-residential psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of		
		50%	33%	25%
1: Town centre office	-£1,034			
2: Business park	-£906			
3: Industrial / warehouse	-£333			
4: Small local convenience	£154	£77	£103	£115
5: Supermarket	-£117			
7: Retail warehouse	£134	£67	£90	£101
8: City Centre retail	-£68			
9: Hotel (60 beds)	-£143			
10a: Student accommodation - 25 bed	£127	£64	£85	£95
10b: Student accommodation - 100 bed	£84	£42	£56	£63
10c: Student accommodation – 200 bed	-£16			
10d: Student accommodation - 350 bed	-£50			
10e: Student accommodation - 600 bed	-£152			
11. Care home (60 bed)	-£937			

41. Whilst the CIL Viability Study only appends a summary viability appraisal for PBSA typology 10b, Table 7.1 clearly demonstrates PPE's headroom analysis concludes that only PBSA typologies 10a and 10b can viably accommodate both any CIL and a 2.5% affordable housing equivalent OSFC contribution per student bedroom.

42. This is notwithstanding CBRE and the consortium's representations that the conclusions within Table 7.1 and the CIL Viability Study are they themselves outdated and don't reflect deterioration in market conditions since Q3/4 2022.

43. With this in mind, Table 7.1 of the CIL Viability Study shows PBSA typologies 10c – 10e to all fall below the threshold of financial viability. This means they cannot accommodate any CIL, as there is no headroom, but critically these PBSA typologies are also demonstrated as generating negative headroom (shown in red) before charging of any CIL.

44. The off campus PBSA typologies already incorporate the OSFC cost of £7,000 per student bedroom. This means that the CIL Viability Study now determines that these off campus PBSA typologies are now unable to partially or fully meet the proposed OSFC costs of Policy H7 whilst remaining financially viable – as they generate negative headroom **before** incurring CIL.

45. It is no longer possible to discern from CYC's published evidence base where the threshold for viability actually sits in relation to the propensity of these PBSA typologies to be able to accommodate any OSFC costs.

46. This evidence in the CIL Viability Study directly contradicts the Table 6 results in the earlier published EX/CYC//107/2 – Appendix 1 Technical Note. This is replicated below for ease.

Table 6 PBSA scheme viability test at CYC Local Plan full policy and different OSFC rates

Scheme type	Land type	Viability and headroom			
		0% OSFC per student room (0% per Cluster unit)	2.5% OSFC per student room (10% per Cluster unit)	5% OSFC per student room (20% per Cluster unit)	10% OSFC per student room (40% per Cluster unit)
25-bed PBSA	Brownfield	£16,025	£10,276	£4,455	-£7,662
100-bed PBSA	Brownfield	£11,884	£6,151	£417	-£11,732
200-bed PBSA - low density	Brownfield	£11,095	£5,379	-£336	-£12,385
350-bed PBSA	Brownfield	£11,088	£5,386	-£316	-£12,326
600-bed PBSA	Brownfield	£8,794	£3,111	-£2,572	-£14,627

47. In summary, the CIL Viability Study now supersedes the earlier EX/CYC//107/2 – Appendix 1 Technical Note and clearly demonstrates it is out-of-date and can no longer be relied upon by CYC.

48. In the intervening period between the EX/CYC//107/2 – Appendix 1 Technical Note being produced and the CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

49. Consequently, based on the CIL Viability Study results, there is no longer any evidenced justification for CYC seeking for off-campus PBSA schemes to provide a 2.5% affordable housing equivalent OSFC contribution per student room (particularly in 200+ bed PBSA typologies), as there is no longer sufficient 'headroom' demonstrable within the tested PBSA typologies to support this financial contribution.

50. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

51. Further elaboration is provided in PPG Viability (para. 002 ref: 10-002-20190509):

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

52. As clearly set out in both PPG and the RICS Guidance[6], the impact on viability of a CIL, whether proposed or existing, should be considered alongside the full policy requirements of the Plan – this should therefore include the demonstrable viability of PBSA typologies (off-campus) to provide a 2.5% affordable housing equivalent OSFC contribution per student room.

53. In simple terms, a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for, and taking precedence over, the introduction of CIL rate setting. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage. PPG Viability is explicit on this point, stating the following in para. 002 ref: 10-002-20190509:

"Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."

54. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed required of Policy H7 is unsound and requires removal.**

55. Noting this issue, the CIL Viability Study also runs viability testing on PBSA typologies, specifically with the cost of meeting the 2.5% affordable housing equivalent OSFC contribution per student room **removed**, to determine CIL headroom to apply to on-campus PBSA. This is replicated in the following table.

Table 7.2 Recommended on campus student accommodation, psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of		
		50%	33%	25%
10a: Student accommodation - 25 bed	£421	£211	£281	£316
10b: Student accommodation - 100 bed	£374	£187	£249	£281
10c: Student accommodation - 200 bed	£272	£136	£181	£204
10d: Student accommodation - 350 bed	£238	£119	£159	£179
10e: Student accommodation - 600 bed	£135	£68	£90	£101

56. CBRE cannot support the levels of CIL headroom being identified within Table 7.2 above for the PBSA typologies, for the reasons set out earlier within this representation.

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

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

57. Given CBRE's analysis set out above firmly highlights both technical issues with the CIL Viability Study evidence base and that market conditions have deteriorated since its publication, CBRE has run independent viability modelling on PBSA typologies to determine the implications for CIL headroom in the current market.

58. CBRE has utilised present-day input assumptions for off-campus (developer-led) PBSA development scheme typologies.

59. Firstly, CBRE has set the rental rates at £177/week to represent an average rate across the York market. OPEX is deducted at 30% of the gross annual rent to generate a net rental income. This is consistent with the CIL Viability Study inputs.

60. Secondly, CBRE has capitalised the net rental income at an investment yield of 5.0%. As set out earlier in this representation, most private-sector driven PBSA development has, and is expected to continue to be, institutionally funded. PBSA development funding yields are presently at circa 5.25% - 5.5% for prime regional locations, such as York. CBRE has taken the more optimistic stance of provisionally retaining the rate adopted in the CIL Viability Study, which represents a best case illustrative position as it would be unlikely to be achievable in today's market.

61. Thirdly, CBRE has increased the construction costs to reflect the RICS BCIS upper quartile cost as published at March 2023. This is deemed the most representative benchmark rate for current market construction costs for mid-market specification private-sector led PBSA schemes being brought forward in regional cities.

62. Fourthly, CBRE has not adjusted the external works and professional fees allowances utilised in the CIL Viability Study modelling – utilising the lower rates in the example appraisal appended to the document, rather than the higher figures referenced in the text. This therefore, again, adopts the most optimistic position absent of clarification from CYC.

63. Finally, CBRE has removed the proposed £7,000 OSFC per student bedroom from the viability modelling. The purpose therefore is to determine whether there is viability headroom to accommodate the OSFC contribution, and the level of surplus (headroom) per student room available (or deficit).

64. No CIL is allowed in addition, and is excluded.

65. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. As previously, this should not be taken as an endorsement, but is deemed reasonable and rational for the purposes of comparison – given it is not the responsibility of the consortium to prepare CYC's evidence.

66. The headroom analysis is provided overleaf. Appraisal summaries are provided within **Enclosure 3**.

Table 3: Headroom Analysis: Developer-led Off Campus PBSA Development – OSFC Headroom / Student Bedroom

		Headroom
Typology	PBSA Beds	£ OSFC / Student Room
10b	100-bed	1,084
10c	200-bed	-1,401
10d	350-bed	-2,174
10e	600-bed	-4,703

Source: CBRE

67. In summary, the analysis in Table 3 above reiterates that there is insufficient headroom for off-campus developer-led PBSA schemes to provide the affordable OSFC sought via Policy H7 (as modified). If combined with CIL liability as proposed for typologies 10a and 10b, then this would completely eradicate any headroom whatsoever (leading to the OSFC being immediately negotiated away at decision making stage on relevant developments).

68. It is also important to note that the Table 3 appraisals include a 5.0% funding yield. If adjusted out to 5.25%, a sensitivity test in Table 4 below shows that this eradicates any prospective surplus to be directed either into the affordable OSFC sought via Policy H7 or CIL. Introducing either cost on this typology would therefore risk pushing this PBSA typology beyond the margin of viability.

Table 4: Headroom Analysis: Developer-led Off Campus PBSA Development – OSFC Headroom / Student Bedroom (Yield)

		Headroom
Typology	PBSA Beds	£ OSFC / Student Room
10b	100-bed	-2,477

Source: CBRE

69. On the weight of the above (and enclosed) evidence, CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL. The appraisal summary is provided within **Enclosure 4**.

Lack of Transparency

70. There is a lack of transparency in the CIL Viability Study that CBRE deems falls short of the requirements and expectations of PPG CIL (Paragraph: 019 Reference ID: 25-019-20190901), PPG Viability (Paragraph: 010

Reference ID: 10-010-20180724), the NPPF (para. 58), the RICS Guidance[7] and RICS Professional Standards[8], and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.

71. Specifically, only one example appraisal is provided for the PBSA typology (100-bed). This is inadequate and all appraisals for non-residential typologies (notably PBSA) should be issued.

[7] RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note
[8] RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition

Conclusions and Recommendations

73. The consortium cannot endorse or support CYC's proposed modifications to Policy H7: Off Campus Purpose Built Student Housing proposing introduction of an OSFC (at a rate of 2.5% affordable housing equivalent per student bedroom) towards traditional affordable housing secured from off campus PBSA development.

74. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

75. CYC's published evidence base underpinning the proposed modification introducing the OSFC is now out-of-date and can no longer be relied upon by CYC.

76. In the intervening period between the EX/CYC//107/2 – Appendix 1 Technical Note being produced and the CYC CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

77. The CIL Viability Study now supersedes the earlier EX/CYC//107/2 – Appendix 1 Technical Note and clearly demonstrates it there is no longer sufficient viability 'headroom' within the tested PBSA typologies to support this financial contribution.

78. CBRE has prepared additional up-to-date viability evidence within this representation. CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL.

79. PPG and RICS Guidance[9] requires that a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage.

80. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed requirement of Policy H7 is unsound and requires removal.**

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

Enclosures

Enclosure 1: Investment Yield Guides – Q1 2023

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

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LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond

BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

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We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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JLL SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

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Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

Enclosure 2: RICS BCIS – Rebased to York (March 2023)

BCIS®

£/m2 study

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

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

Enclosure 3: Developer-led (Off-campus) PBSA Development Typology Appraisals (Excluding Modified Policy H7 OSFC)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION	**22,459,990**

OUTLAY

ACQUISITION COSTS					
Residualised Price			409,788		
				409,788	
Stamp Duty			9,989		
Effective Stamp Duty Rate		2.44%			
Agent Fee		1.00%	4,098		
Legal Fee		0.80%	3,278		
				17,366	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Student accommodation - 200 bed typology	57,135	221.90	12,678,221		
Externals		10.00%	1,267,822		
Site Abnormals	0 ac	400,000 /ac	184,000		
Contingency		4.00%	557,842		
				14,687,885	
Other Construction					
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000		
Policy G12 BNG	0 ac	15,000 /ac	6,900		
				456,900	
PROFESSIONAL FEES					
Professional Fees		8.00%	1,115,683		
				1,115,683	
DISPOSAL FEES					
Sales Agent Fee		2.00%	449,200		
				449,200	
FINANCE					
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)					
Land			92,674		
Construction			1,487,163		
Total Finance Cost				1,579,837	
TOTAL COSTS				**18,716,658**	
PROFIT					
				3,743,332	

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000

NET REALISATION				**39,305,000**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			379,270	
				379,270
Stamp Duty			8,463	
Effective Stamp Duty Rate		2.23%		
Agent Fee		1.00%	3,793	
Legal Fee		0.80%	3,034	
				15,290
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				25,683,014
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			99,231	
Construction			3,040,130	
Total Finance Cost				3,139,361
TOTAL COSTS				**32,754,167**
PROFIT				
				6,550,833

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY	CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation					
Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998
NET REALISATION				**67,379,998**	
OUTLAY					
ACQUISITION COSTS					
Residualised Price (Negative land)			(376,826)		
				(376,826)	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**	
Externals		10.00%	3,803,233		
Site Abnormals	2 ac	400,000 /ac	652,000		
Contingency		4.00%	1,673,422		
				6,128,655	
Other Construction					
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000		
Policy G12 BNG	2 ac	15,000 /ac	24,450		
				1,374,450	
PROFESSIONAL FEES					
Professional Fees		8.00%	3,346,845		
				3,346,845	
DISPOSAL FEES					
Sales Agent Fee		2.00%	1,347,600		
				1,347,600	
FINANCE					
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)					
Land			(105,374)		
Construction			6,402,315		
Total Finance Cost				6,296,941	
TOTAL COSTS				**56,149,993**	
PROFIT					
				11,230,005	

Performance Measures	
Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 4: Developer-led (Off-campus) PBSA Development 100-bed Typology Appraisal (Excluding Modified Policy H7 OSFC) with Funding Yield at 5.25% (Sensitivity)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227

NET REALISATION				**10,695,227**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			7,307	
				7,307
Agent Fee		1.00%	73	
Legal Fee		0.80%	58	
				132
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	213,905	
				213,905
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			1,302	
Construction			584,710	
Total Finance Cost				586,012
TOTAL COSTS				**8,912,689**
PROFIT				
				1,782,538

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

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Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

Prime Yield Guide – March 2023

Knight Frank Intelligence

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LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond

BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

Did you know

In addition to valuing assets in the main property sectors and having award winning teams in the Healthcare, Student and Automotive sectors, Knight Frank also has expertise in :

- Waste and Energy
- Infrastructure
- Garden Centres
- Film Studios
- Serviced Offices
- Data Centres
- Life Sciences
- Income Strips
- Ground Rents
- Trading assets
- Expert Witness
- IPOs

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We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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Knight Frank Research Reports are available at **knightfrank.com/research**

JLL SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

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CBRE

Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

BCIS®

£/m2 study

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

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures	
Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			409,788	
				409,788
Stamp Duty			9,989	
Effective Stamp Duty Rate		2.44%		
Agent Fee		1.00%	4,098	
Legal Fee		0.80%	3,278	
				17,366
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				14,687,885
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			92,674	
Construction			1,487,163	
Total Finance Cost				1,579,837
TOTAL COSTS				**18,716,658**
PROFIT				
				3,743,332

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000

NET REALISATION	**39,305,000**

OUTLAY

ACQUISITION COSTS				
Residualised Price			379,270	
				379,270
Stamp Duty			8,463	
Effective Stamp Duty Rate		2.23%		
Agent Fee		1.00%	3,793	
Legal Fee		0.80%	3,034	
				15,290
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				25,683,014
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			99,231	
Construction			3,040,130	
Total Finance Cost				3,139,361
TOTAL COSTS				**32,754,167**
PROFIT				
				6,550,833

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(376,826)	
				(376,826)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				1,374,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(105,374)	
Construction			6,402,315	
Total Finance Cost				6,296,941
TOTAL COSTS				**56,149,993**
PROFIT				
				11,230,005

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY	CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227

NET REALISATION				**10,695,227**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			7,307	
				7,307
Agent Fee		1.00%	73	
Legal Fee		0.80%	58	
				132
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	213,905	
				213,905
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			1,302	
Construction			584,710	
Total Finance Cost				586,012
TOTAL COSTS				**8,912,689**
PROFIT				
				1,782,538

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #344

COMPLETE

Started:	Monday, March 27, 2023 4:34:37 PM
Last Modified:	Monday, March 27, 2023 4:35:52 PM
Time Spent:	00:01:14
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

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Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

EX/CYC/107/3 - Student Housing Policy H7 Note August 2022

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Please attached document

O'Neill ASSOCIATES
Chartered Town Planning Consultants

City of York Local Plan Modifications Consultation 27 March 2023

Response on behalf of Helmsley Group and Foss Argo Developments Limited

Consolidated Main Modifications January 2023: Modification **Refs. MM5.17 and MM5.18**

Policy H7: Off Campus Purpose Built Student Housing

1) INTRODUCTION

1.1 These representations are made on behalf of Helmsley Group and Foss Argo Developments Limited in response to the City of York Local Plan Modifications Consultation March 2023. Specifically, the representations relate to modification refs. MM5.17, MM5.18 of the Consolidated Main Modifications January 2023, and EX/CYC/107/3 - Student Housing Policy H7 Note August 2022

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

1.3 Modification MM5.17 relates to ***Policy H7: Off Campus Purpose Built Student Housing.*** Modification MM5.18 relates to modification of the Explanation text in §5.47. EX/CYC/107/3 - Student Housing Policy H7 Note August 2022 provides the evidence base to justify the requirement for affordable housing contributions.

1.4 Student housing was included in the Examination in Public Phase 3 Matter 3 in July 2022. Since that discussion a significant number of modifications to policy H7 and explanatory text are proposed, particularly focusing the policy for off campus provision only, and a requirement for affordable housing contributions.

2) DETAILED REPRESENTATIONS

The need for independent PBSA providers

2.1 Private PBSA plays a vital role in meeting student housing needs in York, independent of the Universities. The first paragraph of policy H7 acknowledges this *"in assessing need, consideration will be given to off campus provision and the capacity of independent providers of bespoke student housing in the city"*

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2.2 The need for PBSA within York is undisputed by all parties, including the Council. The need derives from the growth of both York St John University and the University of York, as well as meeting the needs of existing student numbers. The Council has accepted that there is current need, due to a persistent deficit of provision in recent years, and a need to provide for future growth in student numbers, in its determination of a number of recent planning permissions through the application e.g. Mecca Bingo, Fishergate YO10 4AR21/01605/FULM dated 25 April 2022 (275 units); Alton Cars, James Street, YO10 3WW 22/00367/FULM dated 9 May 2022 (303 units), amongst others.

2.3 Student housing need is met through a combination of university accommodation, HMOs, the private PBSA sector, students living in their own permanent home, rented or owned, and some stay in the parental home. The choice is mainly down to economic, social and geographical reasons.

2.4 Evidentially, private PBSA already plays an important role in meeting student housing need, and the importance of private PBSA is likely to increase given the growth in student numbers. However, whilst the University of York is continuing to build accommodation for its students, and draft local plan Policy ED1 and ED4 promotes the provision of on-site accommodation for the University of York, accepting that student housing for York St John University will need to be provided off-campus, there is significant demand from students to live off-campus and not within university-controlled accommodation, particularly after their first year.

2.5 In York, the future supply of HMO's to provide for the growth in student numbers is restricted by:

- draft local plan policy H8 which seeks to control the density of HMOs in any street or neighbourhood for the benefit of existing residents;
- the Article 4 direction covering the whole urban area of York removing permitted development rights that allow dwellings to convert to HMOs; and
- competition from holiday lets which are often more lucrative for landlords and face fewer planning constraints since, in most instances, holiday lets remain as a C3 use class.

2.6 Provided there is sufficient land identified to meet need, private PBSA plus on-campus accommodation may reduce the need for further HMOs, which typically remove family homes from the housing stock which is contrary to local plan objectives. These factors are likely to compound the persistent deficit of provision of PBSA in recent years for existing and future student numbers.

2.7 MM5.17 has the effect of binding private PBSA providers to universities through the requirement for nomination agreements, effectively making them development partners.

Nomination Agreements

2.8 It is understood that nominations agreements are unworkable in York. Our clients have been unable to agree such terms with education providers in the past. Nomination agreements or similar contractual arrangements are commercially sensitive, and require the education provider to assume some of the risk of independent providers, and may not be willing to enter into them therefore. The requirement for nominations agreements as part of MM5.18 therefore presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York.

2.9 In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.

Affordable housing contributions

12.10 MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS). EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound. The CVS is also considered by CBRE as part of the evidence submitted in response to this consultation, and the CVS is itself outdated and misrepresentative of current market conditions. Notwithstanding it is EX/CYC/107/3 that forms part of the local plan evidence base, and is the subject of this consultation not the CVS. Through the publication of the CVS, the Council itself, accepts that EX/CYC/107/3 is unreliable and outdated.

12.11 Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for affordable student accommodation for which there is an identified need, as set out below. The plan is not positively prepared in this regard. Affordable housing need should be met through an appropriate level of housing allocations to provide the certainty of housing deliverability required by the NPPF, and local plan targets.

12.12 Students are being significantly affected by the rise in the cost of living as are households. A survey for the Russell Group Students' Union published in March 2023 pinpointed the problems experienced by students, (Report appended to this representation). In data taken from 8,800 responses the report found: -

- 94% of students are concerned about cost-of-living crisis
- 1 in 5 are considering dropping out
- 1 in 4 are regularly going without food and necessities
- Maintenance loans have been frozen. University leaders say Government forecasts have been inaccurate in each year since 2020-21 and with no mechanism in place to correct for inflation. This means "significant real-terms cut" has been baked into the system.

12.13 Those from lower income families are severely impacted.

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

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

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

12.14 The proposed affordable housing contribution formula in MM5.17 is invalid because it has not been demonstrated that PBSA can support the level of affordable housing contributions required, and any affordable housing contribution will directly take away the ability of developers with or without the Universities involvement from providing affordable student bedrooms.

Viability

12.15 The proposed obligation to contribute to affordable housing currently equates to £7k/bed. This obligation would necessarily be recouped from rental charges. Since rent is a significant proportion of expenditure for students, this would have a major impact on students.

12.16 EX/CYC/107/3 prepared by Porter Planning Economics, is unreliable and fundamentally flawed and has been superseded by the Council's CIL evidence which is also subject to consultation. Even based on the Council's CIL viability study prepared by Porter Planning Economics, the CBRE evidence submitted as part of these representations demonstrates that there is insufficient viability headroom for PBSA to make contributions towards affordable housing. NPPF (2012) 173. States that "*Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable*."

Vacant building credit (VBC)

12.17 To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount. The policy being upheld by the Court of Appeal in West Berkshire v SoSCLG6, in July 2018, VBC was included in NPPF §63 and is retained in NPPF (July 2021) §64.

Flexibility within policy H7

12.18 The Council accept that there is a strategic need to provide purpose-built accommodation within the city. However, the policy must endure for the plan period and needs to be sufficiently flexible. Need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding.

12.19 Furthermore, Student housing will need to be available flexibly 365 days of the year to provide for these other modes of learning delivery and new markets e.g. deliver modules flexibly via short courses and CPD programmes. Delivery of CPD programmes will also require short term accommodation.

12.20 In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students. A number of important groups would be unjustly excluded from accessing PBSA such as students who bring family members with them, whether from overseas, or because they are parent or single parents.

12.21 There also needs to be flexibility to allow for educational conferences, summer schools, etc. This will enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development, policy H7 should allow the temporary use of accommodation during vacation periods for ancillary uses. Examples of such uses, amongst others, include providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses at a higher education provider or any institution approved in advance by the Council. Conditions can be applied to ensure the temporary use should not disrupt the accommodation of the resident students during their academic year, and to ensure that any ancillary use does not result in a material change of use of the building.

3) REMEDY

3.1 **Our clear position, based on detailed viability evidence submitted as part of these representations, is that PBSA cannot support affordable housing contributions. MM5.17 is unsound and all references within policy H7 to affordable housing contributions should be removed. In this regard, revised wording to Policy H7 is suggested below:**

Policy H7: Off Campus Purpose Built Student Housing

The University of York and York St. John University must address the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to off campus provision and the capacity of independent providers of bespoke student housing in the city.

To meet any projected shortfall, provision by the University of York can be made on either campus. Provision by York St. John University is expected to be off campus but in locations convenient to the main campus.

SH1: Land at Heworth Croft, as shown on the proposals Policies Map, is allocated for student housing for York St. John University students.

Proposals for new off campus purpose built student accommodation, other than the allocation at SH1, will be permitted where all of the following criteria are satisfied:

I. *it can be demonstrated that there is a need for purpose-built student ~~housing~~ accommodation which cannot be met on campus. Allowing the temporary use of accommodation during vacation periods for ancillary uses will also be considered; ~~and~~*

II. *it is in an appropriate location for education institutions and accessible by sustainable transport modes;*

~~iia~~ *~~The rooms in the development are secured through a nomination agreement for occupation by students of one or more of the University of York and York St. John University; and~~*

III. *the development would not be detrimental to the amenity of nearby residents and the design and access arrangements would have a minimal impact on the local area; and*

IV. *~~The accommodation shall be occupied only by full-time students enrolled in courses of one academic year or more and c~~ Conditions or obligations shall be imposed to secure occupation of a majority of rooms by students[1] of one or more higher education providers[2] during the academic year, ~~compliance with this requirement and for~~ the proper management of the ~~properties~~ accommodation, and to ensure that any ancillary use does not result in a material change of use of the building.*

~~For new student accommodation a financial contribution, or should be secured towards delivering affordable student accommodation or affordable housing.~~

~~The affordable contribution will be calculated on a pro rata basis per bedroom using the following formula:~~

~~Average York Property price – Average York Fixed RP Price x 2.5% = OSFC per student bedroom~~

[1] For the implementation of this policy a student is a person following a course in higher education as recognised by the Office for Students

[2] A higher education provider is defined as an education institution that provides a designated course that has been approved by the Department for Education for higher education study which allows the student to apply for government-financed student loans. Higher education study is at qualification Level 4 or above (i.e. above A-level or equivalent). Further information on qualification levels can be found here: https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels. The Office for Students provides a register listing all the English higher education providers that it officially recognises, which can be found at https://www.officeforstudents.org.uk/advice-andguidance/the-register/the-ofs-register/. This register can be used to determine if a higher education provider delivers designated courses and thus satisfies the above definition

~~The contribution will be required only from the number of units creating a net gain. For mixed-use developments of student accommodation with general housing a pro-rata approach will be used to determine whether a contribution is required, and how much this should be. Contributions towards affordable housing provision from new student accommodation will not be sought where the student accommodation site which at the date of adoption of the Plan is owned by a university and which will continue to be owned by a university to meet the accommodation needs of its students.~~

~~Where a developer considers the contribution cannot be fully met they should justify the level of provision proposed through an open book appraisal to demonstrate to the Council's satisfaction that the development would not otherwise be viable.~~

~~Developers may not circumvent this policy by artificially subdividing sites, and are expected to make efficient use of land.~~

City of York Local Plan Proposed Modifications Consultation Feb 2023

Technical representation prepared by CBRE UK Ltd jointly on behalf of the following:

- Foss Argo Developments Ltd
- Helmsley Group Ltd

March 2023

Contents

Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by a consortium of two developers ('the consortium'), each with land and property interests in York, to prepare a formal representation document setting out a technical response to the City of York Council ('CYC') Local Plan Proposed Modification Consultation February 2023 ('the Local Plan consultation').

2. CBRE's instruction relates specifically to CYC's proposed modifications to Policy H7: Off Campus Purpose Built Student Housing.

3. CBRE's technical representations focus upon the evidence base underpinning CYC's proposed modifications to Policy H7, namely:

    a. EX/CYC/107/2 - Affordable Housing Note August 2022: This document is titled the CYC Student Housing Policy H7 Note August 2022 ('the Policy H7 Note'). It is also accompanied by a technical note (as follows)

    b. EX/CYC//107/2 – Appendix 1: This document is titled the CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7, and is dated 22 August 2022 ('the Technical Note').

4. However, it is important for CYC to be aware that the Technical Note that underpins the Policy H7 Note has subsequently been superseded by the publication for consultation of the City of York CIL Viability Study Final Report ('CIL Viability Study'), also produced by Porter Planning Economics ('PPE') and dated December 2022.

5. The CIL Viability Study was published by CYC as part of the evidence base accompanying the Community Infrastructure Levy ('CIL') Draft Charging Schedule consultation, running to 27 March 2023.

6. As the CIL Viability Study supersedes the earlier Technical Note, CBRE is required to have due regard to both documents, and cross-references accordingly within this representation[1].

7. An overarching representation to the Local Plan consultation has been prepared by York-based town planning consultancy O'Neill Associates.

[1] Note: CBRE has also made technical representations to the CYC CIL DCS consultation on behalf of the consortium. CBRE recommends that CYC reviews both sets of representations in parallel.

The Consortium

8. The consortium consists of the following developers, each with existing land and property interests within York:

   – Foss Argo Developments Ltd
   – Helmsley Group Ltd

The Consortium's Stance

9. The consortium has fundamental concerns regarding CYC's proposed modification to Policy H7 to introduce an off-site financial contributions ('OSFC') to traditional affordable housing secured from off campus PBSA development.

10. Specifically, the modification proposes the use of an adjusted version of the OSFC formula set out in Policy H7, which applies the number of student bedrooms. The rate of 2.5% affordable housing equivalent per student bedroom. Whilst the Technical Note applied an OSFC of £5,212 per student bedroom in testing the impact on financial viability, this has subsequently been uplifted to £7,000 per student bedroom as applied within the CIL Viability Study, and represents the latest OSFC sum.

11. It is the consortium's firm view that the introduction of the proposed OSFC to off campus PBSA development 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.

12. In light of above the consortium does not accept the validity and reliability of the published viability evidence base upon which the proposed PBSA OSFC relies.

Matters of Representation

Purpose

13. This section of the document sets out the matters of representation that the consortium determine must be raised with CYC.

Significance of Proposed OSFC

14. The OSFC proposed for off campus PBSA development represents a significant additional cost to development of this typology, at circa £7,000/student bedroom.

15. In addition, CYC has also consulted on a CIL DCS, which proposes to add a further charge of £50/m^2 to off campus PBSA developments delivering 100 student bedrooms or fewer. This means development of this scale will incur both the OSFC and CIL liability.

16. These are not incremental changes, but rather represent a fundamental shift to introduce substantial costs on development.

Illogical Timing

17. The UK property market is experiencing a highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally over 2022 and which is expected to prevail over the course of 2023. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Development and investment across a wide range of sectors are facing headwinds, which commenced in mid-2022 and continue to prevail during 2023.

18. Specifically:

    a. Economic output and outlook has deteriorated as the inflationary squeeze on real incomes weighed on consumer confidence and spending that hit growth momentum. Throughout 2023, CBRE expect unemployment to rise from its current historically low level. In tandem, job vacancies will decrease. Wage growth will not be able to keep up with inflation until late 2023, eroding consumer purchasing power. We expect a moderate recession to occur in 2023, with GDP falling by 0.9%.

    b. Inflation has been rising relentlessly over the past 18 months and is at its highest for 40 years. Inflation has been driven by a post-COVID surge in demand, which could not be met due to supply bottlenecks. Russia's war in Ukraine has exacerbated supply shortages, pushing energy, food, and other commodity prices even higher. Policy choices, such as China's zero-COVID policy, are slowing down the recovery of supply chains, and raising the costs of imported durable goods. In the UK, inflation has been exacerbated by a weak pound, which has made imports more expensive to the UK consumer.

    c. Increased global supply chain disruption has and will continue to put further upward pressure on energy prices, food prices and construction materials. Significant uncertainty persists around the future path of inflation. Inflation remains stubbornly high in early 2023, with the Consumer Prices Index (CPI) rising by 10.4% in the 12 months to February 2023, up from 10.1% in January. CBRE's base case is that CPI inflation will have peaked in Q4 2022 and fall back in the second half of 2023. Implicit in this forecast is the end of the Ukraine conflict by year end with energy - and non-energy commodity prices falling from their current highs.

    d. Monetary tightening is well underway over fears of second-round effects from wage and price-setting. During 2023, the Bank of England will continue to rise interest rates, which CBRE forecast to peak at around 4.5% and push borrowing costs to the highest levels prior to the financial crisis in 2008. As inflation begins to cool, rates will begin to decrease, declining gradually to a 'new normal' of around 2% from 2026 onwards.

    e. Faced with spiraling prices and higher interest rates on loans, businesses and consumers are limiting spending. Consumer confidence has been hit, and retail sales will continue to decline until inflation moderates and consumers restore their purchasing power. Businesses will have to cut costs to preserve margins in a high-inflation environment. This will lead to some job losses and higher unemployment in the first half of 2023.

    f. The 10-year gilt yield has risen by almost 200bps since the beginning of 2022 and financial conditions are materially tighter than in Q2 2022. The expectation of future short-term interest rate hikes will continue to push upward on long-term market interest rates until the base rate starts to move down.

    g. Inflation and rising interest rates have resulted in an increase in property yields. This ongoing yield shift, which commenced from Q3 2022 has hit values and returns for investors. As the cost of capital, closely related to the interest rates of central banks and therefore to inflation, have risen, valuations have been negatively impacted.

19. Specifically considering the PBSA sector, CBRE's baseline forecast for 2023 is as follows:

a. Overall, the sector continues to be undersupplied but this is highly nuanced, and an understanding of affordability is key. An in-depth understanding of the submarket dynamics is critical.

b. Investment yields have softened in H2 2022 and high inflation and rising interest rates will continue to impact the investment and funding market over 2023 and into 2024, until inflation abates and central banks pivot on interest rates.

c. Overall, the development of new PBSA is slowing due to a combination of factors, and this will carry forward throughout 2023. Specifically, the drivers are as follows:

i. Rising build costs present viability challenges

ii. The pace of the planning system remains a significant barrier to delivery

iii. Rising operational costs will also continue to hinder new development given the negative impact on net rental income.

iv. Development financing is also increasingly expensive and is increasingly difficult to obtain.

20. CBRE questions the logic and rationale, and efficiency in use of public funds, for introducing additional costs on PBSA development via an OSFC in addition to a CIL regime with high charges set on PBSA developments at this juncture, given the wider challenges facing development and uncertainty in both the macro-economy and property market.

21. CYC's proposals to increase the cost burden on development at this point will exacerbate uncertainty and slow or stall development and regeneration plans on major sites across the city for PBSA development.

Outdated Evidence

22. As referenced prior, the published evidence used to inform and underpin the introduction of the OSFC is as follows:

a. EX/CYC/107/2 - Affordable Housing Note August 2022: This document is titled the CYC Student Housing Policy H7 Note August 2022 ('the Policy H7 Note'). It is also accompanied by a technical note (as follows)

b. EX/CYC//107/2 – Appendix 1: This document is titled the CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7, and is dated 22 August 2022 ('the Technical Note').

23. However, this evidence is now outdated and has been superseded by the CIL Viability Study produced by PPE and dated December 2022.

24. This presents viability testing of the off campus PBSA typologies that arrives at fundamentally different results to the EX/CYC//107/2 – Appendix 1 Technical Note.

25. Consequently, CYC should no longer be relying upon EX/CYC//107/2, as it represents a flawed evidence base given that property market conditions have shifted significantly since its publication and it has been superseded by other evidence published by CYC.

26. Given this, CBRE focuses analysis on the more recent evidence on the financial viability of PBSA typologies in respect of both the proposed OSFC and CIL charging, as set out within the CIL Viability Study.

27. This said, CBRE also considers that the CIL Viability Study itself is outdated and misrepresentative of current market conditions.

28. CBRE has reviewed the CIL Viability Study in detail. It is apparent that the input assumptions for PBSA scheme typologies, which are subsequently utilised by PPE in undertaking the viability modelling, analysis, conclusions and recommendations rely substantially upon evidence from Q1-2 2022.

29. As set out above, and well-documented, have been significant macro-economic headwinds and property market adjustment issues over the period since, as well as substantive ongoing construction cost inflation, which are material considerations that any robust viability evidence base must account for.

30. In addition, the Government is conducting a staged implementation of the Building Safety Act 2022, and has stated that it expects student accommodation to be subject to the regulatory regime under Part Three, which will have implications for the design and construction of new developments.

31. The Government has also recently consulted upon amendments to Approved Document B, which proposes that all new buildings of 30m (circa 10 storeys) or above will require a second separated staircase[2]. The Greater London Authority ('GLA') has pre-empted the Government's conclusions by mandating this requirement for new development in Greater London with immediate effect.

32. The Government is currently considering responses following closure of the consultation on 17 March 2023, but it is widely anticipated that student accommodation will be required to conform to the amendments, which is prompting developers and investors to factor second staircases into plans for new development going forward in order that they can meet regulations, and be insurable, investable and deliverable. Specifically, Government states:

    "58. Recognising that many schemes are in development, and this change would represent a significant change, we are proposing a very short transition period before implementing the changes.

    59. The transition period will allow time for schemes to be completed but should not allow the opportunity for developments to get off the ground ahead of the new requirements coming into effect.

    60. We would encourage all developments to prepare for this change now."

33. Based on the impact assessment conducted, the Government has publicly acknowledged that the implications of additional construction costs, and loss of build efficiency, will impact negatively on the financial viability of development and, as a result, is likely to reduce the propensity of higher density schemes to deliver affordable housing as a consequence:

    "65. The costs of a second staircase will also impact the viability of high rise buildings, this is likely to reduce the amount of affordable housing that can be provided by developers."

34. The impact will be that gross to net build efficiency is reduced, meaning lower net lettable floorspace against a higher or equivalent gross internal area (GIA).

[2] https://www.gov.uk/government/consultations/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings

35. It does not appear that the CIL Viability Study has accounted for the this or addressed the implications and it certainly has not been referenced in the earlier EX/CYC//107/2 – Appendix 1 Technical Note.

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

Technical Deficiencies

37. As stated, due to the EX/CYC//107/2 – Appendix 1 Technical Note now being outdated and superseded, CBRE focuses analysis on the more recent evidence on the financial viability of PBSA typologies in respect of both the proposed OSFC and CIL charging, as set out within the CIL Viability Study.

38. This is possible given that the CIL Viability Study accounts for the proposed OSFC within viability modelling, and also tests the viability of the PBSA typologies both with (primarily) and without the proposed OSFC in order to demonstrate the implications.

39. There are a range of detailed technical issues identified, which render the CIL Viability Study as an inadequate basis for CYC utilizing to underpin justification for the OSFC (in addition to CIL charging):

    a. **Rents, Yields and Capital Values for PBSA Typologies:**

        i. CBRE noes not disagree with the CIL Viability Study's usage of the average gross rental income of £177/week to be applied to private sector off campus development typologies for the 2022/23 academic year.

        ii. OPEX is deducted at 30% of gross annual rent to generate a net rental income, which is capitalized at an investment yield of 5.0%. This is stated as generating a capital value of £112,300 per room.

        iii. The CIL Viability Study cites, at para 3.75 that the above capital value is a "*cautious sales value for the sole purpose of this planning viability assessment*".

        iv. CBRE notes that this observation is based on evidence obtained from a Cushman & Wakefield report (non-York specific) drawing on data from H1 2022. It therefore does not represent current market conditions.

        v. Analysing York specifically, there are relatively few recent transactions for which information is available. These are as follows and demonstrate a tone of circa 5.5%-6.5% NIY and capital value of circa £90,000-£100,000 per bed:

            1. 62 Layerthorpe: comprising 98 beds transacted in 2019 on a forward fund / commit to iQ Student Accommodation for a total capital value of £92,000 per bed.

            2. Haxby Road City Residential: comprising 124 beds transacted in 2018 on a stabilized investment basis at a NIY of 6.5%, reflecting £60,000 per bed.

            3. Foss Studios: comprising 220 beds transacted in 2017 on a stabilized investment basis at a NIY of 5.7%, reflecting £106,000 per bed.

        vi. The above capital values would suggest that the sum of £112,300 per room adopted in the CIL Viability Study actually exceeds transactional evidence available for York in recent years.

        vii. 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.

viii. On the basis of the above, CBRE ranks York as a Prime Regional location for PBSA and understand that other agents such as JLL and Knight Frank regard the city on an equivalent basis.

ix. As stated earlier in this document, investment yields have softened since Q3 2022 due to wider macro-economic conditions, and continue to trend weaker in a high interest environment. The latest available investment yield sheets now record Prime Regional PBSA yields as follows:

1. JLL Monthly Yield Sheet: PBSA Prime Regional at 5.25% in January 2023 (softening from 5.0% in Q3-4 2022[3].
2. Knight Frank Prime Yield Guide – March 2023: PBSA Prime Regional at 5.0% - 5.25% (softening from 4.75%-5% in Q3 2022)[4].
3. CBRE UK Living Sectors Investment Yields – March 2023: PBSA Prime Regional at 5.0% and trending weaker (softening from 4.75% in Q3 2022)[5].

x. In summary, three respected agents all report PBSA Prime Regional yields softening to 5.0% - 5.25% at present day. Importantly, these are not development funding yields, but are stabilized investment yields.

xi. Institutional forward funding has been one of the main delivery routes for financing the development of PBSA schemes in York and elsewhere across the regions, where brought forward by the private sector (i.e. non-University). CBRE's market intelligence is that funding yields are transacting at a discount of circa 25bps in comparison to stabilized investment yields. As a result, if the rates above are adjusted for development funding, this would see yields at 5.25% - 5.5%.

b. **Construction costs**:

i. The construction costs adopted are set out in Table 5.3 on p.49 are cited as being drawn from RICS BCIS. The source data is referenced as being provided in Appendix D. The RICS BCIS cost is cited as £2,112/m^2 (£196/ft^2) and base-dated at Q3 (i.e. Jul.-Sept.) 2022.

ii. Given that circa 6 months has passed since the construction costs were base dated, CBRE has reviewed the RICS BCIS data as published at 11 March 2023. On an equivalent basis the RICS BCIS median cost now stands at £2,166/m^2 (£201/ft^2), which is an increase of 2.6%. The data is provided within **Enclosure 2**.

[3] Note: this is provided within **Enclosure 1**.
[4] Note: this is provided within **Enclosure 1**.
[5] Note: this is provided within **Enclosure 1**.

iii. CBRE comment that the RICS BCIS costs of £2,166/m^2 (£201/ft^2) are extremely low in the context of PBSA developments being brought forward for delivery in regional cities in the current market, and would highlight that RICS BCIS is a significantly lagging indicator due to the time taken for tender data be provided and reporting updated. Hence, in an inflationary environment over 2022 and 2023, it has consistently underestimated construction costs being generated in real-time. Moreover, as mentioned prior, RICS BCIS will not yet account for changes to fire safety guidance (Approved Document Part B).

iv. CBRE notes that the CIL Viability Study also cites in para. 5.10 that additional allowance of 15% of build costs for external site works such as utilities, car parking and landscaping is provided.

v. However, reviewing the example 100-bed typology appraisal in Appendix A confirms that there is an error, whereby the viability appraisals only account for a 10% external works cost, which means that there is an omission in the viability testing of this typology of at least £280,262.50. This is greater than the entirety of the CIL headroom of £223,666, which would significantly alter the conclusions and recommendations of the CIL Viability Study. In essence, if corrected, it would eradicate any headroom at all for CIL on Typology 10a or 10b alongside the proposed OSFC, and CIL would require reducing to NIL for these typologies. As a result, the charging rate of £50/m^2 proposed within the CIL DCS for "*Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution*" would be required to be removed altogether via modification.

vi. In a further apparent error, the 100-bed typology appraisal in Appendix A contains only 8% professional fees, as a cost allowance. However, para. 5.10 states clearly that modelling allows for " *10% of build costs and externals for professional fees associated with the build, including architect fees, planner fees, surveyor fees, and project manager fees*". This means a further cost omission within the viability testing of the PBSA typologies, which will further reduce the viability of this use if reintroduced to the viability appraisals for each PBSA typology.

vii. CBRE has set aside the above points, pending clarification from CYC.

viii. Taking a stand back approach, CBRE's cross-section of market intelligence in the sector is that the current minimum construction cost for developer-led mid-specification PBSA schemes in the regions, equates to circa £85,000 per bed. It is CBRE's direct experience that higher specification schemes, which seek to secure higher rents from students (and which primarily target the international student market) are incurring far higher costs.

ix. In **Table 2** overleaf, CBRE has set out both a comparison between the RICS BCIS median rate costs as at Q3 2022 and March 2023. CBRE considers these costs to be more likely representative of construction to a low-mid specification product, which would achieve a lower than average rental price point in the York market. As the definition in RICS BCIS states it would therefore be more appropriate to reflect student halls of residences (i.e. university-led on campus development), rather than the higher specification product being delivered off-campus by private developers, and those which can secure rents at an average for York (i.e. the £177/week) or above.

x. CBRE notes that the RICS BCIS upper quartile rate (£2,389/m^2 | £222/ft^2) generates a construction cost, when allowing for external works, that is commensurate with the level of costs being seen for mid-market specification PBSA schemes in the regions (at circa £84,500/bed). This is provided for comparison in **Table 2**.

xi. For the reasons set out above, CBRE strongly advocates that the RICS BCIS upper quartile rate should represent the base construction cost for viability testing developer-led (i.e. off campus) PBSA typologies. The median rate simply isn't a realistic cost benchmark to adopt for this purpose in the current market.

Table 2: Comparison Analysis: RICS BCIS Costs Q3 2022 vs. Q1 2023 vs. Minimum Market Rates (CBRE Q1 2023)

RICS BCIS Median Q3 2022			Build			External Works		Total Costs (Build + Externals)			
						@	10%				
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,112	196	19,288	40,736,256	600	67,894	4,073,626	6,789	44,809,882	74,683	2,323	216
2,112	196	11,251	23,762,112	350	67,892	2,376,211	6,789	26,138,323	74,681	2,323	216
2,112	196	6,429	13,578,048	200	67,890	1,357,805	6,789	14,935,853	74,679	2,323	216
2,112	196	3,215	6,790,080	100	67,901	679,008	6,790	7,469,088	74,691	2,323	216

RICS BCIS Median Q1 2023			Build			External Works		Total Costs (Build + Externals)			
						@	10%				
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,166	201.2	19,288	41,777,808	600	69,630	4,177,781	6,963	45,955,589	76,593	2,383	221
2,166	201.2	11,251	24,369,666	350	69,628	2,436,967	6,963	26,806,633	76,590	2,383	221
2,166	201.2	6,429	13,925,214	200	69,626	1,392,521	6,963	15,317,735	76,589	2,383	221
2,166	201.2	3,215	6,963,690	100	69,637	696,369	6,964	7,660,059	76,601	2,383	221

RICS BCIS Upper Quartile Q1 2023			Build			External Works		Total Costs (Build + Externals)			
						@	10%				
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,389	221.9	19,288	46,079,032	600	76,798	4,607,903	7,680	50,686,935	84,478	2,628	244
2,389	221.9	11,251	26,878,639	350	76,796	2,687,864	7,680	29,566,503	84,476	2,628	244
2,389	221.9	6,429	15,358,881	200	76,794	1,535,888	7,679	16,894,769	84,474	2,628	244
2,389	221.9	3,215	7,680,635	100	76,806	768,064	7,681	8,448,699	84,487	2,628	244

Source: RICS BCIS / CBRE Data

c. **Site Areas for Typologies**: It is not clearly stated within the CIL Viability Study as to how the site areas applied for each typology were derived and the evidence used to inform this. Given this is an important basis for setting benchmark land values, CBRE requests that this information is provided by CYC to provided transparency and clarity to stakeholders.

d. **Benchmark Land Value**:

i. The CIL Viability Study includes the adopted BLVs for non-residential uses within Table 5.6 on p.52. However, the document contains no supporting justification or evidence to underwrite the proposed BLVs, which CBRE considers a significant omission.

ii. The CIL Viability Study proposes a BLV of £1.5m/ha (£607,000/acre) as the BLV to apply to PBSA typologies.

iii. In order to find justification for this BLV, CBRE has had regard to the earlier EX/CYC//107/2 – Appendix 1 Technical Note. An explanation is provided in paras 20-23.

iv. 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 EX/CYC//107/2 – Appendix 1 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.

v. CBRE is not aware of any abandoned, unviable or dilapidated industrial premises that could be redeveloped for PBSA use. There is presently a limited supply of sites suitable for redevelopment for PBSA uses across the city, which necessitates PBSA development competing with other forms of prospective development including hotels, traditional residential, elderly persons accommodation or offices.

vi. CBRE is therefore unclear on the logic behind Table 5.6 in the CIL Viability Study, on p.52. This is replicated below. It sets a substantially lower BLV for PBSA development in comparison to competing uses such as Hotel and Care Home uses (both £2m/ha), supermarket use (£2m/ha) and retail warehouse use (£2m/ha).

Table 5.6 Benchmark land values for non-residential existing uses

Typology	BLV per gross area
1: Town centre office	£1,500,000
2: Business park	£1,000,000
3: Industrial / warehouse	£850,000
4: Small local convenience	£2,000,000
5: Supermarket	£2,000,000
7: Retail warehouse	£2,000,000
8: City Centre retail	£4,000,000
9: Hotel (60 beds)	£2,000,000
10: Student accommodation	£1,500,000
11. Care home (60 bed)	£2,000,000

vii. In addition, CBRE also notes that the CIL Viability Study adopts a BLV for residential typology viability testing of £1.7m/ha for brownfield land in its existing use as 'City centre / extension' land within Table 4.15 on p.47.

viii. The CIL Viability Study does not adequately justify why competing brownfield land uses have been viability tested against a higher BLV and PBSA against a lower BLV. This warrants further explanation by CYC.

ix. 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.

x. A rational approach would be for BLVs for this use to be considered by way of market transactional analysis of sites brought forward for PBSA use within the city of York in recent years. CBRE recommends that CYC seek to source and consider such evidence in taking a 'stand back' approach and a York-specific market sense-check.

Results & Re-appraisal

40. The CIL Viability Study sets out the results of viability modelling within Table 7.1 on p.61. This is replicated below for ease.

Table 7.1 Recommended non-residential psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of		
		50%	33%	25%
1: Town centre office	-£1,034			
2: Business park	-£906			
3: Industrial / warehouse	-£333			
4: Small local convenience	£154	£77	£103	£115
5: Supermarket	-£117			
7: Retail warehouse	£134	£67	£90	£101
8: City Centre retail	-£68			
9: Hotel (60 beds)	-£143			
10a: Student accommodation - 25 bed	£127	£64	£85	£95
10b: Student accommodation - 100 bed	£84	£42	£56	£63
10c: Student accommodation – 200 bed	-£16			
10d: Student accommodation - 350 bed	-£50			
10e: Student accommodation - 600 bed	-£152			
11. Care home (60 bed)	-£937			

41. Whilst the CIL Viability Study only appends a summary viability appraisal for PBSA typology 10b, Table 7.1 clearly demonstrates PPE's headroom analysis concludes that only PBSA typologies 10a and 10b can viably accommodate both any CIL and a 2.5% affordable housing equivalent OSFC contribution per student bedroom.

42. This is notwithstanding CBRE and the consortium's representations that the conclusions within Table 7.1 and the CIL Viability Study are they themselves outdated and don't reflect deterioration in market conditions since Q3/4 2022.

43. With this in mind, Table 7.1 of the CIL Viability Study shows PBSA typologies 10c – 10e to all fall below the threshold of financial viability. This means they cannot accommodate any CIL, as there is no headroom, but critically these PBSA typologies are also demonstrated as generating negative headroom (shown in red) before charging of any CIL.

44. The off campus PBSA typologies already incorporate the OSFC cost of £7,000 per student bedroom. This means that the CIL Viability Study now determines that these off campus PBSA typologies are now unable to partially or fully meet the proposed OSFC costs of Policy H7 whilst remaining financially viable – as they generate negative headroom **before** incurring CIL.

45. It is no longer possible to discern from CYC's published evidence base where the threshold for viability actually sits in relation to the propensity of these PBSA typologies to be able to accommodate any OSFC costs.

46. This evidence in the CIL Viability Study directly contradicts the Table 6 results in the earlier published EX/CYC//107/2 – Appendix 1 Technical Note. This is replicated below for ease.

Table 6 PBSA scheme viability test at CYC Local Plan full policy and different OSFC rates

Scheme type	Land type	Viability and headroom			
		0% OSFC per student room (0% per Cluster unit)	2.5% OSFC per student room (10% per Cluster unit)	5% OSFC per student room (20% per Cluster unit)	10% OSFC per student room (40% per Cluster unit)
25-bed PBSA	Brownfield	£16,025	£10,276	£4,455	-£7,662
100-bed PBSA	Brownfield	£11,884	£6,151	£417	-£11,732
200-bed PBSA - low density	Brownfield	£11,095	£5,379	-£336	-£12,385
350-bed PBSA	Brownfield	£11,088	£5,386	-£316	-£12,326
600-bed PBSA	Brownfield	£8,794	£3,111	-£2,572	-£14,627

47. In summary, the CIL Viability Study now supersedes the earlier EX/CYC//107/2 – Appendix 1 Technical Note and clearly demonstrates it is out-of-date and can no longer be relied upon by CYC.

48. In the intervening period between the EX/CYC//107/2 – Appendix 1 Technical Note being produced and the CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

49. Consequently, based on the CIL Viability Study results, there is no longer any evidenced justification for CYC seeking for off-campus PBSA schemes to provide a 2.5% affordable housing equivalent OSFC contribution per student room (particularly in 200+ bed PBSA typologies), as there is no longer sufficient 'headroom' demonstrable within the tested PBSA typologies to support this financial contribution.

50. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

51. Further elaboration is provided in PPG Viability (para. 002 ref: 10-002-20190509):

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

52. As clearly set out in both PPG and the RICS Guidance[6], the impact on viability of a CIL, whether proposed or existing, should be considered alongside the full policy requirements of the Plan – this should therefore include the demonstrable viability of PBSA typologies (off-campus) to provide a 2.5% affordable housing equivalent OSFC contribution per student room.

53. In simple terms, a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for, and taking precedence over, the introduction of CIL rate setting. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage. PPG Viability is explicit on this point, stating the following in para. 002 ref: 10-002-20190509:

"Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."

54. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed required of Policy H7 is unsound and requires removal.**

55. Noting this issue, the CIL Viability Study also runs viability testing on PBSA typologies, specifically with the cost of meeting the 2.5% affordable housing equivalent OSFC contribution per student room **removed**, to determine CIL headroom to apply to on-campus PBSA. This is replicated in the following table.

Table 7.2 Recommended on campus student accommodation, psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of		
		50%	33%	25%
10a: Student accommodation - 25 bed	£421	£211	£281	£316
10b: Student accommodation - 100 bed	£374	£187	£249	£281
10c: Student accommodation - 200 bed	£272	£136	£181	£204
10d: Student accommodation - 350 bed	£238	£119	£159	£179
10e: Student accommodation - 600 bed	£135	£68	£90	£101

56. CBRE cannot support the levels of CIL headroom being identified within Table 7.2 above for the PBSA typologies, for the reasons set out earlier within this representation.

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

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

57. Given CBRE's analysis set out above firmly highlights both technical issues with the CIL Viability Study evidence base and that market conditions have deteriorated since its publication, CBRE has run independent viability modelling on PBSA typologies to determine the implications for CIL headroom in the current market.

58. CBRE has utilised present-day input assumptions for off-campus (developer-led) PBSA development scheme typologies.

59. Firstly, CBRE has set the rental rates at £177/week to represent an average rate across the York market. OPEX is deducted at 30% of the gross annual rent to generate a net rental income. This is consistent with the CIL Viability Study inputs.

60. Secondly, CBRE has capitalised the net rental income at an investment yield of 5.0%. As set out earlier in this representation, most private-sector driven PBSA development has, and is expected to continue to be, institutionally funded. PBSA development funding yields are presently at circa 5.25% - 5.5% for prime regional locations, such as York. CBRE has taken the more optimistic stance of provisionally retaining the rate adopted in the CIL Viability Study, which represents a best case illustrative position as it would be unlikely to be achievable in today's market.

61. Thirdly, CBRE has increased the construction costs to reflect the RICS BCIS upper quartile cost as published at March 2023. This is deemed the most representative benchmark rate for current market construction costs for mid-market specification private-sector led PBSA schemes being brought forward in regional cities.

62. Fourthly, CBRE has not adjusted the external works and professional fees allowances utilised in the CIL Viability Study modelling – utilising the lower rates in the example appraisal appended to the document, rather than the higher figures referenced in the text. This therefore, again, adopts the most optimistic position absent of clarification from CYC.

63. Finally, CBRE has removed the proposed £7,000 OSFC per student bedroom from the viability modelling. The purpose therefore is to determine whether there is viability headroom to accommodate the OSFC contribution, and the level of surplus (headroom) per student room available (or deficit).

64. No CIL is allowed in addition, and is excluded.

65. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. As previously, this should not be taken as an endorsement, but is deemed reasonable and rational for the purposes of comparison – given it is not the responsibility of the consortium to prepare CYC's evidence.

66. The headroom analysis is provided overleaf. Appraisal summaries are provided within **Enclosure 3**.

Table 3: Headroom Analysis: Developer-led Off Campus PBSA Development – OSFC Headroom / Student Bedroom

		Headroom
Typology	PBSA Beds	£ OSFC / Student Room
10b	100-bed	1,084
10c	200-bed	-1,401
10d	350-bed	-2,174
10e	600-bed	-4,703

Source: CBRE

67. In summary, the analysis in Table 3 above reiterates that there is insufficient headroom for off-campus developer-led PBSA schemes to provide the affordable OSFC sought via Policy H7 (as modified). If combined with CIL liability as proposed for typologies 10a and 10b, then this would completely eradicate any headroom whatsoever (leading to the OSFC being immediately negotiated away at decision making stage on relevant developments).

68. It is also important to note that the Table 3 appraisals include a 5.0% funding yield. If adjusted out to 5.25%, a sensitivity test in Table 4 below shows that this eradicates any prospective surplus to be directed either into the affordable OSFC sought via Policy H7 or CIL. Introducing either cost on this typology would therefore risk pushing this PBSA typology beyond the margin of viability.

Table 4: Headroom Analysis: Developer-led Off Campus PBSA Development – OSFC Headroom / Student Bedroom (Yield)

		Headroom
Typology	PBSA Beds	£ OSFC / Student Room
10b	100-bed	-2,477

Source: CBRE

69. On the weight of the above (and enclosed) evidence, CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL. The appraisal summary is provided within **Enclosure 4**.

Lack of Transparency

70. There is a lack of transparency in the CIL Viability Study that CBRE deems falls short of the requirements and expectations of PPG CIL (Paragraph: 019 Reference ID: 25-019-20190901), PPG Viability (Paragraph: 010

Reference ID: 10-010-20180724), the NPPF (para. 58), the RICS Guidance[7] and RICS Professional Standards[8], and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.

71. Specifically, only one example appraisal is provided for the PBSA typology (100-bed). This is inadequate and all appraisals for non-residential typologies (notably PBSA) should be issued.

[7] RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note
[8] RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition

Conclusions and Recommendations

73. The consortium cannot endorse or support CYC's proposed modifications to Policy H7: Off Campus Purpose Built Student Housing proposing introduction of an OSFC (at a rate of 2.5% affordable housing equivalent per student bedroom) towards traditional affordable housing secured from off campus PBSA development.

74. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

75. CYC's published evidence base underpinning the proposed modification introducing the OSFC is now out-of-date and can no longer be relied upon by CYC.

76. In the intervening period between the EX/CYC//107/2 – Appendix 1 Technical Note being produced and the CYC CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

77. The CIL Viability Study now supersedes the earlier EX/CYC//107/2 – Appendix 1 Technical Note and clearly demonstrates it there is no longer sufficient viability 'headroom' within the tested PBSA typologies to support this financial contribution.

78. CBRE has prepared additional up-to-date viability evidence within this representation. CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL.

79. PPG and RICS Guidance[9] requires that a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage.

80. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed requirement of Policy H7 is unsound and requires removal.**

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

Enclosures

Enclosure 1: Investment Yield Guides – Q1 2023

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond

BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

Did you know

In addition to valuing assets in the main property sectors and having award winning teams in the Healthcare, Student and Automotive sectors, Knight Frank also has expertise in :

- Waste and Energy
- Infrastructure
- Garden Centres
- Film Studios
- Serviced Offices
- Data Centres
- Life Sciences
- Income Strips
- Ground Rents
- Trading assets
- Expert Witness
- IPOs

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We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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JLL SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

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Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

Enclosure 2: RICS BCIS – Rebased to York (March 2023)

BCIS®

£/m2 study

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

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

Enclosure 3: Developer-led (Off-campus) PBSA Development Typology Appraisals (Excluding Modified Policy H7 OSFC)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			409,788	
				409,788
Stamp Duty			9,989	
Effective Stamp Duty Rate		2.44%		
Agent Fee		1.00%	4,098	
Legal Fee		0.80%	3,278	
				17,366
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				14,687,885
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			92,674	
Construction			1,487,163	
Total Finance Cost				1,579,837
TOTAL COSTS				**18,716,658**
PROFIT				
				3,743,332

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation					
Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000
NET REALISATION				**39,305,000**	
OUTLAY					
ACQUISITION COSTS					
Residualised Price			379,270		
				379,270	
Stamp Duty			8,463		
Effective Stamp Duty Rate		2.23%			
Agent Fee		1.00%	3,793		
Legal Fee		0.80%	3,034		
				15,290	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Student accommodation - 350 bed typology	99,975	221.90	22,184,452		
Externals		10.00%	2,218,445		
Site Abnormals	1 ac	400,000 /ac	304,000		
Contingency		4.00%	976,116		
				25,683,014	
Other Construction					
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500		
Policy G12 BNG	1 ac	15,000 /ac	11,400		
				798,900	
PROFESSIONAL FEES					
Professional Fees		8.00%	1,952,232		
				1,952,232	
DISPOSAL FEES					
Sales Agent Fee		2.00%	786,100		
				786,100	
FINANCE					
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)					
Land			99,231		
Construction			3,040,130		
Total Finance Cost				3,139,361	
TOTAL COSTS				**32,754,167**	
PROFIT					
				6,550,833	
Performance Measures					
Profit on Cost%		20.00%			
Profit on GDV%		16.67%			
Profit on NDV%		16.67%			
Development Yield% (on Rent)		6.00%			
Equivalent Yield% (Nominal)		5.00%			
Equivalent Yield% (True)		5.16%			

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(376,826)	
				(376,826)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				1,374,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(105,374)	
Construction			6,402,315	
Total Finance Cost				6,296,941
TOTAL COSTS				**56,149,993**
PROFIT				
				11,230,005

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 4: Developer-led (Off-campus) PBSA Development 100-bed Typology Appraisal (Excluding Modified Policy H7 OSFC) with Funding Yield at 5.25% (Sensitivity)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227

NET REALISATION **10,695,227**

OUTLAY

ACQUISITION COSTS				
Residualised Price			7,307	
				7,307
Agent Fee		1.00%	73	
Legal Fee		0.80%	58	
				132
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	213,905	
				213,905
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			1,302	
Construction			584,710	
Total Finance Cost				586,012
TOTAL COSTS				**8,912,689**
PROFIT				
				1,782,538

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

Based on rack rented properties and disregards bond type transactions

Click here to view previous data

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

Your partners in property.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

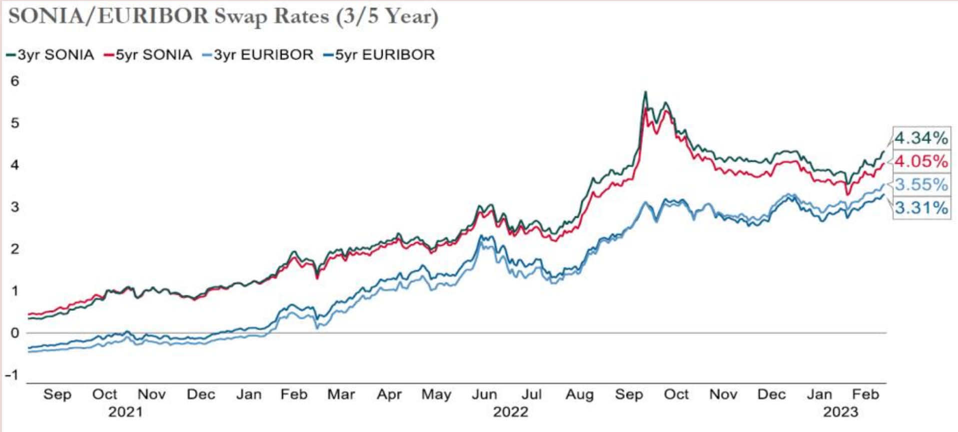
UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond



BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

Did you know

In addition to valuing assets in the main property sectors and having award winning teams in the Healthcare, Student and Automotive sectors, Knight Frank also has expertise in :

- Waste and Energy
- Infrastructure
- Garden Centres
- Film Studios
- Serviced Offices
- Data Centres
- Life Sciences
- Income Strips
- Ground Rents
- Trading assets
- Expert Witness
- IPOs

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We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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JLL SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

Contacts

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Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

BCIS®

£/m2 study

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

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation

Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			409,788	
				409,788
Stamp Duty			9,989	
Effective Stamp Duty Rate		2.44%		
Agent Fee		1.00%	4,098	
Legal Fee		0.80%	3,278	
				17,366
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				14,687,885
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			92,674	
Construction			1,487,163	
Total Finance Cost				1,579,837
TOTAL COSTS				**18,716,658**
PROFIT				
				3,743,332

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000

NET REALISATION				**39,305,000**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			379,270	
				379,270
Stamp Duty			8,463	
Effective Stamp Duty Rate		2.23%		
Agent Fee		1.00%	3,793	
Legal Fee		0.80%	3,034	
				15,290
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				25,683,014
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			99,231	
Construction			3,040,130	
Total Finance Cost				3,139,361
TOTAL COSTS				**32,754,167**
PROFIT				
				6,550,833

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(376,826)	
				(376,826)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				1,374,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(105,374)	
Construction			6,402,315	
Total Finance Cost				6,296,941
TOTAL COSTS				**56,149,993**
PROFIT				
				11,230,005

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY **CBRE**

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227
NET REALISATION				**10,695,227**	

OUTLAY

ACQUISITION COSTS				
Residualised Price			7,307	
				7,307
Agent Fee		1.00%	73	
Legal Fee		0.80%	58	
				132
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	213,905	
				213,905
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			1,302	
Construction			584,710	
Total Finance Cost				586,012
TOTAL COSTS				**8,912,689**
PROFIT				
				1,782,538

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #345

COMPLETE

Started:	Monday, March 27, 2023 4:35:52 PM
Last Modified:	Monday, March 27, 2023 4:40:32 PM
Time Spent:	00:04:40
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

SIGN UP FREE

Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.7 Policy SS3: York City Centre

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won’t work

Not consistent with national policy - i.e. doesn’t comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Class E does not include drinking establishments or hot food take-aways which have now been removed as city centre uses since the policy only references class E rather referring to Sui Generis - drinking establishments and Hot Food Take-Away, as well. This is an unjustified amendment which will inadvertently adversely affect the vitality and viability of the city centre and local businesses/ jobs which contrary to national policy and the draft economic strategy and the objectives of the emerging local plan This policy is not consistent with national policy. The policy is now inconsistent with the use class order and the definition of ‘development’ under s55 Town and Country Planning Act since retail uses are treated differently to other class E uses. Suggested amendment – revise the wording to refer to the current Use Class Order e.g. Class E, and appropriate sui generis uses i.e. drinking establishments, and hot food takeaways

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #346

COMPLETE

Started: Monday, March 27, 2023 4:40:33 PM
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IP Address: 188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

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Q6

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.8 Policy EC5 Explanation – paragraph 4.17

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link COPY 459 responses

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

MM4.8 is inconsistent with the revised wording of policy EC5. EC5 suggests temporary caravan sites will be permitted (subject to a specified criterion, and green belt policies) whereas supporting text states that "caravan sites are inconsistent with policy requirements to protect openness" MM4.8 introduces ambiguity and is inconsistent with national and emerging policy requirements to protect openness and green belt exceptions that are not inappropriate development. MM4.8 should not pre-judge an assessment of openness in relation to the green belt.

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #348

COMPLETE

Started:	Monday, March 27, 2023 4:41:45 PM
Last Modified:	Monday, March 27, 2023 4:42:40 PM
Time Spent:	00:00:55
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY 459 responses

Q6

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.9 Policy R1: Retail Hierarchy and Sequential Approach

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

The policy title should be amended to "Policy R1: Town Centre Uses Hierarchy to ensure consistency with the use class order, class E, and to avoid confusion The policy title should be amended to "Policy R3: York City Centre Uses" to ensure consistency with the use class order, class E, and to avoid confusion. The supporting text only references class E rather referring to Sui Generis - drinking establishments and hot food takeaways, as well. This is an unjustified amendment which will inadvertently adversely affect the vitality and viability of the city centre and local businesses/ jobs which contrary to national policy and the draft economic strategy and the objectives of the emerging local plan

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #349

COMPLETE

Started:	Monday, March 27, 2023 4:42:40 PM
Last Modified:	Monday, March 27, 2023 4:43:27 PM
Time Spent:	00:00:46
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

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Q6

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.11 Policy R3: York City Centre Retail

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

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Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won’t work

Not consistent with national policy - i.e. doesn’t comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

The policy title should be amended to “Policy R3: York City Centre Uses” to ensure consistency with the use class order, class E, and to avoid confusion. The supporting text only references class E rather referring to Sui Generis - drinking establishments and hot food takeaways, as well. This is an unjustified amendment which will inadvertently adversely affect the vitality and viability of the city centre and local businesses/ jobs which contrary to national policy and the draft economic strategy and the objectives of the emerging local plan

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #350

COMPLETE

Started:	Monday, March 27, 2023 4:43:27 PM
Last Modified:	Monday, March 27, 2023 4:45:43 PM
Time Spent:	00:02:15
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

SIGN UP FREE

Q6

To which section does this response relate?

Section 15: Delivery and Monitoring

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

MM15.1 Policy DM1: Infrastructure and Developer Contributions

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

All s106 payments are subject to viability and this should be explicit in D1 supporting text to ensure consistency with national policy. Suggested wording "developer contributions and CIL will be directed towards primary and secondary healthcare, open space in line with the Infrastructure Delivery Plan in accordance with the tests set out in the CIL regulations The cumulative impact of the modifications/ policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and as such it is unlikely to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Contrary to paragraph 173 and 174 NPPF (2012) viability has not been properly considered with regards to cumulative impact

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #351

COMPLETE

Started:	Monday, March 27, 2023 4:45:43 PM
Last Modified:	Monday, March 27, 2023 4:46:28 PM
Time Spent:	00:00:45
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

SIGN UP FREE

Q6

To which section does this response relate?

Section 6: Health and Wellbeing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

MM6.10 Policy HW5: Healthcare services

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

All s106 payments are subject to viability and this should be explicit in D1 supporting text to ensure consistency with national policy. Suggested wording "developer contributions and CIL will be directed towards primary and secondary healthcare, open space in line with the Infrastructure Delivery Plan in accordance with the tests set out in the CIL regulations The cumulative impact of the modifications/ policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and as such it is unlikely to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Contrary to paragraph 173 and 174 NPPF (2012) viability has not been properly considered with regards to cumulative impact

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #353

INCOMPLETE

Started:	Monday, March 27, 2023 4:46:28 PM
Last Modified:	Monday, March 27, 2023 4:47:06 PM
Time Spent:	00:00:37
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neil Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO30 4GR
Email address	enquires@oneill-associates.co.uk

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

SIGN UP FREE

Q6

To which section does this response relate?

Section 9: Green Infrastructure

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

MM9.10 Policy GI6: New Open Space provision

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

All s106 payments are subject to viability and this should be explicit in D1 supporting text to ensure consistency with national policy. Suggested wording "developer contributions and CIL will be directed towards primary and secondary healthcare, open space in line with the Infrastructure Delivery Plan in accordance with the tests set out in the CIL regulations The cumulative impact of the modifications/ policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and as such it is unlikely to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Contrary to paragraph 173 and 174 NPPF (2012) viability has not been properly considered with regards to cumulative impact

SIGN UP FREE

City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #361

COMPLETE

Started: Monday, March 27, 2023 4:57:36 PM
Last Modified: Monday, March 27, 2023 5:02:11 PM
Time Spent: 00:04:35
IP Address: 188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

O'Neill Associates

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link,
City/town	York
Post code	YO30 4GR
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

SIGN UP FREE

Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.17 Policy H7: Student Housing

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Please see attached document

City of York Local Plan Modifications Consultation 27 March 2023

Response on behalf of York St. John University ref. 901 and University of York ref.849

Consolidated Main Modifications January 2023: Modification Refs. MM5.17 and MM5.18

Policy H7: Off Campus Purpose Built Student Housing

These representations are made on behalf of York St John University and The University of York in response to the City of York Local Plan Modifications Consultation March 2023. They relate to modifications MM5.17 and MM5.18 of the Consolidated Main Modifications January 2023 and EX/CYC/107/3 Student Housing Policy H7 Note August 2022.

This statement has been prepared in direct collaboration with York St John University and the University of York and is approved by both. Their individual statements on which these representations are based are appended.

1.0 INTRODUCTION

1.1 Modification MM5.17 relates to ***Policy H7: Off Campus Purpose Built Student Housing.*** This requires each university to address the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to off campus provision and the capacity of independent providers of bespoke student housing in the city.

1.2 Modification MM5.18 relates to modification of the Explanation text in §5.47. EX/CYC/107/3 Student Housing Policy Note August 2022 provides the evidence base to justify the requirement for affordable housing contributions.

1.3 Student housing was discussed at the EIP at Phase 3 Matter 3 in July 2022. Since that discussion a significant number of modifications to policy H7 and explanatory text are proposed, particularly focusing the policy on off campus provision only.

1.4 Of significance to this consideration is the major change in the delivery of courses to be provided by the University of York from September. This includes introduction of modular degrees so that modules can be completed at differing rates to accumulate sufficient for a degree rather than over a sequential three year period; hybrid courses taught part online and part in person; and delivery moving to 2 semesters/year, aspects of which will significantly impact on the use of student housing, (see 2.2 below).

2.0 NEED FOR STUDENT HOUSING

2.1 Draft Policy H7 requires the city's universities to address the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to off campus provision and the capacity of independent providers of bespoke student housing in the city. Proposed Council modifications to the policy and explanation text are shown in yellow:

Policy H7: Proposals for off campus purpose-built student accommodation, other than the allocation at SH1, will be permitted where all of the following criteria are satisfied:

i. It can be demonstrated that there is a need for student housing which cannot be met on campus; and

Explanation
§5.47….applicants should present a proven need for student housing by providing an assessment of:

- Existing and likely future student numbers requiring accommodation taking account of students who study from home
- A review of the current level of provision, including level of vacancies and the quality of accommodation
- Likely future supply of accommodation based on extant planning permissions and estates strategies of the relevant provider

The assessment should form the basis of a formal agreement between the developer and an education provider, confirming the number of bedspaces and accommodation type required.

§5.48 Only full time students should be included in the analysis. Part-time students should be excluded based on the assumption that they are already housed for the duration of their part-time studies.

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

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

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

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

2.3 These changes fundamentally alter the way in which the need for student housing is assessed. The delivery of teaching of some modules partly online and partly in person will result in some registered students being taught at the university for short periods. Delivery of CPD programmes will also require short term accommodation.

Student housing therefore will need to be available flexibly 365 days of the year to provide for these other modes of delivery and new markets

Thus, calculation of need for student housing will become a more complicated process which the universities will be required to demonstrate, based on their various methods of education delivery.

Revised wording for the final bullet in §5.47 is proposed as:

- *Methods of education delivery, likely future supply of accommodation based on extant planning permissions, residential accommodation strategies and estates strategies of the relevant provider*

2.4 Text in §5.48 stating that only full time students should be included in the analysis of need has become inappropriate. Students may attend for a single semester or may be taking part-time courses as part of their employment but may not live locally and will require affordable student housing.

Text in §5.48 should be deleted:

~~§5.48 Only full time students should be included in the analysis.~~

3.0 SECURING HOUSING FOR YORK STUDENTS

3.1 The modified policy text states that:

iia. The rooms in the development are secured through a nomination agreement for occupation by students of one or more of the University of York and York St John University

3.2 It is noted that the modified wording of local plan policy H7 alters the basis for establishing need for PBSA developments and securing the provision. To date, the test is to establish a shortfall in provision compared with current demand, with developers shouldering the financial risk. The modified wording shifts the focus to accommodating predicted need based on increasing student numbers at either or both universities.

3.3 The universities are intended to commit to nomination agreements with developers at the planning application stage, three years ahead of any occupation date. By imposing nomination agreements, the financial risk is transferred from the developer to the university.

3.4 Nomination agreements are not considered by the city's universities as a suitable method to secure the required specifications and financial terms for future off campus student housing schemes for a number of reasons including the fact that, once a nomination agreement has expired, there is no restriction on a rent hike being imposed. In any event, the University of York is not able to enter into nomination agreements or long leases due to existing legal restrictions from legacy contractual arrangements.

3.5 The University of York does not consider that the University should be compelled by planning policy to take all the risk of PBSA provision which has rested with developers to date. The University will support a scheme for PBSA where:

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

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

3.6 Both universities consider that contracts on agreed terms will exercise more control on specification and rents. This route would be secured by planning conditions and/or a Section 106 Agreement.

3.7 We therefore submit that the policy test should simply require that any PBSA planning applications should be supported by one or more of the HEIs accompanied by Five Year Student Number Forecast data and not specify how that support is to be demonstrated, to allow for flexibility.

3.8 Revised wording proposed:

iia. Development will be permitted where either university is able to demonstrate that there will be unmet need to coincide with the delivery of bedspaces.

4.0 OCCUPATION OF THE ACCOMMODATION

4.1 The modified policy text states that:

iv. The accommodation shall be occupied only by full-time students enrolled in courses of one academic year or more and conditions or obligations shall be imposed to secure compliance with this requirement and for the proper management of the properties

4.2 The education delivery strategy and organisation of the University of York is due to undergo its major reorganisation from the start of the next academic year 2023/24 is outlined in Section 2 above. Degree courses will be modular to allow concentrated or more extended completion of modules. Course delivery will include attendance in person by semester for some, or hybrid part online/part in person, or for short course or CPD programmes. Thus, the traditional model of all undergraduate students attending full-time for 32 weeks per year will be set aside and occupation of the student housing will be varied over the calendar year. Postgraduate students, whether taught or research, are already in occupation for the majority of the calendar year.

4.3 Therefore, the student housing must be available for university use on 365 days/year. This allows for use by attendees at short courses, such as medical practitioners attending practice updates at the Hull York Medical School, or student nurses, others attending CPD courses, visiting staff attending for a short duration or conference delegates. Policy ED1 already allows for these activities on campus.

4.4 Running courses and conferences during vacations using student housing allows for a shorter lease for the age 18-22 cohort thus reducing the financial burden on these students.

4.5 On this basis, the text in iv. is no longer appropriate. Revised wording is proposed:

iv. The accommodation shall be occupied by students registered with a university in the city and actively pursuing their studies, those attending for conferencing, short courses, CPD or visiting staff. Conditions or obligations shall be imposed to secure compliance with this requirement and for the proper management of the properties.

5.0 CONTRIBUTIONS TOWARDS AFFORDABLE HOUSING IN THE CITY

5.1 The major introduction to policy H7 states that:

For new student accommodation a financial contribution should be secured towards delivering affordable housing elsewhere in the City. The contribution will be calculated on a pro rata basis per bedroom using the following formula…

Contributions towards affordable housing provision will not be sought where the student accommodation site which at the date of adoption of the Plan is owned by a university and which will continue to be owned or held by a university to meet the accommodation needs of its students

5.2 COST OF LIVING FOR STUDENTS

Students are being significantly affected by the rise in the cost of living as are households. A survey for the Russell Group Students' Union published in March 2023 pinpointed the problems experienced by students, (Report appended to this representation). In data taken from 8,800 responses the report found: -

- 94% of students are concerned about cost of living crisis
- 1 in 5 are considering dropping out
- 1 in 4 are regularly going without food and necessities

- Maintenance loans have been frozen. University leaders say Government forecasts have been inaccurate in each year since 2020-21 and with no mechanism in place to correct for inflation. This means "significant real-terms cut" has been baked into the system.

5.3 Those from lower income families are severely impacted.

> **The top four groups who reported having less than £100 in savings:**
>
> - **Students whose parents have no qualifications** (34%, N = 144/423)
> - **Students with a household income of less than £25,001/annum** (32%, N = 574/1801)
> - **Students with caring responsibilities** (29%, N = 140/480)
> - **International students** (29%, N = 501/1747)
>
> **Each of these groups were statistically more likely to have less than £100 in savings.**

5.4 Impacts of high cost of living are: -

- Likelihood of deferral of a course decreases as household income increases, however it is only for students from the highest income households (£75,000 or more per annum) that this drops below 15% thus becoming unaffordable for all but the most advantaged

- The parental threshold for maximum student finance support, which has been frozen since 2008 despite average earnings increasing significantly, needs to be reviewed

- Divisionary impacts exclude students from going to university and then for those who do go are excluded from socialising and high academic performance

This survey of more than 8,500 students, carried out in the first two months of this year, found that the proportion of students who were considering dropping out rose to more than 3 in 10 among the most socio-economically disadvantaged.

5.5 Office for Students:

Equality of opportunity is one of 11 goals for universities: -

- **'Students' access, success and progression are not limited by their background, location or characteristics.'**

This is a major obligation for universities in this country. Higher costs of student housing are clearly divisive, impacting students from lower income families to a greater extent, dissuading university applications, increasing the likelihood of students dropping out of their course or leading to students spending excessive time at jobs which then impacts on their ability to study.

6.0 VIABILITY

6.1 The proposed obligation for PBSA schemes to contribute to affordable housing currently equates to around £7k/bed. This obligation would necessarily have to be recouped from rental charges. Since rent is a significant proportion of expenditure for students, this would have a major impact on them, who are already struggling with the cost of living, (see attached Cost of Living report March 2023 Russell Group Students' Union.)

6.2 The viability exercise by the Council's advisors, Porter Planning Economics, concludes that the PBSA activity has adequate viability to make an affordable housing contribution. This is challenged in CBRE evidence on the grounds that the Council's evidence in EX/CYC/107/3 is superseded by their CIL evidence and therefore cannot be relied upon. The CBRE evidence is submitted with this planning representation which shows that there is no case for an affordable housing contribution from H7 accommodation.

6.3 **MM5.17 and MM5.18 are reliant on EX/CYC/107/3. However, this has been effectively superseded when the Council published its CIL viability study. Therefore EX/CYC/107/3 is out of date and cannot be relied upon. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound.**

6.4 Notwithstanding this point of principle, if there were any viability headroom from off-site purpose built student housing, this should be retained to contribute to the affordability of the student housing for which there is an identified need, as evidenced in the individual statements from HE institutions submitted with these representations. As discussed at the Examination in Public phase 3 matter 3, students are a component of the city's population and their housing provision needs to be adequately facilitated in the Local Plan, particularly in terms of affordable student housing. The plan is not positively prepared in this regard.

6.5 Policies ED1, ED2, ED3 and ED4 and ED5 and text support the continued success of the city's universities. Expensive student housing is evidenced to deter lower income students from participation in higher education, thus rendering the student body less inclusive, (see York St John University and the University of York statements.)

7.0 REMEDY

7.1 **Our clear position, based on detailed viability evidence submitted as part of these representations, is that the city's universities cannot support affordable housing contributions. MM5.17 is unsound and all references within policy H7 to affordable housing contributions should be removed.**

7.2 In this regard, revised wording to Policy H7 is proposed:

Policy H7: Off Campus Purpose Built Student Housing

The University of York and York St. John University must address the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to off campus provision and the capacity of independent providers of bespoke student housing in the city. To meet any projected shortfall, provision by the University of York can be made on either campus. Provision by York St. John University is expected to be off campus but in locations convenient to the main campus.

SH1: Land at Heworth Croft, as shown on the proposals Policies Map, is allocated for student housing for York St. John University students.

Proposals for off campus purpose built student accommodation, other than the allocation at SH1, will be permitted where all of the following criteria are satisfied:

i. *it can be demonstrated that there is a need for student housing which cannot be met on campus; and*

ii. *it is in an appropriate location for education institutions and accessible by sustainable transport modes;*

iia *~~The rooms in the development are secured through a nomination agreement for occupation by students of one or more of the University of York and York St. John University; and~~ Development will be permitted where a university in the city is able to demonstrate that there will be unmet need to coincide with the delivery of bedspaces*

iii. *the development would not be detrimental to the amenity of nearby residents and the design and access arrangements would have a minimal impact on the local area.*

iv. *~~The accommodation shall be occupied only by full-time students enrolled in courses of one academic year or more and conditions or obligations shall be imposed to secure compliance with this requirement and for the proper management of the properties.~~*
The accommodation shall be occupied by students registered with a university in the city and actively pursuing their studies, those attending for conferencing, short courses, CPD or visiting staff. Conditions or obligations shall be imposed to secure compliance with this requirement and for the proper management of the properties.

~~For new student accommodation a financial contribution, or should be secured towards delivering affordable student accommodation or affordable housing.~~

~~The affordable contribution will be calculated on a pro rata basis per bedroom using the following formula:~~

~~Average York Property price – Average York Fixed RP Price x 2.5% = OSFC per student bedroom~~

~~The contribution will be required only from the number of units creating a net gain. For mixed-use developments of student accommodation with general housing a pro-rata approach will be used to determine whether a contribution is required, and how much this should be. Contributions towards affordable housing provision from new student accommodation will not be sought where the student accommodation site which at the date of adoption of the Plan is owned by a university and which will continue to be owned by a university to meet the accommodation needs of its students.~~

~~Where a developer considers the contribution cannot be fully met they should justify the level of provision proposed through an open book appraisal to demonstrate to the Council's satisfaction that the development would not otherwise be viable.~~

~~Developers may not circumvent this policy by artificially subdividing sites, and are expected to make efficient use of land.~~

Explanation

5.47 *Whilst it is recognised that counting students can be difficult and student numbers can vary depending on what source or definition is used, applicants should present a proven need for student housing by providing an assessment of:*

- *Existing and likely future student numbers and numbers requiring accommodation taking into account the proportion of students who study from home*
- *A review of the current level of provision, including level of vacancies and the quality of accommodation*
- *Likely future supply of accommodation based on methods of education delivery, extant planning permissions and estates strategies of the relevant provider.*

The assessment should form the basis of a formal agreement between the developer and an education provider, confirming the number of bedspaces and accommodation type required.

5.48 *~~Only full-time students should be included in the analysis.~~ ~~Part-time students should be excluded based on the assumption that they are already housed for the duration of their part-time studies.~~*

Janet O'Neill

Director

Attached:

- City of York Local Plan Proposed Modifications Consultation February 2023 CBRE
- Statement by Mrs Harvey Dowdy Director of Technology, Estates and Facilities University of York March 2023
- Statement by Nick Coakley Director Estates Management and Development York St John University March 2023
- Cost of Living Report Russell Group Students' Union March 2023

(ref:ulp2303.mods reps.H7v8)

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

Harvey Dowdy Director of Technology, Estates and Facilities

1.0 Student Housing Provision in York

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

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

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

2.0 Major education reorganisation of delivery strategy at University of York

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

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

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

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

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

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

3.0 Socio-Economic background of University of York students

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

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

4.0 University Student Housing Costs

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

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

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

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

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

* Statistics taken from YSJU data

5.0 Support for students from University

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

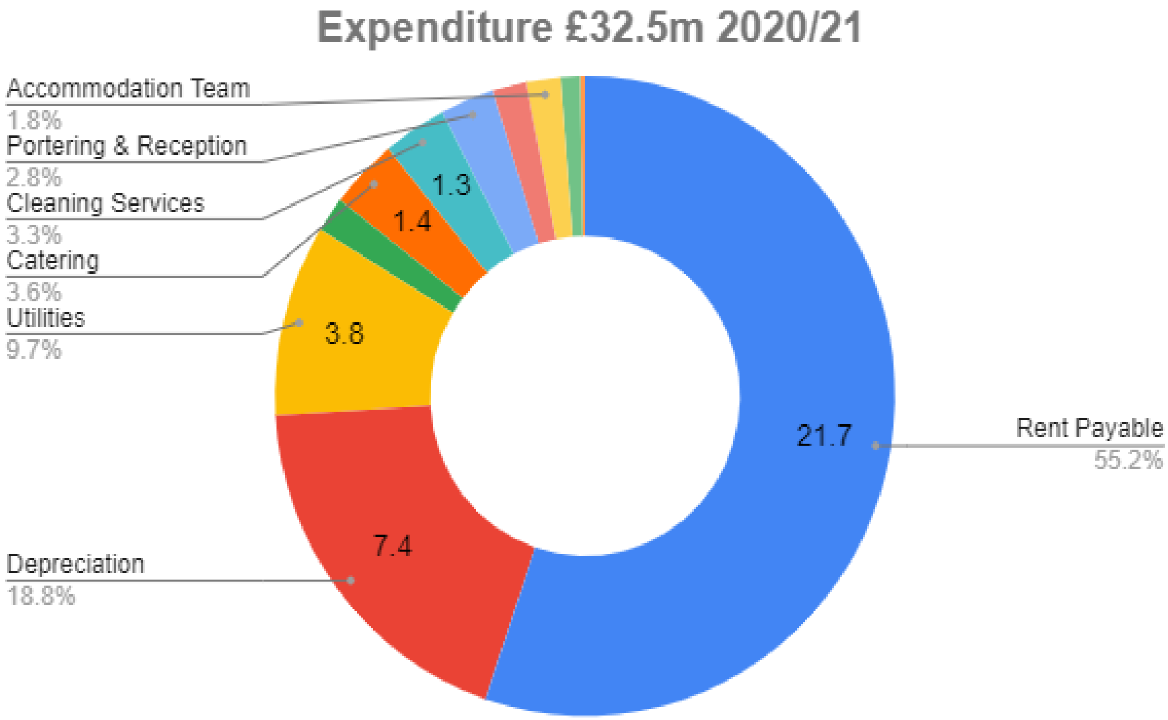
5.2 As the data below shows, the University is making a loss for on-campus accommodation in order to respond to these affordability problems, whilst the PBSA model is associated with profit driven rent prices. The proposed CIL charge of £150 per m^2 GIA levied on any new provision of on-campus accommodation,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

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

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

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

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



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

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

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

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

6.0 Securing the accommodation for university use

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

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

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

6.4 The University will support a scheme for PBSA where:

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

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

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

7.0 Occupation of the accommodation

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

York St John University

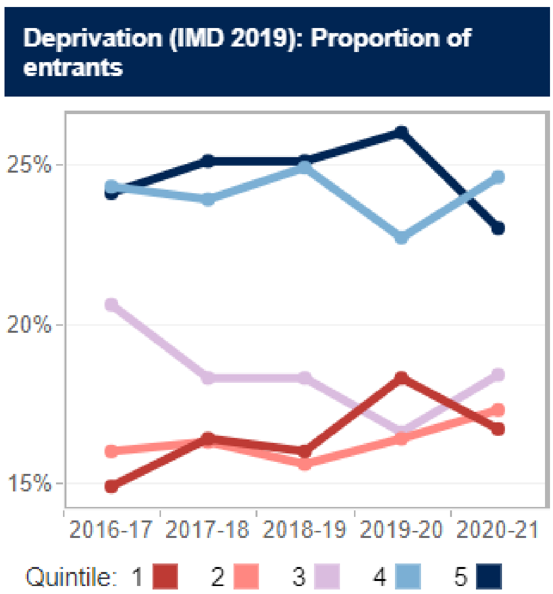
Comments on the University's Student Housing Affordability Regime in relation to the Emerging York Local Plan Modifications **22 March 2023**

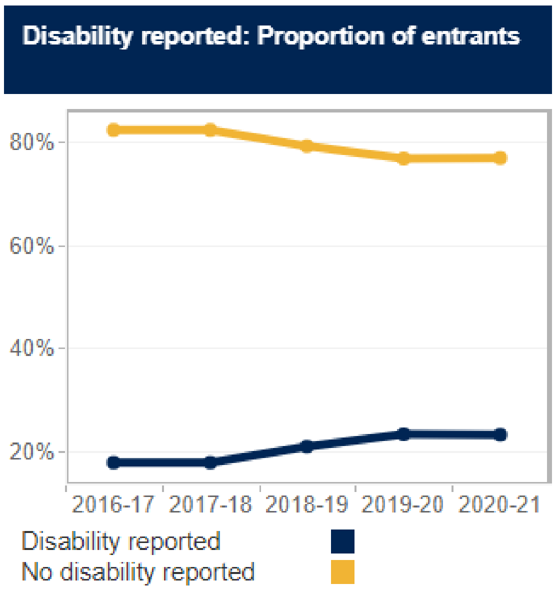
1. Overview

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

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

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





HEFCE Student access data 2021, York St John University

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

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

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

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

2. Student Profile

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

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

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

3. Student hardship and cost of living impacts

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

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

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

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

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

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

4. Proposed policy H7 and securing additional student housing

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

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

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

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

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

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

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

5. Community Infrastructure Levy or equivalent contributions

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

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

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

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

We ask that these concerns are taken into account to ensure that planning policy is genuinely supportive of the University's needs as a prime employer and integral part of the city's economy.

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(ref:Local plan NC revised policy H7 comments YSJ.v5)

CBRE

City of York Local Plan Proposed Modifications Consultation Feb 2023

Technical representation prepared by CBRE UK Ltd jointly on behalf of the following:

- University of York
- York St John University
- Askham Bryan College

March 2023

Contents

Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by a consortium of higher and further education institutions ('the consortium') to prepare a formal representation document setting out a technical response to the City of York Council ('CYC') Local Plan Proposed Modification Consultation February 2023 ('the Local Plan consultation').

2. CBRE's instruction relates specifically to CYC's proposed modifications to Policy H7: Off Campus Purpose Built Student Housing.

3. CBRE's technical representations focus upon the evidence base underpinning CYC's proposed modifications to Policy H7, namely:

   a. EX/CYC/107/2 - Affordable Housing Note August 2022: This document is titled the CYC Student Housing Policy H7 Note August 2022 ('the Policy H7 Note'). It is also accompanied by a technical note (as follows)

   b. EX/CYC//107/2 – Appendix 1: This document is titled the CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7, and is dated 22 August 2022 ('the Technical Note').

4. However, it is important for CYC to be aware that the Technical Note that underpins the Policy H7 Note has subsequently been superseded by the publication for consultation of the City of York CIL Viability Study Final Report ('CIL Viability Study'), also produced by Porter Planning Economics ('PPE') and dated December 2022.

5. The CIL Viability Study was published by CYC as part of the evidence base accompanying the Community Infrastructure Levy ('CIL') Draft Charging Schedule consultation, running to 27 March 2023.

6. As the CIL Viability Study supersedes the earlier Technical Note, CBRE is required to have due regard to both documents, and cross-references accordingly within this representation[1].

7. An overarching representation to the Local Plan consultation has been prepared by York-based town planning consultancy O'Neill Associates.

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[1] Note: CBRE has also made technical representations to the CYC CIL DCS consultation on behalf of the consortium. CBRE recommends that CYC reviews both sets of representations in parallel.

The Consortium

8. The consortium consists of the following leading higher education institutions ('HEI's') and a further education institution ('FEI'), all based within York:

   – University of York
   – York St John University
   – Askham Bryan College

The Consortium's Stance

9. The consortium has fundamental concerns regarding CYC's proposed modification to Policy H7 to introduce an off-site financial contributions ('OSFC') to traditional affordable housing secured from off campus PBSA development.

10. Specifically, the modification proposes the use of an adjusted version of the OSFC formula set out in Policy H7, which applies the number of student bedrooms. The rate of 2.5% affordable housing equivalent per student bedroom. Whilst the Technical Note applied an OSFC of £5,212 per student bedroom in testing the impact on financial viability, this has subsequently been uplifted to £7,000 per student bedroom as applied within the CIL Viability Study, and represents the latest OSFC sum.

11. It is the consortium's firm view that the introduction of the proposed OSFC to off campus PBSA development 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.

12. In light of above the consortium does not accept the validity and reliability of the published viability evidence base upon which the proposed PBSA OSFC relies.

13. In parallel, the consortium reports that the student body in York is suffering from the existing severe cost of living pressures. Each member of the consortium has reported that hardship grant application have increased substantially in recent years and the value of hardship support also rising, with housing costs representing the majority of funds required.

14. The consortium firmly believe 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 charged to students. The consortium would secure discounted units either via nomination agreements or lease agreements directly with developers / operators. This could be controlled either by condition or legal agreement.

15. Instead, the only way to absorb additional costs arising from the proposed OSFC would be to commensurately and significantly increase student rents, which would undermine the consortium's objectives of social inclusion by intensifying the affordability challenges already faced. This approach would be wholly contrary to the CYC's policy ambitions to increase the supply of affordable living accommodation in York.

Matters of Representation

Purpose

17. This section of the document sets out the matters of representation that the consortium determine must be raised with CYC.

Significance of Proposed OSFC

18. The OSFC proposed for off campus PBSA development represents a significant additional cost to development of this typology, at circa £7,000/student bedroom.

19. In addition, CYC has also consulted on a CIL DCS, which proposes to add a further charge of £50/m^2 to off campus PBSA developments delivering 100 student bedrooms or fewer. This means development of this scale will incur both the OSFC and CIL liability.

20. These are not incremental changes, but rather represent a fundamental shift to introduce substantial costs on development

Illogical Timing

21. The UK property market is experiencing a highly challenging period, which has been driven by substantial economic and geo-political uncertainty nationally and globally over 2022 and which is expected to prevail over the course of 2023. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. Development and investment across a wide range of sectors are facing headwinds, which commenced in mid-2022 and continue to prevail during 2023.

22. Specifically:

    a. Economic output and outlook has deteriorated as the inflationary squeeze on real incomes weighed on consumer confidence and spending that hit growth momentum. Throughout 2023, CBRE expect unemployment to rise from its current historically low level. In tandem, job vacancies will decrease. Wage growth will not be able to keep up with inflation until late 2023, eroding consumer purchasing power. We expect a moderate recession to occur in 2023, with GDP falling by 0.9%.

    b. Inflation has been rising relentlessly over the past 18 months and is at its highest for 40 years. Inflation has been driven by a post-COVID surge in demand, which could not be met due to supply bottlenecks. Russia's war in Ukraine has exacerbated supply shortages, pushing energy, food, and other commodity prices even higher. Policy choices, such as China's zero-COVID policy, are slowing down the recovery of supply chains, and raising the costs of imported durable goods. In the UK, inflation has been exacerbated by a weak pound, which has made imports more expensive to the UK consumer.

    c. Increased global supply chain disruption has and will continue to put further upward pressure on energy prices, food prices and construction materials. Significant uncertainty persists around the future path of inflation. Inflation remains stubbornly high in early 2023, with the Consumer Prices Index (CPI) rising by 10.4% in the 12 months to February 2023, up from 10.1% in January. CBRE's base case is that CPI inflation will have peaked in Q4 2022 and fall back in the second half of 2023. Implicit in this forecast is the end of the Ukraine conflict by year end with energy - and non-energy commodity prices falling from their current highs.

d. Monetary tightening is well underway over fears of second-round effects from wage and price-setting. During 2023, the Bank of England will continue to rise interest rates, which CBRE forecast to peak at around 4.5% and push borrowing costs to the highest levels prior to the financial crisis in 2008. As inflation begins to cool, rates will begin to decrease, declining gradually to a 'new normal' of around 2% from 2026 onwards.

e. Faced with spiraling prices and higher interest rates on loans, businesses and consumers are limiting spending. Consumer confidence has been hit, and retail sales will continue to decline until inflation moderates and consumers restore their purchasing power. Businesses will have to cut costs to preserve margins in a high-inflation environment. This will lead to some job losses and higher unemployment in the first half of 2023.

f. The 10-year gilt yield has risen by almost 200bps since the beginning of 2022 and financial conditions are materially tighter than in Q2 2022. The expectation of future short-term interest rate hikes will continue to push upward on long-term market interest rates until the base rate starts to move down.

g. Inflation and rising interest rates have resulted in an increase in property yields. This ongoing yield shift, which commenced from Q3 2022 has hit values and returns for investors. As the cost of capital, closely related to the interest rates of central banks and therefore to inflation, have risen, valuations have been negatively impacted.

23. Specifically considering the PBSA sector, CBRE's baseline forecast for 2023 is as follows:

a. Overall, the sector continues to be undersupplied but this is highly nuanced, and an understanding of affordability is key. An in-depth understanding of the submarket dynamics is critical.

b. Investment yields have softened in H2 2022 and high inflation and rising interest rates will continue to impact the investment and funding market over 2023 and into 2024, until inflation abates and central banks pivot on interest rates.

c. Overall, the development of new PBSA is slowing due to a combination of factors, and this will carry forward throughout 2023. Specifically, the drivers are as follows:

i. Rising build costs present viability challenges

ii. The pace of the planning system remains a significant barrier to delivery

iii. Rising operational costs will also continue to hinder new development given the negative impact on net rental income.

iv. Development financing is also increasingly expensive and is increasingly difficult to obtain.

24. CBRE questions the logic and rationale, and efficiency in use of public funds, for introducing additional costs on PBSA development via an OSFC in addition to a CIL regime with high charges set on PBSA developments at this juncture, given the wider challenges facing development and uncertainty in both the macro-economy and property market.

25. CYC's proposals to increase the cost burden on development at this point will exacerbate uncertainty and slow or stall development and regeneration plans on major sites across the city for PBSA development.

Outdated Evidence

26. As referenced prior, the published evidence used to inform and underpin the introduction of the OSFC is as follows:

a. EX/CYC/107/2 - Affordable Housing Note August 2022: This document is titled the CYC Student Housing Policy H7 Note August 2022 ('the Policy H7 Note'). It is also accompanied by a technical note (as follows)

b. EX/CYC//107/2 – Appendix 1: This document is titled the CYC Local Plan Viability Technical Note on Changes to Student Accommodation Policy H7, and is dated 22 August 2022 ('the Technical Note').

27. However, this evidence is now outdated and has been superseded by the CIL Viability Study produced by PPE and dated December 2022.

28. This presents viability testing of the off campus PBSA typologies that arrives at fundamentally different results to the EX/CYC//107/2 – Appendix 1 Technical Note.

29. Consequently, CYC should no longer be relying upon EX/CYC//107/2, as it represents a flawed evidence base given that property market conditions have shifted significantly since its publication and it has been superseded by other evidence published by CYC.

30. Given this, CBRE focuses analysis on the more recent evidence on the financial viability of PBSA typologies in respect of both the proposed OSFC and CIL charging, as set out within the CIL Viability Study.

31. This said, CBRE also considers that the CIL Viability Study itself is outdated and misrepresentative of current market conditions.

32. CBRE has reviewed the CIL Viability Study in detail. It is apparent that the input assumptions for PBSA scheme typologies, which are subsequently utilised by PPE in undertaking the viability modelling, analysis, conclusions and recommendations rely substantially upon evidence from Q1-2 2022.

33. As set out above, and well-documented, have been significant macro-economic headwinds and property market adjustment issues over the period since, as well as substantive ongoing construction cost inflation, which are material considerations that any robust viability evidence base must account for.

34. In addition, the Government is conducting a staged implementation of the Building Safety Act 2022, and has stated that it expects student accommodation to be subject to the regulatory regime under Part Three, which will have implications for the design and construction of new developments.

35. The Government has also recently consulted upon amendments to Approved Document B, which proposes that all new buildings of 30m (circa 10 storeys) or above will require a second separated staircase[2]. The Greater London Authority ('GLA') has pre-empted the Government's conclusions by mandating this requirement for new development in Greater London with immediate effect.

36. The Government is currently considering responses following closure of the consultation on 17 March 2023, but it is widely anticipated that student accommodation will be required to conform to the amendments, which is prompting developers and investors to factor second staircases into plans for new development going

[2] https://www.gov.uk/government/consultations/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings

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."

37. 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."

38. 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).
39. It does not appear that the CIL Viability Study has accounted for the this or addressed the implications and it certainly has not been referenced in the earlier EX/CYC//107/2 – Appendix 1 Technical Note.
40. CBRE has provided further details upon this relating to PBSA use within the 'Technical Deficiencies' sub-section of this representation.

Technical Deficiencies

41. As stated, due to the EX/CYC//107/2 – Appendix 1 Technical Note now being outdated and superseded, CBRE focuses analysis on the more recent evidence on the financial viability of PBSA typologies in respect of both the proposed OSFC and CIL charging, as set out within the CIL Viability Study.
42. This is possible given that the CIL Viability Study accounts for the proposed OSFC within viability modelling, and also tests the viability of the PBSA typologies both with (primarily) and without the proposed OSFC in order to demonstrate the implications.
43. There are a range of detailed technical issues identified, which render the CIL Viability Study as an inadequate basis for CYC utilizing to underpin justification for the OSFC (in addition to CIL charging):

    a. **Rents, Yields and Capital Values for PBSA Typologies:**

        i. CBRE noes not disagree with the CIL Viability Study's usage of the average gross rental income of £177/week to be applied to private sector off campus development typologies for the 2022/23 academic year.

        ii. OPEX is deducted at 30% of gross annual rent to generate a net rental income, which is capitalized at an investment yield of 5.0%. This is stated as generating a capital value of £112,300 per room.

        iii. The CIL Viability Study cites, at para 3.75 that the above capital value is a "*cautious sales value for the sole purpose of this planning viability assessment*".

iv. CBRE notes that this observation is based on evidence obtained from a Cushman & Wakefield report (non-York specific) drawing on data from H1 2022. It therefore does not represent current market conditions.

v. Analysing York specifically, there are relatively few recent transactions for which information is available. These are as follows and demonstrate a tone of circa 5.5%-6.5% NIY and capital value of circa £90,000-£100,000 per bed:

1. 62 Layerthorpe: comprising 98 beds transacted in 2019 on a forward fund / commit to iQ Student Accommodation for a total capital value of £92,000 per bed.

2. Haxby Road City Residential: comprising 124 beds transacted in 2018 on a stabilized investment basis at a NIY of 6.5%, reflecting £60,000 per bed.

3. Foss Studios: comprising 220 beds transacted in 2017 on a stabilized investment basis at a NIY of 5.7%, reflecting £106,000 per bed.

vi. The above capital values would suggest that the sum of £112,300 per room adopted in the CIL Viability Study actually exceeds transactional evidence available for York in recent years.

vii. 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.

viii. On the basis of the above, CBRE ranks York as a Prime Regional location for PBSA and understand that other agents such as JLL and Knight Frank regard the city on an equivalent basis.

ix. As stated earlier in this document, investment yields have softened since Q3 2022 due to wider macro-economic conditions, and continue to trend weaker in a high interest environment. The latest available investment yield sheets now record Prime Regional PBSA yields as follows:

1. JLL Monthly Yield Sheet: PBSA Prime Regional at 5.25% in January 2023 (softening from 5.0% in Q3-4 2022[3].

2. Knight Frank Prime Yield Guide – March 2023: PBSA Prime Regional at 5.0% - 5.25% (softening from 4.75%-5% in Q3 2022)[4].

3. CBRE UK Living Sectors Investment Yields – March 2023: PBSA Prime Regional at 5.0% and trending weaker (softening from 4.75% in Q3 2022)[5].

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[3] Note: this is provided within **Enclosure 1**.
[4] Note: this is provided within **Enclosure 1**.
[5] Note: this is provided within **Enclosure 1**.

x. In summary, three respected agents all report PBSA Prime Regional yields softening to 5.0% - 5.25% at present day. Importantly, these are not development funding yields, but are stabilized investment yields.

xi. Institutional forward funding has been one of the main delivery routes for financing the development of PBSA schemes in York and elsewhere across the regions, where brought forward by the private sector (i.e. non-University). CBRE's market intelligence is that funding yields are transacting at a discount of circa 25bps in comparison to stabilized investment yields. As a result, if the rates above are adjusted for development funding, this would see yields at 5.25% - 5.5%.

b. **Construction costs**:

i. The construction costs adopted are set out in Table 5.3 on p.49 are cited as being drawn from RICS BCIS. The source data is referenced as being provided in Appendix D. The RICS BCIS cost is cited as £2,112/m^2 (£196/ft^2) and base-dated at Q3 (i.e. Jul.-Sept.) 2022.

ii. Given that circa 6 months has passed since the construction costs were base dated, CBRE has reviewed the RICS BCIS data as published at 11 March 2023. On an equivalent basis the RICS BCIS median cost now stands at £2,166/m^2 (£201/ft^2), which is an increase of 2.6%. The data is provided within **Enclosure 2**.

iii. CBRE comment that the RICS BCIS costs of £2,166/m^2 (£201/ft^2) are extremely low in the context of PBSA developments being brought forward for delivery in regional cities in the current market, and would highlight that RICS BCIS is a significantly lagging indicator due to the time taken for tender data be provided and reporting updated. Hence, in an inflationary environment over 2022 and 2023, it has consistently underestimated construction costs being generated in real-time. Moreover, as mentioned prior, RICS BCIS will not yet account for changes to fire safety guidance (Approved Document Part B).

iv. CBRE notes that the CIL Viability Study also cites in para. 5.10 that additional allowance of 15% of build costs for external site works such as utilities, car parking and landscaping is provided.

v. However, reviewing the example 100-bed typology appraisal in Appendix A confirms that there is an error, whereby the viability appraisals only account for a 10% external works cost, which means that there is an omission in the viability testing of this typology of at least £280,262.50. This is greater than the entirety of the CIL headroom of £223,666, which would significantly alter the conclusions and recommendations of the CIL Viability Study. In essence, if corrected, it would eradicate any headroom at all for CIL on Typology 10a or 10b alongside the proposed OSFC, and CIL would require reducing to NIL for these typologies. As a result, the charging rate of £50/m^2 proposed within the CIL DCS for "*Purpose Built Student Housing with 100 or fewer student bedrooms and an affordable housing contribution*" would be required to be removed altogether via modification.

vi. In a further apparent error, the 100-bed typology appraisal in Appendix A contains only 8% professional fees, as a cost allowance. However, para. 5.10 states clearly that modelling allows for " *10% of build costs and externals for professional fees associated with the build, including architect fees, planner fees, surveyor fees, and project manager fees*". This means a further cost omission within the viability testing of the PBSA typologies, which will further reduce the viability of this use if reintroduced to the viability appraisals for each PBSA typology.

vii. CBRE has set aside the above points, pending clarification from CYC.

viii. Taking a stand back approach, CBRE's cross-section of market intelligence in the sector is that the current minimum construction cost for developer-led mid-specification PBSA schemes in the regions, equates to circa £85,000 per bed. It is CBRE's direct experience that higher specification schemes, which seek to secure higher rents from students (and which primarily target the international student market) are incurring far higher costs.

ix. In **Table 2** overleaf, CBRE has set out both a comparison between the RICS BCIS median rate costs as at Q3 2022 and March 2023. CBRE considers these costs to be more likely representative of construction to a low-mid specification product, which would achieve a lower than average rental price point in the York market. As the definition in RICS BCIS states it would therefore be more appropriate to reflect student halls of residences (i.e. university-led on campus development), rather than the higher specification product being delivered off-campus by private developers, and those which can secure rents at an average for York (i.e. the £177/week) or above.

x. CBRE notes that the RICS BCIS upper quartile rate (£2,389/m^2 | £222/ft^2) generates a construction cost, when allowing for external works, that is commensurate with the level of costs being seen for mid-market specification PBSA schemes in the regions (at circa £84,500/bed). This is provided for comparison in **Table 2**.

xi. For the reasons set out above, CBRE strongly advocates that the RICS BCIS upper quartile rate should represent the base construction cost for viability testing developer-led (i.e. off campus) PBSA typologies. The median rate simply isn't a realistic cost benchmark to adopt for this purpose in the current market.

Table 2: Comparison Analysis: RICS BCIS Costs Q3 2022 vs. Q1 2023 vs. Minimum Market Rates (CBRE Q1 2023)

RICS BCIS Median Q3 2022			Build			External Works @ 10%		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,112	196	19,288	40,736,256	600	67,894	4,073,626	6,789	44,809,882	74,683	2,323	216
2,112	196	11,251	23,762,112	350	67,892	2,376,211	6,789	26,138,323	74,681	2,323	216
2,112	196	6,429	13,578,048	200	67,890	1,357,805	6,789	14,935,853	74,679	2,323	216
2,112	196	3,215	6,790,080	100	67,901	679,008	6,790	7,469,088	74,691	2,323	216

RICS BCIS Median Q1 2023			Build			External Works @ 10%		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,166	201.2	19,288	41,777,808	600	69,630	4,177,781	6,963	45,955,589	76,593	2,383	221
2,166	201.2	11,251	24,369,666	350	69,628	2,436,967	6,963	26,806,633	76,590	2,383	221
2,166	201.2	6,429	13,925,214	200	69,626	1,392,521	6,963	15,317,735	76,589	2,383	221
2,166	201.2	3,215	6,963,690	100	69,637	696,369	6,964	7,660,059	76,601	2,383	221

RICS BCIS Upper Quartile Q1 2023			Build			External Works @ 10%		Total Costs (Build + Externals)			
£/m2	£/ft2	GIA (m2)	Cost (£)	Beds (Typologies)	£/Bed	Cost (£)	£/Bed	Cost (£)	£/Bed	£/m2	£/ft2
2,389	221.9	19,288	46,079,032	600	76,798	4,607,903	7,680	50,686,935	84,478	2,628	244
2,389	221.9	11,251	26,878,639	350	76,796	2,687,864	7,680	29,566,503	84,476	2,628	244
2,389	221.9	6,429	15,358,881	200	76,794	1,535,888	7,679	16,894,769	84,474	2,628	244
2,389	221.9	3,215	7,680,635	100	76,806	768,064	7,681	8,448,699	84,487	2,628	244

Source: RICS BCIS / CBRE Data

c. **Site Areas for Typologies**: It is not clearly stated within the CIL Viability Study as to how the site areas applied for each typology were derived and the evidence used to inform this. Given this is an important basis for setting benchmark land values, CBRE requests that this information is provided by CYC to provided transparency and clarity to stakeholders.

d. **Benchmark Land Value**:

i. The CIL Viability Study includes the adopted BLVs for non-residential uses within Table 5.6 on p.52. However, the document contains no supporting justification or evidence to underwrite the proposed BLVs, which CBRE considers a significant omission.

ii. The CIL Viability Study proposes a BLV of £1.5m/ha (£607,000/acre) as the BLV to apply to PBSA typologies.

iii. In order to find justification for this BLV, CBRE has had regard to the earlier EX/CYC//107/2 – Appendix 1 Technical Note. An explanation is provided in paras 20-23.

iv. 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 EX/CYC//107/2 – Appendix 1 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.

v. CBRE is not aware of any abandoned, unviable or dilapidated industrial premises that could be redeveloped for PBSA use. There is presently a limited supply of sites suitable for redevelopment for PBSA uses across the city, which necessitates PBSA development competing with other forms of prospective development including hotels, traditional residential, elderly persons accommodation or offices.

vi. CBRE is therefore unclear on the logic behind Table 5.6 in the CIL Viability Study, on p.52. This is replicated below. It sets a substantially lower BLV for PBSA development in comparison to competing uses such as Hotel and Care Home uses (both £2m/ha), supermarket use (£2m/ha) and retail warehouse use (£2m/ha).

Table 5.6 Benchmark land values for non-residential existing uses

Typology	BLV per gross area
1: Town centre office	£1,500,000
2: Business park	£1,000,000
3: Industrial / warehouse	£850,000
4: Small local convenience	£2,000,000
5: Supermarket	£2,000,000
7: Retail warehouse	£2,000,000
8: City Centre retail	£4,000,000
9: Hotel (60 beds)	£2,000,000
10: Student accommodation	£1,500,000
11. Care home (60 bed)	£2,000,000

vii. In addition, CBRE also notes that the CIL Viability Study adopts a BLV for residential typology viability testing of £1.7m/ha for brownfield land in its existing use as 'City centre / extension' land within Table 4.15 on p.47.

viii. The CIL Viability Study does not adequately justify why competing brownfield land uses have been viability tested against a higher BLV and PBSA against a lower BLV. This warrants further explanation by CYC.

ix. 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.

x. A rational approach would be for BLVs for this use to be considered by way of market transactional analysis of sites brought forward for PBSA use within the city of York in recent years. CBRE recommends that CYC seek to source and consider such evidence in taking a 'stand back' approach and a York-specific market sense-check.

Results & Re-appraisal

44. The CIL Viability Study sets out the results of viability modelling within Table 7.1 on p.61. This is replicated below for ease.

Table 7.1 Recommended non-residential psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of		
		50%	33%	25%
1: Town centre office	-£1,034			
2: Business park	-£906			
3: Industrial / warehouse	-£333			
4: Small local convenience	£154	£77	£103	£115
5: Supermarket	-£117			
7: Retail warehouse	£134	£67	£90	£101
8: City Centre retail	-£68			
9: Hotel (60 beds)	-£143			
10a: Student accommodation - 25 bed	£127	£64	£85	£95
10b: Student accommodation - 100 bed	£84	£42	£56	£63
10c: Student accommodation – 200 bed	-£16			
10d: Student accommodation - 350 bed	-£50			
10e: Student accommodation - 600 bed	-£152			
11. Care home (60 bed)	-£937			

45. Whilst the CIL Viability Study only appends a summary viability appraisal for PBSA typology 10b, Table 7.1 clearly demonstrates PPE's headroom analysis concludes that only PBSA typologies 10a and 10b can viably accommodate both any CIL and a 2.5% affordable housing equivalent OSFC contribution per student bedroom.

46. This is notwithstanding CBRE and the consortium's representations that the conclusions within Table 7.1 and the CIL Viability Study are they themselves outdated and don't reflect deterioration in market conditions since Q3/4 2022.

47. With this in mind, Table 7.1 of the CIL Viability Study shows PBSA typologies 10c – 10e to all fall below the threshold of financial viability. This means they cannot accommodate any CIL, as there is no headroom, but critically these PBSA typologies are also demonstrated as generating negative headroom (shown in red) before charging of any CIL.

48. The off campus PBSA typologies already incorporate the OSFC cost of £7,000 per student bedroom. This means that the CIL Viability Study now determines that these off campus PBSA typologies are now unable to partially or fully meet the proposed OSFC costs of Policy H7 whilst remaining financially viable – as they generate negative headroom **before** incurring CIL.

49. It is no longer possible to discern from CYC's published evidence base where the threshold for viability actually sits in relation to the propensity of these PBSA typologies to be able to accommodate any OSFC costs.

50. This evidence in the CIL Viability Study directly contradicts the Table 6 results in the earlier published EX/CYC//107/2 – Appendix 1 Technical Note. This is replicated below for ease.

Table 6 PBSA scheme viability test at CYC Local Plan full policy and different OSFC rates

Scheme type	Land type	Viability and headroom			
		0% OSFC per student room (0% per Cluster unit)	2.5% OSFC per student room (10% per Cluster unit)	5% OSFC per student room (20% per Cluster unit)	10% OSFC per student room (40% per Cluster unit)
25-bed PBSA	Brownfield	£16,025	£10,276	£4,455	-£7,662
100-bed PBSA	Brownfield	£11,884	£6,151	£417	-£11,732
200-bed PBSA - low density	Brownfield	£11,095	£5,379	-£336	-£12,385
350-bed PBSA	Brownfield	£11,088	£5,386	-£316	-£12,326
600-bed PBSA	Brownfield	£8,794	£3,111	-£2,572	-£14,627

51. In summary, the CIL Viability Study now supersedes the earlier EX/CYC//107/2 – Appendix 1 Technical Note and clearly demonstrates it is out-of-date and can no longer be relied upon by CYC.

52. In the intervening period between the EX/CYC//107/2 – Appendix 1 Technical Note being produced and the CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

53. Consequently, based on the CIL Viability Study results, there is no longer any evidenced justification for CYC seeking for off-campus PBSA schemes to provide a 2.5% affordable housing equivalent OSFC contribution per student room (particularly in 200+ bed PBSA typologies), as there is no longer sufficient 'headroom' demonstrable within the tested PBSA typologies to support this financial contribution.

54. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

55. Further elaboration is provided in PPG Viability (para. 002 ref: 10-002-20190509):

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

56. As clearly set out in both PPG and the RICS Guidance[6], the impact on viability of a CIL, whether proposed or existing, should be considered alongside the full policy requirements of the Plan – this should therefore include the demonstrable viability of PBSA typologies (off-campus) to provide a 2.5% affordable housing equivalent OSFC contribution per student room.

57. In simple terms, a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for, and taking precedence over, the introduction of CIL rate setting. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage. PPG Viability is explicit on this point, stating the following in para. 002 ref: 10-002-20190509:

"Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."

58. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed required of Policy H7 is unsound and requires removal.**

59. Noting this issue, the CIL Viability Study also runs viability testing on PBSA typologies, specifically with the cost of meeting the 2.5% affordable housing equivalent OSFC contribution per student room **removed**, to determine CIL headroom to apply to on-campus PBSA. This is replicated in the following table.

Table 7.2 Recommended on campus student accommodation, psm CIL rates at different financial buffers

Typology	Headroom per CIL liable sqm	After buffer of 50%	33%	25%
10a: Student accommodation - 25 bed	£421	£211	£281	£316
10b: Student accommodation - 100 bed	£374	£187	£249	£281
10c: Student accommodation - 200 bed	£272	£136	£181	£204
10d: Student accommodation - 350 bed	£238	£119	£159	£179
10e: Student accommodation - 600 bed	£135	£68	£90	£101

60. CBRE cannot support the levels of CIL headroom being identified within Table 7.2 above for the PBSA typologies, for the reasons set out earlier within this representation.

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

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

61. Given CBRE's analysis set out above firmly highlights both technical issues with the CIL Viability Study evidence base and that market conditions have deteriorated since its publication, CBRE has run independent viability modelling on PBSA typologies to determine the implications for CIL headroom in the current market.

62. CBRE has utilised present-day input assumptions for off-campus (developer-led) PBSA development scheme typologies.

63. Firstly, CBRE has set the rental rates at £177/week to represent an average rate across the York market. OPEX is deducted at 30% of the gross annual rent to generate a net rental income. This is consistent with the CIL Viability Study inputs.

64. Secondly, CBRE has capitalised the net rental income at an investment yield of 5.0%. As set out earlier in this representation, most private-sector driven PBSA development has, and is expected to continue to be, institutionally funded. PBSA development funding yields are presently at circa 5.25% - 5.5% for prime regional locations, such as York. CBRE has taken the more optimistic stance of provisionally retaining the rate adopted in the CIL Viability Study, which represents a best case illustrative position as it would be unlikely to be achievable in today's market.

65. Thirdly, CBRE has increased the construction costs to reflect the RICS BCIS upper quartile cost as published at March 2023. This is deemed the most representative benchmark rate for current market construction costs for mid-market specification private-sector led PBSA schemes being brought forward in regional cities.

66. Fourthly, CBRE has not adjusted the external works and professional fees allowances utilised in the CIL Viability Study modelling – utilising the lower rates in the example appraisal appended to the document, rather than the higher figures referenced in the text. This therefore, again, adopts the most optimistic position absent of clarification from CYC.

67. Finally, CBRE has removed the proposed £7,000 OSFC per student bedroom from the viability modelling. The purpose therefore is to determine whether there is viability headroom to accommodate the OSFC contribution, and the level of surplus (headroom) per student room available (or deficit).

68. No CIL is allowed in addition, and is excluded.

69. For all other aspects, CBRE has attempted to mirror the approach in the CIL Viability Study modelling. As previously, this should not be taken as an endorsement, but is deemed reasonable and rational for the purposes of comparison – given it is not the responsibility of the consortium to prepare CYC's evidence.

70. The headroom analysis is provided overleaf. Appraisal summaries are provided within **Enclosure 3**.

Table 3: Headroom Analysis: Developer-led Off Campus PBSA Development – OSFC Headroom / Student Bedroom

Typology	PBSA Beds	Headroom £ OSFC / Student Room
10b	100-bed	1,084
10c	200-bed	-1,401
10d	350-bed	-2,174
10e	600-bed	-4,703

Source: CBRE

71. In summary, the analysis in Table 3 above reiterates that there is insufficient headroom for off-campus developer-led PBSA schemes to provide the affordable OSFC sought via Policy H7 (as modified). If combined with CIL liability as proposed for typologies 10a and 10b, then this would completely eradicate any headroom whatsoever (leading to the OSFC being immediately negotiated away at decision making stage on relevant developments).

72. It is also important to note that the Table 3 appraisals include a 5.0% funding yield. If adjusted out to 5.25%, a sensitivity test in Table 4 below shows that this eradicates any prospective surplus to be directed either into the affordable OSFC sought via Policy H7 or CIL. Introducing either cost on this typology would therefore risk pushing this PBSA typology beyond the margin of viability.

Table 4: Headroom Analysis: Developer-led Off Campus PBSA Development – OSFC Headroom / Student Bedroom (Yield)

Typology	PBSA Beds	Headroom £ OSFC / Student Room
10b	100-bed	-2,477

Source: CBRE

73. On the weight of the above (and enclosed) evidence, CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL. The appraisal summary is provided within **Enclosure 4**.

Lack of Transparency

74. There is a lack of transparency in the CIL Viability Study that CBRE deems falls short of the requirements and expectations of PPG CIL (Paragraph: 019 Reference ID: 25-019-20190901), PPG Viability (Paragraph: 010

Reference ID: 10-010-20180724), the NPPF (para. 58), the RICS Guidance[7] and RICS Professional Standards[8], and which does not facilitate the viability evidence being genuinely 'available' for stakeholders to analyse.

75. Specifically, only one example appraisal is provided for the PBSA typology (100-bed). This is inadequate and all appraisals for non-residential typologies (notably PBSA) should be issued.

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[7] RICS (2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England, RICS Guidance Note
[8] RICS (2019) RICS Professional Statement: Financial viability in planning: conduct and reporting, 1st Edition

Conclusions and Recommendations

77. The consortium cannot endorse or support CYC's proposed modifications to Policy H7: Off Campus Purpose Built Student Housing proposing introduction of an OSFC (at a rate of 2.5% affordable housing equivalent per student bedroom) towards traditional affordable housing secured from off campus PBSA development.

78. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

79. CYC's published evidence base underpinning the proposed modification introducing the OSFC is now out-of-date and can no longer be relied upon by CYC.

80. In the intervening period between the EX/CYC//107/2 – Appendix 1 Technical Note being produced and the CYC CIL Viability Study being published, market conditions have deteriorated – and continued to do so further since – up to present day.

81. The CIL Viability Study now supersedes the earlier EX/CYC//107/2 – Appendix 1 Technical Note and clearly demonstrates it there is no longer sufficient viability 'headroom' within the tested PBSA typologies to support this financial contribution.

82. CBRE has prepared additional up-to-date viability evidence within this representation. CBRE is of the firm professional opinion that there is no financial viability headroom in the current market for PBSA typologies to either meet the costs of the affordable OSFC sought via Policy H7 (as modified) or CIL.

83. PPG and RICS Guidance[9] requires that a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage.

84. On this basis, CYC's modifications proposed to Policy H7 to introduce an 2.5% affordable housing equivalent OSFC contribution per student room are not justified on the basis of appropriate and available evidence, would be expected to necessitate direct recourse to viability assessment and negotiation at the determination stage or may pose a material risk to PBSA development typologies being delivered off-campus at all. **It can only be concluded that this proposed requirement of Policy H7 is unsound and requires removal.**

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

Enclosures

Enclosure 1: Investment Yield Guides – Q1 2023

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

Knight Frank

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Based on rack rented properties and disregards bond type transactions

SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
Offices (Grade A)	City Prime (Single let, 10 years)	3.75%	4.00%	4.50% - 4.75%	4.75%	4.75%	4.75%		STABLE
	West End: Prime Core (Mayfair & St James's)	3.25%	3.25%	3.50% - 3.75%	3.75%	3.75%	3.75%		STABLE
	West End: Non-core (Soho & Fitzrovia)	3.75% - 4.00%	4.00%	4.25% - 4.50%	4.50%	4.50%	4.50%		STABLE
	Major Regional Cities (Single let, 15 years)	4.75% - 5.00%	5.00% - 5.25%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75%	-	STABLE
	Major Regional Cities (Multi-let, 5 year WAULT)	5.75% -	5.25% - 5.50%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
	South East Towns (Single let, 15 years)	5.00% - 5.25%	5.25%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%	6.00% - 6.50%		WEAKER
	South East Towns (Multi-let, 5 year WAULT)	6.50%	6.75% - 7.00%	7.00% - 7.50%	7.00% - 7.50%	7.00% - 7.50%	7.50%	+	WEAKER
	South East Business Parks (Single let, 15 years)	5.25% +	5.50% - 5.75%	6.75% - 7.00%	6.75% - 7.00%	6.75% - 7.00%	7.00%	+	WEAKER
	South East Business Parks (Multi-let, 5 year WAULT)	6.75% +	7.25% +	7.75% - 8.00%	7.75% - 8.00%	7.75% - 8.00%	8.50% +	+0.50%	WEAKER
	Life Sciences (Oxford, Cambridge)	3.75%	3.75%	4.25%	4.25%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
Warehouse & Industrial Space	Prime Distribution/Warehousing (20 years [NIY], fixed/indexed uplifts)	3.00%	3.50% - 3.75%	4.75% - 5.00%	4.75% - 5.00%	4.75% - 5.00%	4.75%	-	STABLE
	Prime Distribution/Warehousing (15 years, OMRRs)	3.50%	4.00% - 4.25%	5.25% - 5.50%	5.25% - 5.50%	5.25% - 5.50%	5.25%	-	STABLE
	Secondary Distribution (10 years, OMRRs)	4.00%	4.50% - 4.75%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 6.00%	5.50% - 5.75%	-	STABLE
	South East Estate (excluding London & Heathrow)	3.25% - 3.50%	4.00%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.50%	5.00% - 5.25%	-	STABLE
	Good Modern Rest of UK Estate	3.50% - 3.75%	4.25% - 4.50%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.75%	5.25% - 5.50%	-	STABLE
	Good Secondary Estates	4.75% - 5.25%	5.25% - 5.75%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%	6.50% - 7.00%		WEAKER
Specialist Sectors	Car Showrooms (20 years with fixed uplifts & dealer covenant)	5.00%	5.25%	5.75%	5.75%	5.75%	5.75%		STABLE
	Budget Hotels London (20 years, 5 yearly RPI / CPI uplifts)	3.25% - 3.50%	3.25% - 3.50%	4.50% - 4.75%	4.50% - 4.75%	4.50% - 4.75%	4.50%	-	STABLE
	Budget Hotels Regional (20 years, 5 yearly RPI / CPI uplifts)	4.00%	4.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00%	-	STABLE
	Student Accommodation Prime London (Direct Let)	3.75%	3.50%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%	3.75% - 4.00%		STABLE
	Student Accommodation Prime Regional (Direct Let)	5.00%	4.75% - 5.00%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%	5.00% - 5.25%		STABLE
	Student Accommodation Prime London (25 years, Annual RPI)	3.00% - 3.25%	3.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00%	-	STABLE
	Student Accommodation Prime Regional (25 years, Annual RPI)	3.25% - 3.50%	3.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25%	-	STABLE
	Healthcare (Elderly Care, 30 years, 5 yearly indexed linked reviews)	3.50%	3.25% - 3.50%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%	4.00% - 4.25%		STABLE
	Data Centres (Operational)	4.00% -	4.00%	4.00%	4.00%	4.00%	4.50%	+0.50%	STABLE
	Data Centres (Leased, 15 years, Annual Indexation)	4.00%	4.00% +	4.25% +	4.25% +	4.25% +	4.75%	+0.50%	STABLE
	Income Strip (50 years, Annual RPI/CPIH+1%, Annuity Grade)	2.25%	2.50% +	3.75% - 4.00%	4.00%	4.00%	4.00%		STABLE

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Prime Yield Guide – March 2023

Knight Frank Intelligence

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Knight Frank

Based on rack rented properties and disregards bond type transactions

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SECTOR		MAR-22	SEP-22	DEC-22	JAN-23	FEB-23	MAR-23	1 MONTH CHANGE	MARKET SENTIMENT
High Street Retail	Bond Street	2.75%	2.75% +	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%	2.75% - 3.00%		WEAKER
	Oxford Street	3.50% +	3.50% +	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%	4.25% - 4.50%		WEAKER
	Prime Towns (Oxford, Cambridge, Winchester)	6.25%	6.25%	6.75% +	6.75% +	6.75% +	6.75%	-	STABLE
	Regional Cities (Manchester, Birmingham)	6.50% +	6.50%	7.00% +	7.00% +	7.00% +	7.00%	-	STABLE
	Good Secondary (Truro, Leamington Spa, Colchester etc)	8.25% - 8.50%	8.25% 8.50%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%	9.00% - 9.25%		STABLE
Shopping Centres (sustainable income)	Regional Scheme	7.50%	7.50%	8.00%	8.00% +	8.00% +	8.00% +		WEAKER
	Sub-Regional Scheme	8.50%	8.50%	9.00% +	9.00% +	9.00% +	9.00% +		WEAKER
	Local Scheme (successful)	9.00%	9.25%	9.75% +	9.75% +	9.75% +	9.75% +		WEAKER
	Neighbourhood Scheme (assumes <25% of income from supermarket)	9.00% - 9.25%	9.00% - 9.25%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%	9.50% - 9.75%		WEAKER
Out of Town Retail	Open A1 Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Open A1 Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Bulky Goods Parks	5.25% -	5.00%	6.00% +	6.00% +	6.00% +	6.00%	-	STABLE
	Good Secondary Bulky Goods Parks	6.25% - 6.50%	6.25%	7.25% +	7.50% +	7.50% +	7.50%	-	STABLE
	Solus Open A1 (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
	Solus Bulky (15 year income)	4.75%	5.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%	5.75% - 6.00%		STABLE
Major Foodstores	Annual RPI Increases [NIY] (20 year income)	3.50%	3.75% - 4.00%	5.00%	5.00%	5.00%	5.00%		STABLE
	Open Market Reviews (20 year lease)	4.00%	4.25% - 4.50%	5.50%	5.50%	5.50%	5.50%		STABLE
Leisure	Prime Leisure Parks	7.00% +	7.00% +	7.50% +	7.50% +	7.50% +	7.50% +		STABLE
	Good Secondary Leisure Parks	8.00% +	8.00% +	8.50% - 8.75%	9.00% +	9.00% +	9.00% +		WEAKER

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Prime Yield Guide – March 2023

Knight Frank Intelligence

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Knight Frank

LEADING INDICATORS

The changing structure of the UK economy. Overall, UK economic output grew by +1% year on year in Q4, however, some sectors have recorded a significant increase. Indeed, the Arts & entertainment (+9%), Construction (+5%) and Professional & Scientific (+4%) industries saw increased output year on year in Q4 2022. However, some sectors including Production (-4%) and Manufacturing (-6%) saw output moderate. Here, the higher costs of materials, energy and labour likely weight on output. For the year ahead, the Bank of England forecast inflation to fall to 4% from 10%, which could alleviate some pricing pressures on these sectors that have seen output decline.

UK inflation continued to slow falling, for the third consecutive month, to 10.1% ahead of expectations. Producer price inflation also moderated, to 14.1%. The positive inflation news has left market commentators deliberating the BoE's next interest rate decision on 23 March. Capital Economics outlined that the likelihood of its forecast of 4.50% peak is lower now, while Oxford Economics expects the central bank to lift its rate by 25bps to 4.25% in March, where it will remain until at least the end of the year.

Flash PMIs for the UK surprised on the upside, with UK services businesses reporting growth for the first time in eight months (figure above 50). Indeed, the UK Services PMI increased to 53.3 in February, from 48.7 in January, beating market expectations of 49.2. Meanwhile, the Manufacturing PMI rose to 49.2 from 47.0 in January, exceeding market forecasts of 47.5.

DEBT MARKET – 27 FEBRUARY 2023

Debt margins have drifted out over the last quarter as a reflection of wider economic uncertainty and dislocation in the market.

Source: Macrobond

BONDS & RATES (01/03/2023)	MAR 2022	JAN 2023	FEB 2023	MAR 2023
SONIA Rate	0.445%	3.427%	3.927%	3.927%
Bank of England Base Rate	0.50%	3.50%	4.00%	4.00%
5-year swap rates	1.794%	4.050%	3.582%	4.308%
10-year gilts redemption yield	1.34%	3.53%	3.17%	3.81%

ESG

Refurbishing Offices

What are the economic and green challenges and opportunities from refurbishing office buildings?

Intelligence Lab

UK Retail Sales Dashboard – January 2023

An overview of UK retail performance, including key metrics on core sub-sectors and e-commerce.

Prime Yield Guide – March 2023

Knight Frank Intelligence

This yield guide is for indicative purposes only and was prepared on 1 March 2023.

KEY RESEARCH

UK CRE Quarterly Review – February 2023

The Quarterly UK RE Review outlines the key occupier and investment trends across the different sectors within commercial real estate.

Knight Frank V&A

Did you know

In addition to valuing assets in the main property sectors and having award winning teams in the Healthcare, Student and Automotive sectors, Knight Frank also has expertise in :

- Waste and Energy
- Infrastructure
- Garden Centres
- Film Studios
- Serviced Offices
- Data Centres
- Life Sciences
- Income Strips
- Ground Rents
- Trading assets
- Expert Witness
- IPOs

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We like questions. If you would like some property advice , or want more information about our research, we would love to hear from you.

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JLL SEE A BRIGHTER WAY

JLL Monthly Yield Sheet

January 2023

Best in Class Yields – Commercial

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Shops- High Street					
Prime	Weaker	**6.50**	6.50	6.50	6.50
Functional Towns	Weaker	**8.50**	8.50	8.25	8.00
Small Market Towns	Weaker	**10.50**	10.50	10.25	10.00
Shopping Centres					
Dominant Regional	Weaker	**7.25**	7.25	6.75	6.75
City Centre / Sub Regional	Weaker	**8.50**	8.50	8.00	8.00
Secondary Towns	Weaker	**14.00**	13.00	12.00	12.00
Retail Warehouses					
Prime Parks	Weaker	**6.00**	5.75	5.25	5.50
Secondary Parks	Weaker	**8.25**	8.25	7.75	9.00
Solus Units	Weaker	**6.25**	6.00	5.25	5.50
Foodstores - Supermarkets	Weaker	**5.25**	5.25	4.50	3.50
Leisure					
Leisure	Weaker	**8.50**	8.25	7.75	7.75
Offices					
City <£40m	Weaker	**4.50+**	4.50+	4.25	3.75
City £40m - £125m	Weaker	**4.50+**	4.50+	4.25	3.75
City >£125m	Weaker	**4.50+**	4.50+	4.25	3.75
West End <£40m	Stable	**3.75**	3.75	3.75	3.50
West End £40m - £125m	**Stable**	**4.00**	3.75	3.75	3.50
West End >£125m	**Stable**	**4.25**	4.00	4.00	3.50
Greater London Area Preferred	Weaker	**6.25**	6.00	5.75	5.00
South East Prime	Weaker	**6.50**	6.25	6.00	5.25
Regional City Prime	Weaker	**5.50**	5.25	5.25	4.75-
Sub Regional City Prime	Weaker	**6.75**	6.50	6.50	5.75
Life Sciences					
Life Sciences Prime	Weaker	**4.50**	4.50	4.25	3.75
Industrial/Logistics					
Regional Single Let	**Stable**	**5.50**	5.50	4.50	3.50
SE Single Let	**Stable**	**5.25**	5.25	4.25	3.25
London Single Let	**Stable**	**5.00**	5.00	4.00	3.00
Regional Multi Let	**Stable**	**5.50**	5.50	4.75	3.75
SE Multi Let	**Stable**	**5.25**	5.25	4.50	3.50
London Multi Let	**Stable**	**5.00**	5.00	4.00	3.00
Alternatives					
Car Showrooms	**Stable**	**5.50**	5.50	4.75	5.25
Self Storage (Prime)	**Stable**	**5.00**	5.00	5.00	4.75
Hotels London - Prime Covenant / 20 year term	Weaker	**4.25**	4.25	4.00	3.75
Hotels Regional - Prime Covenant / 20 year term	Weaker	**5.00**	5.00	4.50	4.25

Notes

1. Best in Class Yields relate to rack rented investments let with lease lengths considered by the market as most appropriate for the asset class.
2. Trending denotes investor sentiment towards the sector.
3. RPI/CPI uplifts on longer leases can achieve keener yields than those assessed at market rents.
4. Yields are based on transactions and sentiment.
5. Yields stated are Initial Yields for the Alternatives section based on 20 year unexpired leases to strong covenants with indexation/uplifts.
6. Supermarket yields are for 20 year leases with RPI indexed uplifts at 5 year intervals.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

Best in Class Yields – Living

Sector	Trending	Jan-23 %	Dec-22 -1 Months %	Oct-22 -3 Months %	Jan-22 -12 Months &
Elderly Care (NIY)					
Ultra Prime	Stable	**4.25+**	4.25+	3.25	3.50
Prime	Stable	**5.00+**	5.00+	4.00+	4.00+
Core	Stable	**6.00+**	6.00+	5.00+	5.00+
Secondary	Stable	**7.50**	7.50	6.50+	6.50+
Build to Rent (NIY) (Stabilised BTR Purpose Built)					
Prime London Zones 1-3	Weaker	**3.50-**	3.50-	3.25+	3.25+
Outer London Zones 4-6	Weaker	**3.75-**	3.75-	3.50+	3.50+
South East / South West Prime	Weaker	**4.00-**	4.00-	3.75+	3.75+
Prime Regional	Weaker	**4.00+**	4.00+	4.00+	4.00+
Secondary Regional	Weaker	**4.50+**	4.50+	4.50+	4.50
Purpose Built Student Accommodation (NIY) (Direct Let)					
Prime London	Weaker	**3.75+**	3.75+	3.50	3.75
Inner London	Weaker	**4.00+**	4.00+	3.75	4.25-
Super Prime Regional	Weaker	**4.75**	4.75	4.50	4.75+
Prime Regional	Weaker	**5.25**	5.25	5.00	5.00+
Secondary Regional	Weaker	**6.50**	6.50	6.25	6.25+
Other Regional	Weaker	**7.25**	7.25	7.00	7.00+
Purpose Built Student Accommodation (NIY) (25 Year FRI Leases)					
Prime London	Weaker	**3.75**	3.75	3.50	3.00
Inner London	Weaker	**3.75**	3.75	3.50	3.00+
Prime Regional	Weaker	**4.00**	4.00	3.75	3.25
Secondary Regional	Weaker	**4.25**	4.25	4.00	3.75
Other Regional	Weaker	**4.50**	4.50	4.25	4.00
JLL Prime Yield		**5.29**	5.24	4.83	4.51
Money Markets (3rd January 2023)					
UK SONIA Rate		**3.43**	2.93	2.19	0.19
SONIA 5 Years SWAP Rate		**3.95**	3.72	4.94	1.04
Gilt 10 years		**3.65**	3.10	4.18	1.17
Base rate		**3.50**	3.00	2.25	0.25

Notes

1. Yields are based on transactions and sentiment.
2. Trending denotes investor sentiment towards the sector.
3. BTR yields relate to professionally managed private residential assets of institutional grade.
4. PBSA yields relate to professionally managed purposed built student accommodation of institutional grade.
5. *JLL Prime Yield calculation includes both Commercial & Living Yields.*
6. Please note Money Market Yields are volatile - yields quoted as of date specified.
7. Colour Key – the colours in the trending and yield column indicate changes since previous month. Green: stronger than previous month, black: same as previous month, red: weaker than previous month.

Source: JLL, 13th January 2023. For indicative purposes only.

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CBRE

Investor interest is slowly returning to the market for Q1

- Signs of investor interest slowly returning to the market.
  Residential
- Strong rental growth for the upcoming academic year is mitigating yield expansion as market looks towards potential reversions.
  Student
- Transactions showing signs of stability ahead.
  Hotels

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
RESIDENTIAL						
London Zone 2 Prime	3.25	3.25	3.25	3.50	3.60	Weaker
London Zone 2 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
London Zone 3 to 6 Prime	3.35	3.35	3.35	3.65	3.75	Weaker
London Zone 3 to 6 Good Secondary	3.65	3.65	3.65	4.00	4.00	Weaker
Outer London and South East Prime	3.60	3.60	3.60	3.90	4.00	Weaker
Outer London and South East Good Secondary	4.00	4.00	4.00	4.50	4.50	Weaker
Regional Centres excluding South East Prime	4.00	3.85	3.85	4.15	4.15	Weaker
Regional Centres excluding South East Secondary	4.50	4.25	4.25	4.75	4.75	Weaker
Other Regional Centres Prime	4.40	4.15	4.15	4.50	4.50	Weaker
Other Regional Centres Secondary	5.00	4.75	4.75	5.25	5.25	Weaker

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
STUDENT ACCOMMODATION						
Central London Direct Let	3.65	3.50	3.50	3.75	3.75	Weaker
Super Prime Regional Direct Let	4.65	4.50	4.50	4.75	4.75	Weaker
Prime Regional Direct Let	5.00	4.75	4.75	5.00	5.00	Weaker
Secondary Regional Direct Let	8.00	8.00	8.00	8.50	8.50	Weaker
Central London RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Super Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Prime Regional RPI Lease	3.00	2.75	3.25	4.00	4.00	Weaker
Secondary Regional RPI Lease	4.00	4.00	4.50	5.25	5.25	Weaker
HOTELS						
Prime London Vacant Possession	4.50	4.50	4.50	4.75	4.75	Weaker
Prime London Management Contract	5.50	5.50	5.50	5.75	5.75	Weaker
Prime London Lease	3.75	3.75	3.75	4.50	4.50	Weaker
Prime Regional Vacant Possession	6.75	6.75	6.75	7.25	7.25	Weaker
Prime Regional Management Contract	7.75	7.75	7.75	8.50	8.50	Weaker
Prime Regional Lease	4.25	4.25	4.25	5.25	5.25	Weaker

UNITED KINGDOM | LIVING SECTORS INVESTMENT YIELDS | MARCH 2023

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SPECIALIST SUPPORTED LIVING						
London/ SE Prime	5.25	5.25	5.25-5.50	5.25-5.50	5.25-5.50	Weaker
Regional UK Prime	5.25-5.75	5.25-5.75	5.25-5.75	5.40-5.85	5.40-5.85	Weaker
Secondary	6.00	6.00	6.00	6.25	6.25	Weaker
Tertiary	6.25+VP-Resi	6.50+VP-Resi	6.50+VP resi	6.75 –VP-Resi	6.75-VP-Resi	Weaker
INTEGRATED RETIREMENT COMMUNITIES						
London/ SE Prime	N/A	N/A	N/A	N/A	5.00.5.25	Weaker
Regional UK Prime	4.25-5.00	4.25-5.00	4.25-5.00	5.00-5.25	5.50	Weaker
Secondary	6.00	6.00	6.00	6.00	6.00	Weaker
Tertiary	N/A	N/A	N/A	N/A	N/A	Weaker
ELDERLY CARE						
London/ SE Prime	3.5-4.0	3.5-4.0	3.75-4.00	4.00-4.25	4.00-4.25	Weaker
Regional UK Prime	4.5-5.5	4.25-5.00	4.50-5.50	4.75-5.75	4.75-5.75	Weaker
Secondary	7.00	7.00	7.25	7.50-8.00	7.50-8.00	Weaker
Tertiary	8.00	8.00	8.50	9.00	9.00	Weaker
PRIMARY CARE						
London/ SE Prime	3.50	3.50	3.60	4.00	4.00	Weaker
Regional UK Prime	3.75	3.75	3.85	4.25	4.25	Weaker
Secondary	4.50	4.50	4.65	5.35	5.25	Weaker
Tertiary	6.00	6.00	6.25	6.75	6.75	

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SHARED OWNERSHIP						
London/ SE Prime	2.90-3.00	2.90-3.00	3.00	3.00-3.25	3.10-3.25	Weaker
Regional UK Prime	3.00-3.15	3.00-3.15	3.00-3.25	3..15-3.35	3..15-3.40	Weaker
Secondary	3.15-3.35	3.15-3.35	3.25-3.50	3.25-3.50	3.25-3.75	Weaker
Tertiary	3.35-3.60	3.35-3.60	3.50	3.50-3.75	3.50-3.90	Weaker
AFFORDABLE RENT						
London/ SE Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.75-4.15	3.75-4.15	Weaker
Regional UK Prime	4.00-4.25	4.00-4.25	4.00-4.25	4.15-4.40	4.15-4.50	Weaker
Secondary	4.25-4.50	4.25-4.50	4.25-4.50	4.40-4.65	4.40-4.65	Weaker
Tertiary	4.50-4.75	4.50-4.75	4.50-4.75	4.65-490	4.75	Weaker
SOCIAL RENT						
London/ SE Prime	3.50-3.75	3.50-3.75	3.50-3.75	3.65-3.90	3.70-4.00	Weaker
Regional UK Prime	3.75-4.00	3.75-4.00	3.75-4.00	3.90-4.15	3.75-4.15	Weaker
Secondary	4.00-425	4.00-425	4.00-425	4.15-4.40	4.15-4.40	Weaker
Tertiary	4.25-450	4.25-450	4.25-450	4.40-4.65	4.50.4.75	Weaker

Positive start to Q1 with a number of transactions exchanging but pricing remains uncertain with evidence of falling house prices

Single Family Housing

	Mar 22 (%)	Jun 22 (%)	Sep 22 (%)	Dec 22 (%)	Mar 23 (%)	Trend
SINGLE FAMILY HOUSING						
South East Prime	3.50 - 3.75	3.50 - 3.75	3.50 - 3.75	3.70 – 3.85	3.70 – 3.85	Weaker
South East Secondary	3.75 – 3.90	3.75 – 3.90	3.75 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Prime	3.65 – 3.90	3.65 – 3.90	3.65 – 3.90	3.85 – 4.00	3.85 – 4.00	Weaker
South West Secondary	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.15	4.00 – 4.15	Weaker
East of England Prime	3.75 - 4.00	3.75 - 4.00	3.75 - 4.00	3.85 – 4.00	3.85 – 4.00	Weaker
East of England Secondary	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.00 – 4.15	4.00 – 4.15	Weaker
West Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
West Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
East Midlands Prime	3.90 - 4.15	3.90 - 4.15	3.90 - 4.15	4.00 – 4.20	4.00 – 4.20	Weaker
East Midlands Secondary	4.15 - 4.40	4.15 - 4.40	4.15 - 4.40	4.20 – 4.40	4.20 – 4.40	Weaker
North West Prime	4.00 - 4.25	4.00 - 4.25	4.00 - 4.25	4.15 – 4.30	4.15 – 4.30	Weaker
North West Secondary	4.25 - 4.50	4.25 - 4.50	4.25 - 4.50	4.30 – 4.45	4.30 – 4.45	Weaker
North East including Yorkshire and the Humber Prime	4.10 - 4.35	4.10 - 4.35	4.10 - 4.35	4.25 – 4.40	4.25 – 4.40	Weaker
North East including Yorkshire and the Humber Secondary	4.35 - 4.60	4.35 - 4.60	4.35 - 4.60	4.40 – 4.55	4.40 – 4.55	Weaker

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Notes and Definitions

Residential

Our residential yields refer to institutionally managed, private rented residential assets within the UK (build to rent)

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to the previous month together with our own opinions and judgement
2) Net yields account for operational costs and relevant purchaser's costs
3) Prime refers to assets located in close proximity to transport notes, either brand new or with a high quality specification and level of amenity
4) Zone 2 and Zones 3 to 6 refer to London travel zones system managed by Transport for London

Hotels

1) Vacant possession upscale, stabilised year cap rate
2) Management contract upscale, no guarantee or underwrite, operated by an internationally renowned brand
3) Prime London lease reflects Zone 1, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain
4) Prime regional lease reflects prime UK city locations, prime covenants leaseholders whose ability to fulfil lease obligations is almost certain

Student Accommodation

The net initial yield, which is growth implicit, rather than the equivalent yield, is the key driver in the purpose built student accommodation sector. Allowance for purchaser's costs is made in calculating the net initial yield. All the yields assume completed and stabilised properties and ignore any discount for forward funding. Yields assume a generic lot size of £25m and running costs which a hypothetical purchaser would assume

1) Direct let a well located modern purpose built property of an operationally efficient scale with a strong letting track record and appropriate room mix
2) Central London well located single asset in London zone 1
3) Super prime regional towns and cities with restricted supply or restrictive planning policies
4) Prime regional mature markets with healthy supply and demand ratio and generally more than one university. There is a spread of towns and cities from the prime level to our secondary benchmark
5) Secondary regional towns and cities with perceived oversupply issues, new universities or secondary campuses
6) RPI lease well located, let to a strong university covenant, minimum of 25 years unexpired on FRI terms with annual RPI uplifts

Single Family Housing

Our yield ranges are indicative and represent our view of a stabilised investment.

1) The yield data provided reflects transaction exchanges and current bidding on investment market deals to date together with our own opinions.
2) They represent our indicative view of the net initial yield of a rack rented stabilised investment.
3) These yields represent a cluster of modern dwellings in a single location that would be sold in a single lot to an investor as part of a wider portfolio.
4) 'Prime' is defined as having excellent connectivity to key city hubs, transport links, local employment, amenity and schools, an established depth of rental demand with strong ESG credentials.
5) 'Secondary' - one or more of the above criteria is compromised or missing.
6) Net yields account for operational costs and relevant purchaser's costs.
7) Operational Cost Assumptions typically range between 18.0% - 22.5% (including voids) however we consider this will be analysed more on £ per unit basis as the market matures.
8) Our analysis and yields are indicative, for guidance only and may not be relied upon.

Enclosure 2: RICS BCIS – Rebased to York (March 2023)

BCIS®

£/m2 study

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

Last updated: 11-Mar-2023 05:56

› Rebased to York (97; sample 19)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
816. Flats (apartments)							
Generally (15)	1,680	835	1,395	1,586	1,891	5,792	856
1-2 storey (15)	1,600	993	1,346	1,509	1,786	3,297	183
3-5 storey (15)	1,653	835	1,390	1,579	1,873	3,531	574
6 storey or above (15)	1,994	1,226	1,632	1,867	2,137	5,792	96
856.2 Students' residences, halls of residence, etc (15)	2,151	1,227	1,919	2,166	2,389	3,500	55

Enclosure 3: Developer-led (Off-campus) PBSA Development Typology Appraisals (Excluding Modified Policy H7 OSFC)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 5 100 (V4)

Currency in £

REVENUE

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.0000%	20.0000	11,229,988

NET REALISATION				**11,229,988**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			363,392	
				363,392
Stamp Duty			7,670	
Effective Stamp Duty Rate		2.11%		
Agent Fee		1.00%	3,634	
Legal Fee		0.80%	2,907	
				14,211
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	224,600	
				224,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			66,076	
Construction			584,710	
Total Finance Cost				650,786
TOTAL COSTS				**9,358,323**
PROFIT				
				1,871,665

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	30.31%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 11 200 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 200 bed typology	200	37,135	43.20	8,021	1,123,000	1,604,285	1,123,000

Investment Valuation					
Student accommodation - 200 bed typology					
Current Rent	1,123,000	YP @	5.0000%	20.0000	22,459,990

NET REALISATION				**22,459,990**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			409,788	
				409,788
Stamp Duty			9,989	
Effective Stamp Duty Rate		2.44%		
Agent Fee		1.00%	4,098	
Legal Fee		0.80%	3,278	
				17,366
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 200 bed typology	57,135	221.90	12,678,221	
Externals		10.00%	1,267,822	
Site Abnormals	0 ac	400,000 /ac	184,000	
Contingency		4.00%	557,842	
				14,687,885
Other Construction				
Policy CC1, CC2 & CC3	200 un	2,250.00 /un	450,000	
Policy G12 BNG	0 ac	15,000 /ac	6,900	
				456,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,115,683	
				1,115,683
DISPOSAL FEES				
Sales Agent Fee		2.00%	449,200	
				449,200
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			92,674	
Construction			1,487,163	
Total Finance Cost				1,579,837
TOTAL COSTS				**18,716,658**
PROFIT				
				3,743,332

Performance Measures	
Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

APPRAISAL SUMMARY CBRE

PBSA Typology
200 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	26.37%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 16 350 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 350 bed typology	350	64,987	43.20	8,021	1,965,250	2,807,500	1,965,250

Investment Valuation

Student accommodation - 350 bed typology					
Current Rent	1,965,250	YP @	5.0000%	20.0000	39,305,000

NET REALISATION				**39,305,000**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			379,270	
				379,270
Stamp Duty			8,463	
Effective Stamp Duty Rate		2.23%		
Agent Fee		1.00%	3,793	
Legal Fee		0.80%	3,034	
				15,290
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 350 bed typology	99,975	221.90	22,184,452	
Externals		10.00%	2,218,445	
Site Abnormals	1 ac	400,000 /ac	304,000	
Contingency		4.00%	976,116	
				25,683,014
Other Construction				
Policy CC1, CC2 & CC3	350 un	2,250.00 /un	787,500	
Policy G12 BNG	1 ac	15,000 /ac	11,400	
				798,900
PROFESSIONAL FEES				
Professional Fees		8.00%	1,952,232	
				1,952,232
DISPOSAL FEES				
Sales Agent Fee		2.00%	786,100	
				786,100
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			99,231	
Construction			3,040,130	
Total Finance Cost				3,139,361
TOTAL COSTS				**32,754,167**
PROFIT				
				6,550,833

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%

APPRAISAL SUMMARY CBRE

PBSA Typology
350 Units
Excludes Policy H7 2.5% OSFC/room

IRR% (without Interest)	24.15%
Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY CBRE

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 21 600 (V4)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 600 bed typology	600	111,406	43.20	8,021	3,369,000	4,812,857	3,369,000

Investment Valuation

Student accommodation - 600 bed typology					
Current Rent	3,369,000	YP @	5.0000%	20.0000	67,379,998

NET REALISATION				**67,379,998**
OUTLAY				
ACQUISITION COSTS				
Residualised Price (Negative land)			(376,826)	
				(376,826)
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 600 bed typology	171,394	221.90	38,032,329	**38,032,329**
Externals		10.00%	3,803,233	
Site Abnormals	2 ac	400,000 /ac	652,000	
Contingency		4.00%	1,673,422	
				6,128,655
Other Construction				
Policy CC1, CC2 & CC3	600 un	2,250.00 /un	1,350,000	
Policy G12 BNG	2 ac	15,000 /ac	24,450	
				1,374,450
PROFESSIONAL FEES				
Professional Fees		8.00%	3,346,845	
				3,346,845
DISPOSAL FEES				
Sales Agent Fee		2.00%	1,347,600	
				1,347,600
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			(105,374)	
Construction			6,402,315	
Total Finance Cost				6,296,941
TOTAL COSTS				**56,149,993**
PROFIT				
				11,230,005

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.00%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	21.82%

PBSA Typology
600 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 4 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

Enclosure 4: Developer-led (Off-campus) PBSA Development 100-bed Typology Appraisal (Excluding Modified Policy H7 OSFC) with Funding Yield at 5.25% (Sensitivity)

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room
Funding Yield at 5.25%

Development Appraisal
CBRE
24 March 2023

APPRAISAL SUMMARY — CBRE

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Appraisal Summary for Phase 6 100 (V4 b)

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
Student accommodation - 100 bed typology	100	18,568	43.20	8,021	561,499	802,142	561,499

Investment Valuation

Student accommodation - 100 bed typology					
Current Rent	561,499	YP @	5.2500%	19.0476	10,695,227

NET REALISATION				**10,695,227**
OUTLAY				
ACQUISITION COSTS				
Residualised Price			7,307	
				7,307
Agent Fee		1.00%	73	
Legal Fee		0.80%	58	
				132
CONSTRUCTION COSTS				
Construction	**ft²**	**Build Rate ft²**	**Cost**	
Student accommodation - 100 bed typology	28,567	221.90	6,339,110	
Externals		10.00%	633,911	
Site Abnormals	0 ac	400,000 /ac	68,000	
Contingency		4.00%	278,921	
				7,319,942
Other Construction				
Policy CC1, CC2 & CC3	100 un	2,250.00 /un	225,000	
Policy G12 BNG	0 ac	15,000 /ac	2,550	
				227,550
PROFESSIONAL FEES				
Professional Fees		8.00%	557,842	
				557,842
DISPOSAL FEES				
Sales Agent Fee		2.00%	213,905	
				213,905
FINANCE				
Debit Rate 8.500%, Credit Rate 0.000% (Nominal)				
Land			1,302	
Construction			584,710	
Total Finance Cost				586,012
TOTAL COSTS				**8,912,689**
PROFIT				
				1,782,538

Performance Measures

Profit on Cost%	20.00%
Profit on GDV%	16.67%
Profit on NDV%	16.67%
Development Yield% (on Rent)	6.30%
Equivalent Yield% (Nominal)	5.25%
Equivalent Yield% (True)	5.43%
IRR% (without Interest)	31.69%

PBSA Typology
100 Units
Excludes Policy H7 2.5% OSFC/room

Rent Cover	3 yrs 2 mths
Profit Erosion (finance rate 8.500)	2 yrs 2 mths

RUSSELL GROUP STUDENTS' UNIONS

Student Cost of Living Report

Research commissioned by Russell Group Students' Unions

Carried out by Students' Union UCL

Contents

Foreword

The current cost of living crisis has been impacting everyone across society – from rising bills to record high food costs, to concerns over job security and the impact on our mental health. Throughout this crisis, however, students have been forgotten.

We, as elected representatives for students at Russell Group universities, commissioned this research to better understand the experiences of students and how we, universities and the government can help. The results are deeply concerning, although sadly not surprising for those of us who are hearing from struggling students daily.

This survey highlights the immense financial pressure on students. On average, students are sitting below the poverty line for the UK. 1 in 5 are considering dropping out because they cannot afford to continue, and 1 in 4 are regularly going without food and necessities. Students are unable to increase their earnings anywhere near the rate of inflation, with most working zero-hour, minimum wage jobs, and many struggling to increase their incomings, whether this is due to struggling to balance studies alongside increased working hours, or whether this is explicit working restrictions such as those imposed on our international student community.

Throughout this, financial support is inadequate, poorly understood and communicated, and often inaccessible to students. Groups of students who are already disadvantaged in education are hit the hardest, and this study shows that the cost of living crisis is posing a significant threat to our diverse and vibrant university communities – students except those from the most privileged backgrounds are set to be priced out of education.

It is clear that the impact of the cost of living on students is systemic and widespread, and requires an urgent, coordinated approach for targeted student support from the government and the sector. Maintenance loans need to rise in line with inflation, and grants should be reintroduced to support our most disadvantaged students. The parental threshold for maximum student finance support, which has been frozen since 2008 despite average earnings increasing significantly, needs to be reviewed. There needs to be sector-wide best practice agreed regarding university-run hardship and financial assistance funds. International students need more flexibility in their working restrictions, and should be able to access university financial hardship funds as standard.

Crucially, this research shows that students should be recognised as an at-risk group. They are particularly vulnerable to financial insecurity and hardship, and yet are often ignored or overlooked in conversations around poverty and cost of living. If we do not step up for students now, we run the risk of allowing UK higher education to become one only for the most privileged in society, and undoing decades of access and participating work in the sector.

Russell Group Students' Unions Officers

Students have been forgotten during the cost of living crisis. We surveyed students from 14 Russell Group institutions and found...

94% of students are concerned about the cost of living crisis

"I cry myself to sleep multiple times a week because my finances are killing my mental health."

1 in 4 students is regularly going without food or necessities because they cannot afford them

We received 8,800 responses

Over 50% of students have had to borrow money in the last year alone

54% of students believe that their academic performance has suffered due to the cost of living crisis

Only 1 in 2 students are confident that they have enough money to cover their basic living costs

On average, students were left with only £50 per month

72% of students feel that their mental health has suffered due to the cost of living crisis

Average income of only £825 per month

"I have had to miss classes because I've had to work in order to be able to eat."

"Everything is difficult but no one understands."

Income

"I am dependent on my overdraft"

The average student falls below the poverty line

The median income per month for students is £824, including income from maintenance grants, bursaries, paid employment and familial contributions. After housing costs (with the average student rent estimated at £535/month[1]), the average student respondent to this survey is likely to fall under the UK poverty line[2]. This leaves our respondents with £72 per week, and would put our respondents only £2 over the destitution line for the UK[3].

After paying for all expenses including bills and food, students are left with £50 each month to live off (median, weighted). This falls to £30 for international students, and rises to £100 for home students. More than 1 in 5 (22%, N = 5953, weighed) students have less than £100 in their savings account.

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

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

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

"I work the max amount that I can, yet I barely can cover my rent let alone anything else. ***I miss meals. I have had my physical and mental health deteriorate. I worry every day about how much change I have left.*** *And it was a 4-month long struggle with the university to even get any help."*

"The Cost of living crisis was always present for me, as in I come for Europe where higher education is practically free. My parents did not save, or expect me to go abroad. London is so very expensive. They are not rich and are in debt and refused to get me a loan to prevent me from getting to the same place in life as them. ***I have cried many nights about my choices to come to London where it is so very expensive to live and study.*** *I regret my choice because of the financial burden I have placed on my family."*

Students from socioeconomically disadvantaged backgrounds (measured by household income and level of parental education) rely more heavily on income sources such as maintenance loans, bursaries and hardship funds, whereas students from more advantaged backgrounds see parental contribution to expenses increase. Disadvantaged students are also significantly (p = < 0.001) more likely to have to borrow money to pay for rent or bills, with 3 in 5 (59%, N = 1048/1786) students with a household income of under £25,000/year reporting having borrowed money whilst at university, compared to 44% (N = 365/839) of students from the highest household income brackets (£75,001 or more). Similarly, students whose parents have no educational qualifications are nearly 1.5x more likely to have borrowed money compared to those whose parents hold a degree qualification or equivalent (59%, N = 247/418 vs 51%, N = 1854/3621).

17% (N = 464/2460, Figure 1) of students in paid employment are working more than 30 hours per week. This rises to 24% (N = 100/415) for disabled students, 40% (N = 257/639) for mature students, 36% (N = 55/153) for estranged or care experienced students and 35% (N = 81/235) for those with caring responsibilities.

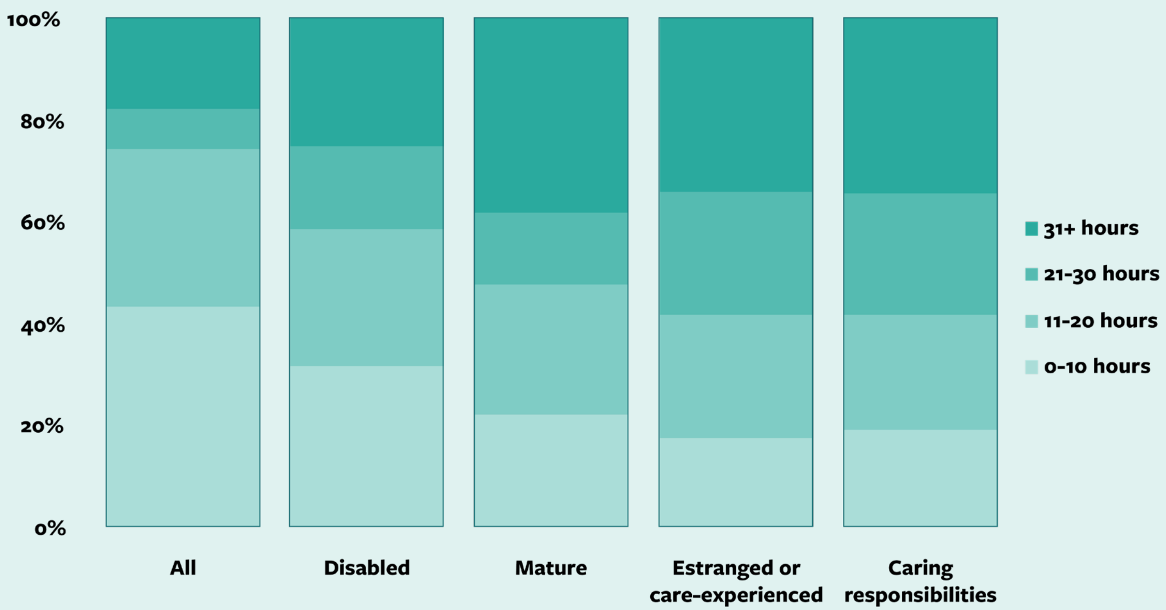


Figure 1: Stacked bar graph showing proportion of hours worked for students in paid employment by demographics (N=2460)

13% (N = 6327, weighted) of students are relying on overdrafts, and 6% (N = 6327, weighted) are using credit cards. Only 5% (N = 6327, weighted) have received financial support from a university hardship fund this academic year. Part-time (17%, N = 53/321), Black (16%, N = 28/171), home (16%, N = 513/3222) and disabled (16%, N = 141/881) students are all more likely to be relying on overdrafts. Similarly, disabled (6%, N = 55/881), students who are estranged or care-experienced (6%, N = 20/323), Black students (6%, N = 10/171), students with household incomes of under £25,001/annum (6%, N = 107/1895), and students studying outside of London (5%, N = 118/2156) are the most likely groups to have received financial support from their university.

Impact

Students report wide-ranging and significant impacts from the cost of living crisis, whether that is on their academic studies and career prospects, their mental health, their physical health, or their social development and relationships (Figure 2). Most commonly students report that their 'general student experience' has suffered due to the cost of living crisis, with 4 in 5 (79%, N = 5581, weighted) students reporting this, followed closely by their social life (73%, N = 5591, weighted), and their mental health (72%, N = 5595, weighted). 94% of students report that they are concerned about the current cost of living crisis (N = 5596, weighted).

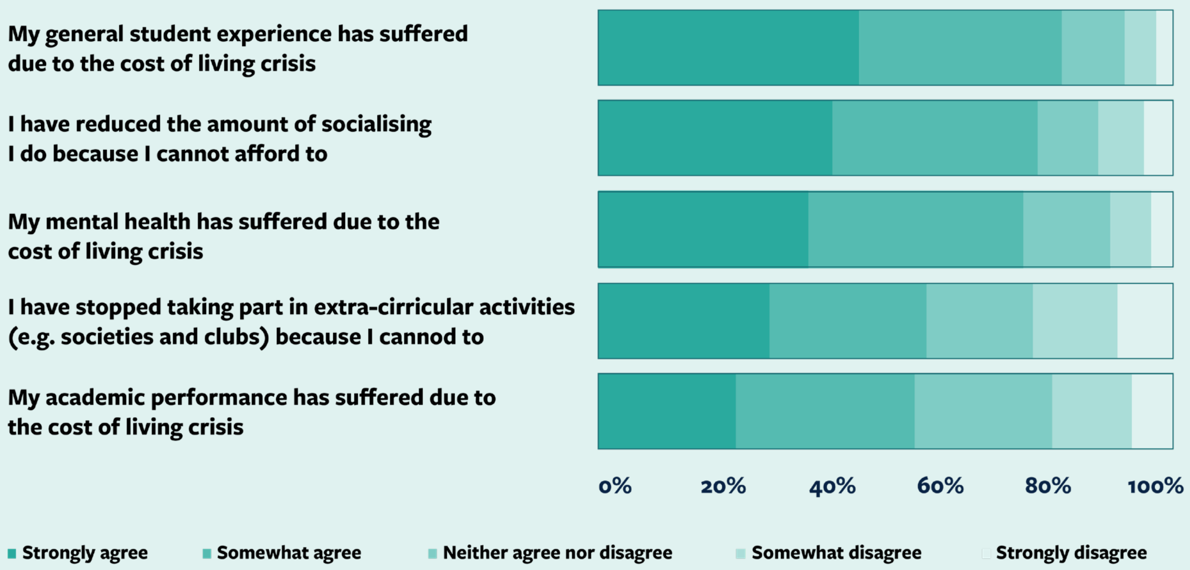


Figure 2. Stacked bar graph showing responses (N=5596) to likert-scale questions on the impact of the cost of living crisis

Whilst facing increasing financial pressures due to rising costs and limited ability to increase earnings (e.g. full time students struggling to work increased hours alongside their studies, or international students restricted to 20 hours a week), students note that socialising, extra-curricular activities and 'non-essentials' such as preventative health care (i.e. dental care) and mental health support are the first to go when cutting back. Students' academic studies are also impacted, particularly for students juggling additionally responsibilities such as childcare or having to take on additional paid work, and for students who already face additional barriers in education such as estranged and care-experienced students.

Having to choose between food and university

1 in 5 students have considered dropping out

Over half (54%, N = 5589, weighted) of students are seeing their academic performance suffer due to the cost of living crisis. Reported negative impacts range from the direct and immediate, with students skipping classes to work more shifts or considering dropping out entirely due to financial pressures, to indirect impacts related to the ways in which the crisis intersects with health outcomes and nutrition, making concentrating on studying difficult or impossible.

19% (N = 5584, weighted) of all students have considered deferring their studies and 18% (N = 5582, weighted) have considered dropping out because they could not afford to continue. Students from disadvantaged socioeconomic backgrounds, disabled students, students who are estranged or care-experienced, and students with caring responsibilities are significantly more likely to be facing negative academic impacts and struggling to continue with their studies.

While 54% (N = 5589, weighted) of all students agree their academic performance has suffered due to the crisis, this rises to 71% (N = 278/389) for students whose parents have no educational qualifications. Estranged students, students with caring responsibilities, and disabled students are most likely to report considering dropping out of university. For estranged students, the lack of a familial safety net exacerbates their financial precarity. One estranged student said that they “can’t afford to engage with the [academic] material”, which “perpetuates the difficulties posed to those who deserve the opportunity to study, but with no familial/financial safety net”. Another commented that “the university system is created to benefit white middle class students from stable backgrounds”.

The likelihood that a student has considered dropping out or deferring due to financial difficulties gradually decreases as household income increases (Figure 3), however it is only for students from the highest income households (£75,000 or more per annum) that this drops below 15% for either question, suggesting that, whilst the impact is felt most strongly for those from the lowest income households, higher education during the cost of living crisis is becoming increasingly unaffordable to any students except those from the most advantaged backgrounds.

The top five groups who reported they had considered dropping out because they could not afford to continue were:

- **Estranged or care-experienced students** (37% (N = 127/343)
- **Students with caring responsibilities** (34% (N = 169/500)
- **Disabled students** (33% (N = 301/904)
- **Non-binary students** (30%, N = 40/129)
- **Part-time students** (28%, N = 91/319)

Each of these groups were statistically more likely to report considering to dropout of university.

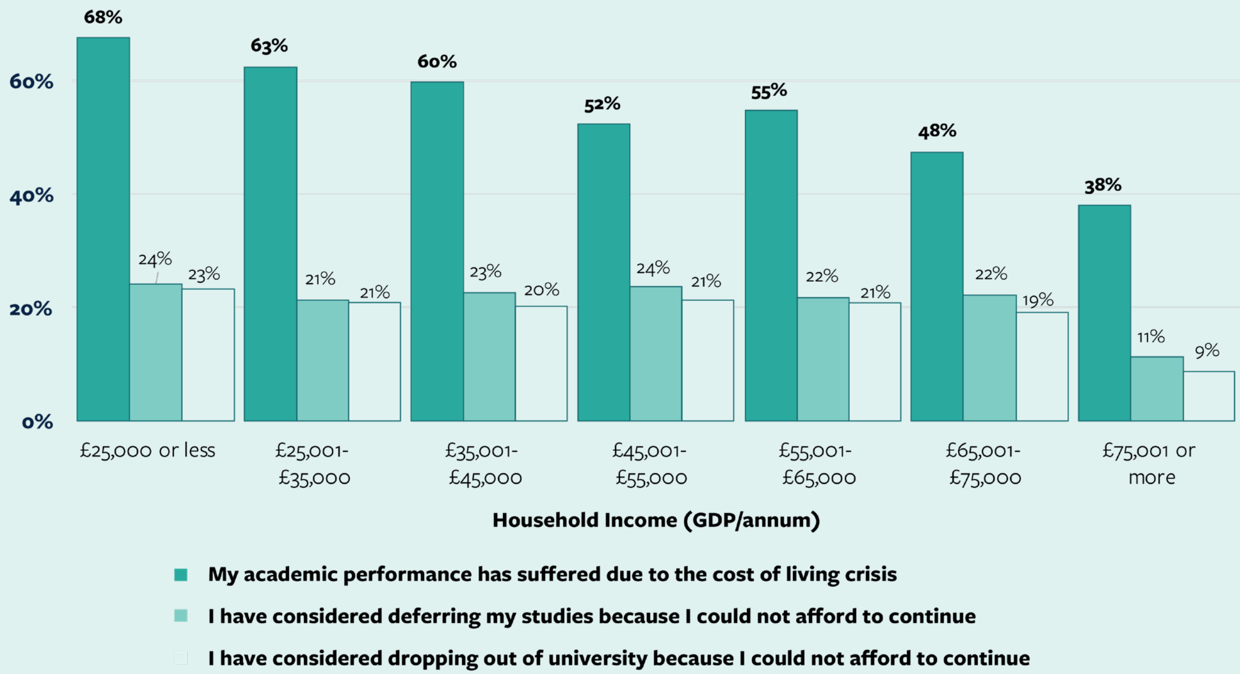


Figure 3: Grouped bar graph showing % agree by household income (GDP/Annum)

Students, particularly those from less advantaged backgrounds, commonly reported being forced to work increasingly long hours to pay for rising bills and living costs, or to take on multiple jobs. On average students are working 15 hours a week (weighted median), a figure rising to 25 hours for students with caring responsibilities (N = 235), estranged or care-experienced students (N = 153), and postgraduate research students (N = 404), and 32 hours for part time students (N = 218). Not only are students working significantly increased hours, but they also often report that the nature of the work is precarious and poorly paid. Respondents highlight that the precarity of having a job on a "zero hour contract" means that they "have to take shifts as they are available and cannot plan very far ahead". Others link their struggles to low pay, with one stating that "minimum wage does not match the rapid rise in the cost of living" and another that "in the two industries of work in which I have experience, hospitality and care, wages have been almost stagnant". Research by CIPD found that almost a quarter (23%) of full-time students aged 16-24 with a job were on a zero-hours contract, higher than any other age group[4].

Students are also seeing their studies impacted due to high costs of transport, with many having to study from home due to not being able to afford the cost of going into campus, even in well-connected cities such as London. Students report missing timetabled lectures and labs or skipping teaching entirely where they would have to travel, especially at peak hours. However, respondents' homes are often not fit to study in, with many reporting that their accommodation is small and/or poor quality, and that they have been unable to turn the heating on during winter, leaving them studying in the cold and becoming unwell. This tough choice many are facing was summarised by one student: "it's hard to work at home in these conditions, but expensive to travel to university and work there".

> ***"It's been a nightmare. Having to choose between food or funding something for Uni, and then being at risk of failing my degree."***

60% (N = 612/1019) of postgraduate research students feel that their academic performance has suffered due to the crisis, higher than any other study level. One PhD student stated that "it is becoming impossible to balance rent, utilities and food on the UKRI studentship rate", and another commented that for those whose research is lab based and requires you to be on campus every day, this has become "financially unviable". Similarly, International student respondents highlight the additional pressures and barriers they face which is exacerbating the impact of the cost of living crisis on them and their studies, with 59% (N = 1029/1746) reporting that their academic performance has suffered. International students report that visa limits on working hours, having no recourse to public funds, high tuition fees and limited access to financial support has led to significant financial insecurity and in turn impacts negatively on their studies.

"I have not been able to take part in some extracurricular activities which would benefit my learning and future career, *such as research projects/fieldwork, because I cannot afford this between the tuition fee and general cost of living."*

"Due to the living costs and having to buy so many research supplies and make research trips, ***I have used the majority of my savings.*** *I have had to move back with my parents as a result, which is nowhere near my university or the archive I need to access."*

"I have sadly decided not to attend an international conference in my field happening later this year. ***Being financially vulnerable means I am missing out on opportunities other students an easily have.*** *I am not having equal access to the same level of education and opportunities as other students due to my financial restrictions.* ***I routinely miss out on opportunities*** *such as this conference experience."*

"I also take on a lot of [graduate teaching assistant] work to try and supplement my stipend, as it is not enough to live on. This means I am able to spend less time on my PhD, which impacts my academic performance. ***PhD students shouldn't have to teach to live."***

"As an Iranian international student, I had to work and study and get money from my parents to just pay for one instalment [of tuition]. ***I could hardly focus to study, seeing my parents suffering every year to make the money I need for my tuition fees.*** *[My] mental health break down led to me failing the last year and had to repeat my modules this year."*

"It is extremely difficult to make ends meet as an international student with limited working hours during term time. The high fees add to the burden of paying off student loans, and lack of scholarships all tie in together to ruin a person's mental health. ***Academic performance is suffering due to financial stressors and being unable to afford basic necessities is affecting social life."***

The negative academic impacts of the cost of living crisis on students' academic experience is worsening existing concerns over the graduate job market and exacerbating low levels of skills confidence in our student population. Respondents commonly spoke about how financial difficulties result in concerns that they will not be able to achieve a high grade, and therefore will not stand out as competitive candidates in a tough graduate job market.

Many students are questioning whether their degree is 'good value for money', although this is unrelated to the quality of the course or content taught but reflective of concerns that their financial insecurity will prevent them from achieving a good grade, and therefore securing a good graduate job. This is often due to the high number of hours students are needing to work to meet basic expenses and the impact on their mental health that financial stress is having, all distracting from their studies and academic development.

Just 43% (N = 5580, weighted) of all students are confident about finding work after graduation, a figure that drops to 41% (N = 1213/2962) for undergraduate students. One student stated that employment post-graduation was the area which concerns them the most: "I am worried that due to the financial situation of the world right now, the workplace may be looking to increase salary cuts and layoffs rather than hiring university students". This worry is particularly acute for estranged students or students who are unable to move back in with their parents after graduating. Another student states that "I often worry about how I will pay for expenses after my degree finishes because there is no guarantee I'll get a job straight out of university and I don't see inflation slowing down anytime soon".

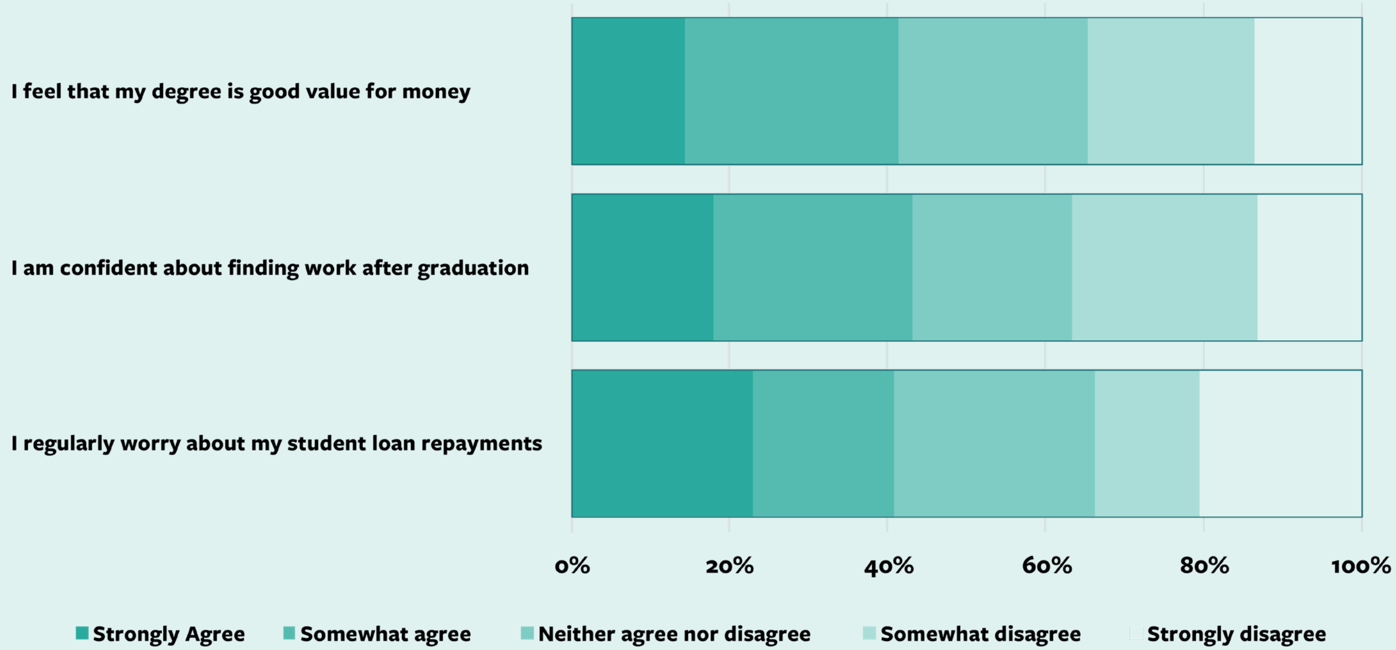


Figure 4: Stacked bar graph showing responses (N=5596) to likert-scale questions on the impact of the cost of living crisis

"I am an independent student who worked hard on the last 4 years to be able to go to university. I moved to London and started university thinking I would be fine because I had the opportunity to apply for a student loan, but I have been having problems with them because they keep delaying and during Christmas time they decided to cancel it. I have been struggling to do the course work, work part time and sort out my life, but I didn't have experience to be able to get a job as soon I moved to London. At the moment I cannot afford food or pay rent and with the cost of living crisis, ***I am scared I would not survive this year at university."***

"I am quite worried about how the cost of living crisis will affect my future career prospects and I feel more and more inclined to look for opportunities abroad. However, the financial burden of this is also weighing on me quite heavily. ***I feel very scared about my future after graduation*** *if I am struggling to afford necessities right now and* ***I am finding it increasingly difficult to make the most of my final year socially and emotionally."***

"It has made it hard to balance worrying about money with studies, and has ***increased the pressure to find a good job as soon as a graduate,*** *in order to pay off my overdraft which I have had to use for food etc whilst studying."*

Impact on Health

"It is ruining everything"

1 in 4 students regularly go without food

Students commonly report that the cost of living crisis is having a negative impact on both their physical and mental health. 72% (N = 5595, weighted) of all students reported that their mental health has suffered due to the ongoing cost of living crisis, and 1 in 4 (25%, N = 5591, weighted) regularly go without food or necessities because they cannot afford them. Students from London were, on average, significantly (p = < 0.01) more likely than students outside of London to report an impact on their mental health (75%, N = 2725/3624 vs 72%, N = 1393/1936). Students from marginalised communities -- such as disabled students, estranged or care-experienced students and those from socioeconomically disadvantaged backgrounds -- and who are already at higher risk of poorer health outcomes, were more likely to report regularly going without food.

Where students are unable to match rising costs by taking on more work, they are cutting back on spending money on things they deem 'less essential', such as heating, non-emergency health care and socialising. Many students report not turning on the heating at all over winter, given rapidly rising energy bills, which led to detrimental impacts on their health – and by extension, their ability to study and succeed academically. For one student, being "unable to afford to heat my flat" meant that they "fall ill every few weeks", with "very negative effect(s) on my studies". Another reported that not using the heating "has led to mould growing in all the rooms, leading to the worst asthma symptoms I've ever had". Almost 7 in 10 students would not be able to afford the costs of an emergency, including emergency dental or medical treatment. One student reported that "At the moment I have 3 jaw teeth from both sides that are broken and need urgent treatment, since I cannot afford it so I am living on Ibuprofen and other painkillers regularly".

Students also report cutting back on food, relying increasingly on cheap food with poorer nutrition, and skipping meals.

The top five groups who reported regularly going without food or necessities were:

- **Students with caring responsibilities** (40%, N = 203/504)
- **Estranged or care-experienced students** (39%, N = 137/347)
- **Disabled students** (36%, N = 323/906)
- **Students whose parents have no qualifications** (34%, N = 133/389)
- **Black students** (33%, N = 55/169)

Each of these groups were statistically more likely to report regularly going without food or necessities.

"Food in London is also quite expensive, so I often went to the supermarket to buy discounted food and stock up in the fridge. ***I spend very little money on food, sometimes just one meal a day."***

Disabled students are seeing their health particularly impacted by the crisis. One student said that "the particular impact on disabled students is often overlooked", raising the issue of unexpected costs such as "travel to appointments or the hospital". This is reflected in the responses to the question of whether students would be able to cover the cost of an emergency, with just 27% (N = 240/905) of disabled students saying yes compared to 34% (N = 1464/4318) of students with no disability.

"I have found that ***groceries are much more expensive, which makes it hard to cook large and healthy meals*** *and as such it can feel* ***harder to focus throughout the day whilst studying*** *as I do not want to spend the extra on snacks and healthy food."*

"The food at university is so highly priced that ***I cannot even remember the number of meals that I have skipped to save money."***

"The cost of heating the flat is too high and so we don't use it. We've had mould around the windows. In late 2022, ***I had to take a week off of university due to illness that I blame on the cold, or, at the very least, I blame the slow recovery on.*** *This put me significantly behind my study schedule."*

"Living on dwindling savings and ***not having the financial safety net to deal with emergency situations is stressful.*** *On top of that, you don't have enough money to socialise, support family, or pay for some mental and physical healthcare costs (e.g. therapy and dental)."*

"Parents of children are not always considered in funding. I have children and a disability. ***Financially, university is an immense strain."***

"I am estranged, so this comes with extra financial pressure. *Additionally, I have disabilities and mental health conditions that mean I need extra support in order to study as there are financial implications here too. I would say there is already more financial pressure on the people who are marginalised and the cost of living risis only exacerbates this.* ***It would be great to see additional financial support specifically for students who are in more vulnerable situations through no fault of their own."***

The top five groups who reported a significant negative impact on their mental health were:

- **Students whose household income is below £25,000/annum** (83%, N = 1389/1679)
- **Disabled students** (82%, N = 739/905)
- **Non-binary students** (82%, N = 106/129)
- **Students whose parents have no educational qualifications** (81%, N = 317/390)
- **International students** (78%, N = 1357/1747)

Each of these groups were statistically more likely to have their mental health negatively impacted by the cost of living crisis.

Mental health was the most commonly reported impact of the cost of living crisis from students, with over 300 of the qualitative comments discussing the negative impact that the cost of living crisis is having on their mental health. Students are continually worrying about their finances and whether they will be able to afford necessities, socialising less which in turn exacerbates student loneliness, feeling guilty about the strain they are putting on family members who are supporting them, and anxiety regarding the graduate job market has been heightened.

For many students, difficulties finding affordable accommodation has exacerbated the negative impact the cost of living crisis is having on their mental health. One student said, "Honestly it made me suicidal, emotionless, and [feel] empty", explaining how they ran out of savings due to poor health forcing them to defer their master's programme twice. Speaking to the impact of rising rent, they said, "My rent doubled in the past 2 years, I cannot afford to heat my house, eat only cheap and basic food, cannot socialise."

"My student loan doesn't even cover my bills not even considering food. ***I have to earn an additional £500 each month just to pay my rent, electricity, Wi-Fi, transport etc and that's not including food or any sort of fun.*** *This is generally really getting me down and I'm becoming super stressed. I love university and my course, and I am currently applying to graduate schemes so hopefully I get a job and a 1st in my degree, and everything will get somewhat better towards the end of the year. But* ***currently I am massively struggling financially, and this is having huge effects on my mental health."***

"I knew London was a costly city before coming here but the cost of living crisis has only exacerbated this. ***Rent is astronomical and that is with me booking a cheap place further away from college.*** *Then my transport charges come up which makes me wonder if I made an unwise decision. I avoid eating out and am constantly thinking about my loans and how I'll pay for them. This involves me continually applying for jobs which affects my study time.* ***Overall mental health is tanking."***

"As a full-time postgrad student, I am not entitled to any government benefits, hence I need to cover all the costs - e.g., the rent and all the bills. ***Working whilst studying causes a lot of stress. I am constantly worried not having enough money, how I will survive from one month to next.*** *This impacts my anxiety levels and wellbeing in general."*

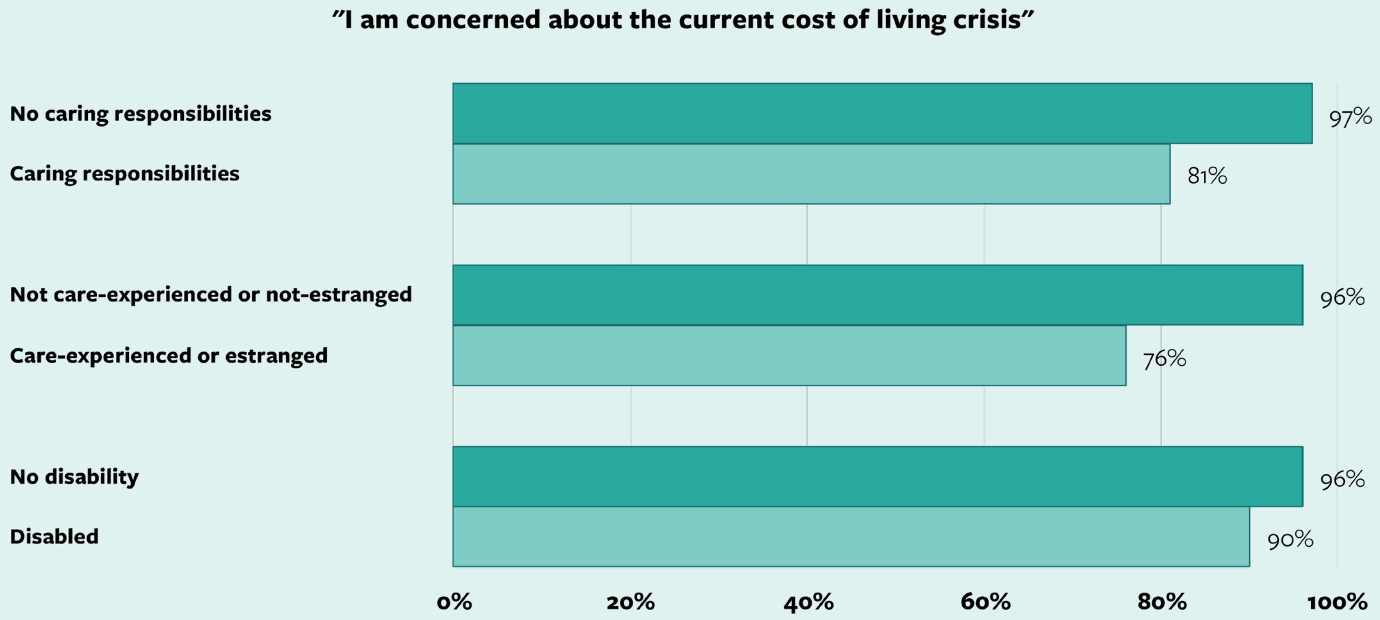


Figure 5: Grouped bar graph showing percentage of respondents who agreed to "I am concerned about the current cost of living crisis" by demographics

For many students, the impact on their mental health is exacerbated by multiple, intersecting factors, and those from marginalised communities see their mental health suffer to a greater extent. With research showing that individuals from low-income backgrounds, LGBT+ individuals, and minoritised racial and ethnic groups are more susceptible to poorer mental health than others due to personal, social, and environmental factors, the disparities in mental health outcomes between certain groups and the wider student population are unsurprising[5].

Students who were already vulnerable report being left exposed to additional, insurmountable pressures due to the cost of living. Disabled students, students with caring responsibilities, and care-experienced or estranged students are significantly less likely to be concerned about the cost of living crisis (Figure 5). However, these students are also all significantly more likely to go without food or necessities because they could not afford them; not be confident that they had enough money to cover their basic cost of living; or to consider dropping out or deferring university because they could not afford to continue. For these students, concerns regarding being able to financially cope at university are not new, however it is clear the cost of living crisis has exacerbated negative impacts regarding their academic studies, their health, and their social wellbeing.

Postgraduate research students are another group which is being disproportionately impacted by the crisis, with 77% (N = 1954/2550) agreeing that their mental health had been impacted, significantly higher than Undergraduate students ($p = < 0.05$). Postgraduate research students expressed discontent due to inadequate stipend provision, no financial support for write up periods, and the lack of consideration or adequate provision given to funding for postgraduate research students with children, all of which led to high levels of stress, anxiety and financial insecurity for this group of students.

"The entirety of ***last year was like living in a pressure cooker with the heat turned up each month,*** *I feel like I've lost a year of my PhD simply due to worrying about costs."*

"I am also not able to save for the future, including buying a house or starting a family. In many ways ***it feels like my life is on hold until after the PhD,*** *which has a large impact on my mental health and wellbeing."*

"The increased cost of living (especially sky rocking prices of single rooms in London) caused me to have to choose between a daily very long trajectory to university or having a few meters square single room. This causes a big strain on PhD students mental health, as ***we are expected to carry a heavy workload whilst enduring a hard living condition and not being able to do activities that cost money."***

"I dare you to live off this stipend *for just 3 months.* ***You will see that it's not really living."***

"I was thinking a lot to drop the program and go back to my country because ***the circumstances here are unbelievably terrible.*** *I am a mother with 2 dependants (with a husband and a child) ...* ***I was crying the whole nights and could not focus at all to read and study and do the assignments.*** *So, my academic situation is not going well at all. I'm really worried. When I go by trains, I see homeless people sitting in the stations and I'm afraid I would be just like them one day."*

Postgraduate research students also spoke about the lack of hardship and financial assistance available to them. They feel that, whilst institutions and organisations may be aware of the particular issues facing postgraduate research students, this has not been met with "appropriate action": "I noticed that all individuals and organizations understand the cost of living crisis for PhD students, but what we actually need is appropriate action - increase of stipend, support (canteen food, healthcare etc)."

As well as expressing anxiety about the present, it is clear that the cost of living crisis has exacerbated anxiety regarding the future, particularly the graduate job market and debt from university. 43% of respondents (N = 5587, weighted) regularly worry about their student loan repayments. One student spoke about the intersection between their mental health and their fears for life as a graduate: "My mental health has certainly been impacted, as I worry about getting a suitable job when I graduate, with enough money to be able to afford rising rent costs, skyrocketing bills and ridiculous food costs." These comments often align with students worrying about the future and thinking about dropping out of their course.

The top four groups who reported regularly worrying about their student loan repayments were:

- **Students whose parents have no qualifications** (55%, N = 215/388)
- **Students whose household income was below £25,000** (49%, N = 827/1674)
- **Disabled students** (49%, N = 445/906)
- **Students who are estranged or care-experienced** (47%, N = 163/346)

Each of these groups were statistically more likely to experience worry about their student loan repayments than their peers.

Although students on an SFE loan will not begin making repayments until they are earning above the current threshold (£27,295 as of January 2023), its looming presence for students is clear. One student stated that it is having an explicit impact on their mental health: “As a healthcare student it’s really hard. I’m left to question if I want to continue my studies as it’s getting harder to pay for all the bills and necessities. Even thinking about the huge amount of debt I’ll be in after I’ve graduated is having an impact on my mental health. I’m sure that other healthcare students feel the same too.” Another student commented that concerns regarding loan repayments is causing them to consider whether their degree is worth it:

“On top of an already stressful degree (medicine), it is added stress thinking about loan repayments and, considering how long it is, I have thought about dropping out many times.”

Where students are being shielded from the full financial impacts of the crisis, they are often relying on family, partners, friends and savings, or living at home to reduce costs, which in turn is impacting on their mental health. Feelings of guilt and shame are persistent throughout qualitative comments, with students’ families also struggling to meet rising costs. Speaking about their parent’s sacrifice, one student expressed their upset that their parents are “forgoing essentials like heating so that [I] can afford to study here.” Another student said, “My parents are spending twice the amount to send money from my home country. Seeing my parents worrying about money is affecting my mental health too. The money they send me is enough generally but this year it’s seeming too less.” This further exacerbates anxiety about the future and graduate job prospects; students are concerned that they will have to continue to rely on family for support, and are anxious to obtain a salary sufficient to allow them to repay those who have been supporting them.

4 in 5 students whose parents have no educational qualifications would not be able to cover the cost of an emergency

Only 35% of students with caring responsibilities are confident that they have enough money to cover their basic cost of living

67% of disabled students agree that their academic performance has suffered due to the crisis

"I am very lucky to come from a household that is financially well off and to have parental support but ***despite my parents being high earners I have felt almost constant anxiety about running out of money.*** *My rent alone is £300 more than my student loan a month, aside from bills and transport. I am forced to rely on parental support which I would rather not have to do seeing as I work 12 hours a week and used to be able to live relatively comfortably with the odd £100 here and there taken from my parents.* ***I cannot begin to imagine how stressful this situation must be for students from lower socioeconomic backgrounds or those who have to provide for their families.*** *Students are not eligible for most of the support payments from the government, so I wonder how people are coping. It is truly horrible."*

Impact on Social Wellbeing

"Loneliness prevails and the fear of missing out is intense"

Over half (55%) of students have stopped taking part in extra-curricular activities because they cannot afford to

The cost of living crisis is having a significant impact on students' social wellbeing: their ability to build and maintain healthy relationships and have meaningful interactions with those around them. 73% (N = 5589, weighted) of students have reduced the amount of socialising they do and 55% (N = 5590, weighted) have stopped taking part in extra-curricular activities (e.g., societies and clubs) because they cannot afford to.

Having a strong sense of belonging and community at university has been linked to better academic outcomes and improved mental health . Having strong student communities and extra-curricular opportunities is essential for equipping students with soft skills and experiences that will aid them in their future careers. Societies and clubs (often supported by Students' Unions) are one of the most common ways for students to develop friendships, build their support networks, take on leadership roles, learn new skills and socialise. However, the most vulnerable students responding to our survey, and those who likely benefit the most from extra-curricular activities, are the ones who are more likely to stop engaging in them due to the cost.

*"**I'm scared that I won't be able to afford food as I'll be struggling to afford the roof over my head.** My mental health has gotten very bad because of this and **I'm struggling to find a work/life/study balance** but I need the money. I am unable to participate in clubs and socialise.*

The top five groups who reported having stopped taking part in extra-curricular activities (e.g., societies and clubs) because they cannot afford to were:

- **Students whose parents have no qualifications** (70%, N = 273/389)
- **Students whose household income was below £25,000** (70%, N = 1173/1678)
- **Black students** (68%, N = 115/170)
- **International students** (65%, N = 1139/1748)
- **Disabled students** (63%, N = 573/906)

Each of these groups were statistically more likely to have stopped taking part in extra-curricular activities because they cannot afford to.

Students from households with the lowest household income are almost twice as likely to stop engaging with extra-curricular activities than those with the highest (Figure 6). Whether it is joining fees for societies, the cost of travel to events, avoiding socialising in settings that involve purchasing food or drink, or simply the fact that any socialising or extra-curricular activity – free or not – takes away time that students could be undertaking paid work, students are not able to justify the expense of these opportunities whilst struggling to afford necessities such as food and rent.

"I have been unable to join any clubs or societies which has left me feeling isolated. I have had to take on more hours of work despite my illness to make ends meet, and have very little time to do anything for myself."

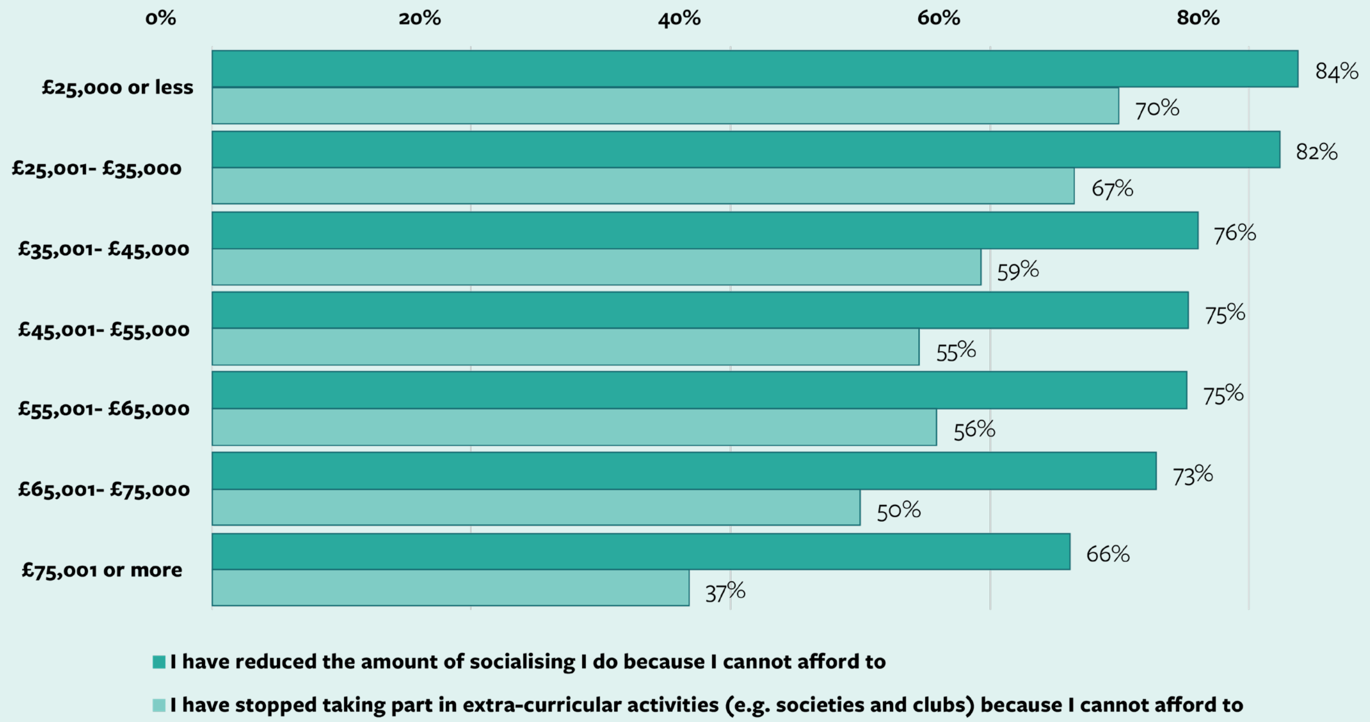


Figure 6: Grouped bar graph showing percentage of respondents who have reduced socialising or stopped taking part in extra-curricular activities by household income (GDP/annum)

"The money I have received from student loans/bursaries hasn't even been enough to pay my rent so I've had to get 2 jobs to be able to support this. My parents are struggling themselves so can't help finically. ***I've had to eat very little food in a week to save money, not joined clubs/ ocieties that I would've wanted to and only been out once or twice because I can't afford to.*** *Having 2 jobs has obviously affected my studies and t****he constant worry about being able to finically survive has hugely effected my mental health to the point of nearly dropping out multiple times."***

"It is always difficult to work part-time and study for assessments. There are situations where you can't ask your parents for money so you would have to stop socialising and not attend parties or avoid a take out. ***You're only studying and not engaging in any relaxing activities which made me more anxious and sad."***

Students report having to choose between food, heating and socialising/seeing friends, "a night out has been swapped for a day of heating", with the students finding that their "relationships have suffered" as a result. Social activity is often the first thing that students cut back on. Feelings that they "cannot justify the time and expense" featured commonly in the 198 comments on the impact to their social wellbeing that the cost of living crisis has had. For students who have been able to increase their part-time working hours, whilst they have been able to afford necessities, they have drastically reduced the amount of 'free time' they have. One student told us that they "have given up extracurricular activities to work part-time", with another saying that they "have had to work more hours meaning [they] cannot socialise".

With students socialising less, there is a concern that the cost of living crisis will further deepen the student loneliness epidemic. In 2022 23% of students felt lonely 'most' or 'all of the time'[7]. If students continue to cut back on seeing their friends due to fears of the cost then this figure is likely to increase significantly. One student stated that, due to the cost of living crisis, "I socialise less and ultimately feel more alone". After two years of online and hybrid teaching due to the Covid-19 pandemic, this year was supposed to be a return to normal. However students are unable to socialise how they want to, or sometimes at all, unable to afford to join campus clubs and societies and unable to maintain healthy relationships.

The top five groups who reported having reduced the amount of socialising they do because they cannot afford to were:

- **Students whose parents do not have qualifications** (86%, N = 333/389)
- **Students whose household income was below £25,000** (84%, N = 1403/1675)
- **Students from 'other ethnic backgrounds'** (82%, N = 287/348)
- **Postgraduate taught students** (82%, N = 1253/1529)
- **International students** (81%, N = 1415/1748)

Each of these groups were statistically more likely to have reduced the amount of socialising they do because they cannot afford to.

"My student life here is non existent because I cannot afford to go to society events, *which makes it generally hard to make friends and socialise with people."*

"The biggest impact has been on my social activities. ***The cost of living crisis comes up in conversation most days with my fellow PhD students.*** *I've stopped going out in the evenings with many people, although there are some more well-off students still go out, which can make me feel left out sometimes."*

"I want to do many things other students are doing but most things require money. *I need to take into account how much I'll have by the end and so, I'm normally unable to join them.* ***It is horrible."***

"It is the inability to have balance of living and enjoying everyday life, without considering if I will have enough money to cover me *if I want to do something different, or go out somewhere extra or explore."*

Support

The impact of the cost of living crisis is significant for students, with a variety of factors resulting in them being a group in society particularly vulnerable to financial insecurity. Many are unable to increase their earning potential to meet rapidly rising prices due to academic demands of their studies or due to explicit work restrictions (i.e. for international students), the support respondents already receive has not risen in line with inflation (i.e. student maintenance loans), and students are often not eligible for additional benefits or cost of living related government support.
Respondents commonly report feeling that support from universities and the government is inadequate, non-existent or inaccessible. When support is available there is often low awareness levels amongst students, and many do not access or face difficulties accessing support when they do know about it due to inaccessible procedures. When support is available and students are able to access it, respondents commonly noted that the support is vastly insufficient to offset the financial pressure they are facing.

Just 36% (N = 5590, weighted) of all students agreed that if they needed advice or help regarding money and finance, they would know how to access this. Nearly half (N = 2916/5927) of all students said they were not aware of their universities or Students' Unions hardship funds, the main source of financial support currently available to students. Students raised the issue of a lack of effective outreach and communication from universities regarding financial support, with one student commenting that "the lack of communication is appalling" and another raising the issue of university support being "inefficient and closed during holidays".

For particular groups of students existing funding is not, or was not perceived to be, accessible to them. For example, one student parent commented "none of the resources I see circulated by the University take into account the extra financial pressures faced by student parents", and another stated that mature students will "probably be less likely to know or have the confidence to ask for help". One part time student commented that "the University I attend only cares about full-time students and so I don't feel included in anything, or that there is the necessary help and support for those who do not fit into the 'norm' of students".

International students feel that support from universities regarding the crisis is not accessible to them. One stated that "there are not enough University resources, especially for international students", while another felt that "the financial aid that the university provides is exclusive and limited to local UK students". Many university hardship funds are accessible only to home students, have separate pots for international students with more limited resources, or only consider applications from international students in exceptional circumstances.

Even when students are aware of support that they are eligible to apply for, there are a range of barriers that mean the support is often inaccessible. While 49% (N = 2916/5927) are aware of university hardship funds existing, just 1 in 10 (N = 459/4209) said they had applied for them. Generally, students perceive that the application process is highly invasive and time consuming. This puts some students off applying altogether; one said "the process is so long and takes time and is still not a guarantee. I don't have time for this" and so instead decided to "spend this time looking for more work or other sources of income". Another "filled the form halfway and then quit because of stupid expectations", and a third described it as "an incredibly invasive application process". Students in great financial need also report being unsuccessful when they do make applications or having to re-apply consistently. One student reported that they have been homeless since September 2022 and said that they "felt as though the university has not helped me where I have explicitly begged for help". Another described "a 4 month long struggle with the university to even get any help".

"To access grants and schemes they always ask me how much my parents earn. I don't understand this logic. ***I am over 18 and supposed to be paying my parents for rent now but I can't even afford to buy my own things and cover uni travel costs without asking them for some money which isn't fair.*** *I only receive 500 in bursaries per year and it's very hard.Due to religious reasons I only took one initial student maintenance loan and then stopped because I cannot afford to take any more as I am not certain if I can pay it back despite working on the weekends. I'm also actively trying to get more work but it's hard and I don't know what to do."*

"You ask about hardship funds but we can't access those as easily as domestic and funded students can. ***Do I have money? Yes. Is it an insurmountable mountain of debt? Also yes.*** *Is this fair that some students are getting multiple stipends? Of course not. Does anyone care? No. So...this [cost of living] crisis has just made unfunded students more resentful of the [university], funded students, and the wealthy."*

"[My university] have a financial hardship fund that is meant to be accessible to all students. However they only will provide a maximum of £2,500 after an incredibly invasive application process. ***The process includes handing over a year's worth of bank statements and explaining any transaction over £200.*** *The most frustrating part is that after I applied, I was turned down. Their feedback was that, as an American student I could simply take out more loans... This is not helpful at all and incredibly frustrating. I do not want to put myself in more debt just to get an education that I am already in debt paying for.* ***It has been incredibly hard to continue my PhD. I am writing this in a room that is 10 degrees as I cannot afford to heat my flat. It is exhausting, it is frustrating, and most of all it is demeaning."***

University hardship funding is designed to cover unexpected financial shortfalls. However, the cost of living crisis is systemic and even if hardship funding was significantly increased and the process improved it would be unlikely to present a comprehensive solution given the extent of financial pressure respondents are experiencing.

In open comments, students expressed that government support is needed, and currently falling short. There is a widespread perception that "no government provision has been offered to students through the cost of living crisis" with students criticising a "lack of governmental coherence" and a "lack of leadership and guidance from the Government". Many commented on the fact that student loans have not increased in line with inflation, leading to the perception that "no adjustments are made to factor in cost of living by student finance", and there were also calls for Student Finance England to "reconsider the maintenance grant" allowance. The 20 hour working limit on international students' visas also contributes to hardship within these groups, limits the potential of students being able to increase income to meet rising costs, and this is another area where students feel the government should intervene.

Methodology

The survey was open from Monday 9th January to Monday 20th February 2023. 14 Students' Unions participated. It was promoted via Students' Unions to their respective student populations. The overall response rate was 8800 and these respondents were self-selecting. The results were weighted by London vs non-London respondents.

Demographics

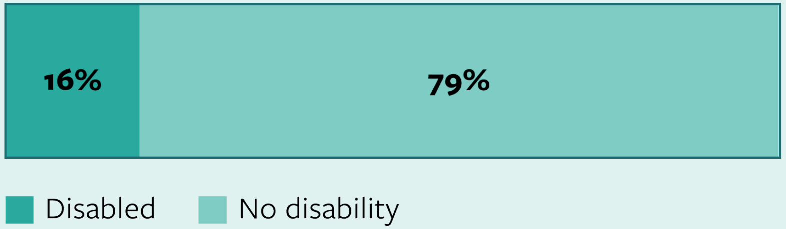
All: N = 8800
Gender: 66% women (including trans women) | 29% men (including trans men) | 2% non-binary | 1% prefer to self-describe | 2% prefer not to say
Level of study: 54% undergraduate | 28% postgraduate taught | 18% postgraduate research
Fee status: 59% home/ UK students | 10% EU students | 32% International students
Ethnicity: 30% Asian | 3% Black | 5% Mixed | 9% 'Other*' | 53% White
Disability: 16% disabled | 79% no-disability | 5% prefer not to say
*Other includes Arab, Hispanic/ Latino/ Latinx, Irish Traveller, Romani or Traveller, and ethnic background not listed

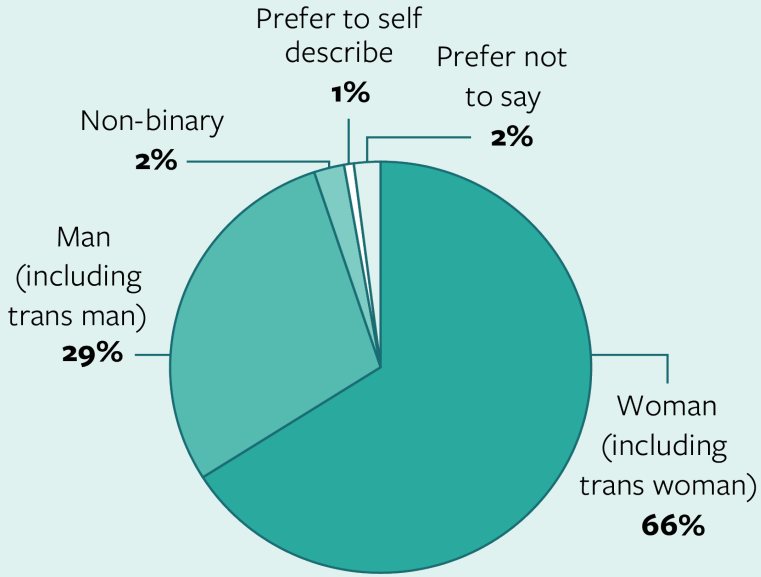
About the authors

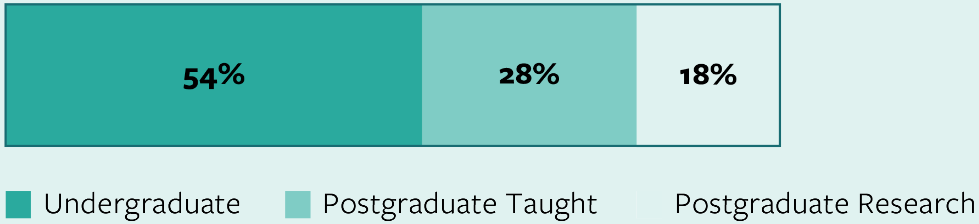
This study was commissioned by Russell Group Students' Unions and carried out by Dani Bradford, Policy and Research Manager, Meg Haskins, Policy and Research Coordinator, Jake Simms, Policy and Research Coordinator, and Carol Paige, Policy and Research Coordinator, within Students' Union UCL's Policy and Research department.

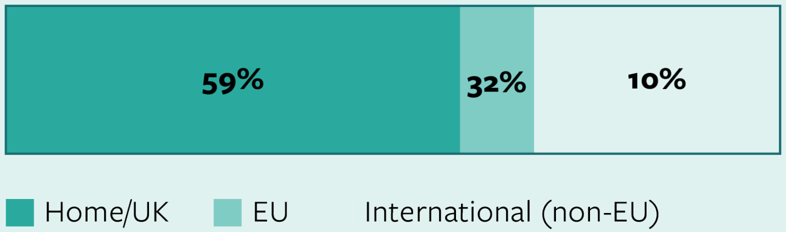
Queries regarding this research should be directed to hello@rgsu.co.uk

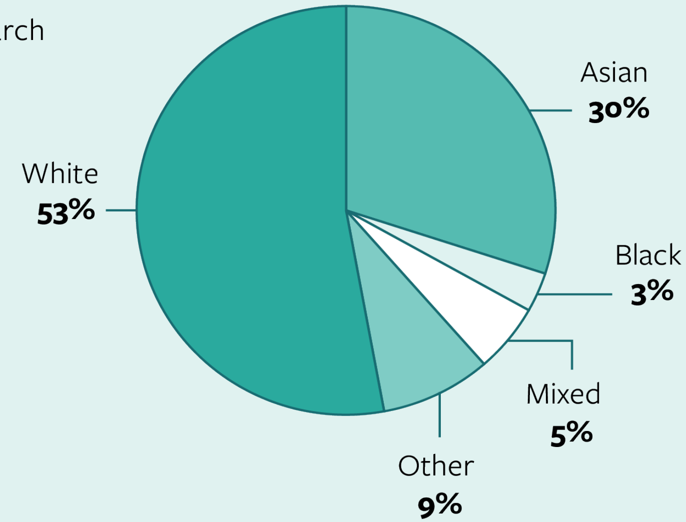
Demographics











Footnotes

[1] Savethestudent (2023) Revealed: The universities where students pay the most rent, Save the Student. Available at: https://www.savethestudent.org/accommodation/universities-students-pay-the-most-rent.html (Accessed: March 2, 2023).

[2] Poverty definitions and Thresholds (2020) Trust for London. Available at: https://www.trustforlondon.org.uk/data/poverty-thresholds/ (Accessed: March 2, 2023).

[3] Ibid.

[4] Zero-hours contracts: Evolution and current status (2022). CIPD.

[5] Advancing mental health equalities strategy (2020). NHS England. Available at: https://www.england.nhs.uk/publication/advancing-mental-health-equalities-strategy/ (Accessed: March 8, 2023).

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[7] Student academic experience survey - HEPI (2022). Available at: https://www.hepi.ac.uk/wp-content/uploads/2022/06/2022-Student-Academic-Experience-Survey.pdf

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #424

COMPLETE

Started:	Monday, March 27, 2023 7:46:38 PM
Last Modified:	Monday, March 27, 2023 7:48:44 PM
Time Spent:	00:02:06
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY 459 responses

Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.1 Policy SS1: Delivering Sustainable Growth for York

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See representation in attached document

Modification Ref: **MM3.1; MM3.2; MM3.4; MM3.5; and MM5.4**

Representation on behalf Galtres Garden Village Development Company

(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is ***SID 620)***

1 We object to the proposed modifications.

2 Modification 3.1 states that the plan period is 2017-2032/33 and that to ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet development needs for a further minimum period of 5 years to 2038. It further states that the plan will deliver a minimum average annual net provision of 822 dwellings over the plan period.

3 We object to this modification on several grounds.

Plan Period

(i) What is the Plan period? Already 7 years of the plan period have elapsed, and the six largest strategic allocations have yet to deliver a single dwelling. Indeed, the Trajectory presented in Table 1 of Housing Trajectory Note EX/CYC/107/1 (August 2022) indicates that the two largest allocation ST14 and ST15 will not deliver their first completions until 2021/26 and 2027/28 respectively. However, even those anticipated first completions are overly optimistic. Our revised trajectory for sites H1a&b; ST4; ST5; ST8; ST14; ST31 and ST33 is set out in Table 1 below and the full trajectory presented at Appendix 1 of this representation. What our adjusted trajectory demonstrates is considerable slippage in housing delivery. With 7 years of the 16-year plan gone, the plan is, de-facto a 9-year plan. Even including the additional 5 years for Green Belt would make it a 14-year plan, well short of the 15-year plan period recommended in paragraph 157 of the NPPF (2012). Put simply, the Plan will not meet the development needs of the City and in this respect it is fundamentally unsound.

(ii) Through the Plan preparation we have argued in our representations that what the Plan requires is additional housing allocations to increase the

number of outlets that could deliver housing so that in event some sites were delayed, as is proving to be the case, the trajectory could be maintained. For example, the Council's trajectory is anticipating 1,199 completions in 2025/25. Our revised trajectory demonstrates that is more likely to be 797 units. That is primarily because site H1a&b is unlikely to deliver 215 completions in 2024/25 given that construction has not yet started. That takes 215 units out of completions for that year.

(iii) It is quite extraordinary that **8 years** into the Plan period in 2025/26 the trajectory is anticipating an 'in year' undersupply of 88 dwellings and a cumulative **undersupply** of 360 dwellings. What this demonstrates is the Plan Spatial strategy and the allocations that flow from it simply will not deliver the housing needs of the City.

4 We have consistently maintained in our representations that the trajectory was always ambitious, but Table 1 of EX/CYC/107/1 proves that. When compared to the Trajectory presented at the examination in March 2022 (which has a base date of 2021) the delivery of some sites has moved significantly. Some examples are given in table 1 below. What this table demonstrates is that the delivery of some sites which lie at the heart of housing delivery and, affordable housing delivery in particular, has slipped significantly. For example, first delivery of dwellings on the largest site ST15, will not happen until 2027/28 - **10 years after the start date of the Plan!**

5 This calls into question the credibility the Local plan strategy.

O'Neill ASSOCIATES

Table 1

	First completions anticipated			
SIte	**EX/CYC/69 base date 1 April 2021**	**Appendix 1 of EX/CYC/79 Appendix 1 Housing trajectory base date 1 April 2022 (Supersedes EX/CYC/69)**	**Our amendments to Appendix of EX/CYC/79**	**Comments**
H1a&b	2023/24	2024/25	2025/26	Planning permission but no construction has started.
ST4	2023/24	2024/25	2025/26	Application submitted but not determined.
ST5	2023/24	2024/25	2025/26	
ST7	2024/25	2025/26	2026/27	No Application submitted
ST8	2022/23	2023/24	2024/25	Outline PP granted but no reserved matters submitted.
ST14	2023/24	2025/26	2026/27	No Application Submitted.
ST31	2023/24	2023/24	2024/25	Application submitted but not determined.
ST33	2023/24	2023/24	2024/25	Application submitted but not determined.

6 We believe our estimates of revised delivery trajectory is reasonable based on our experience of similar schemes and the Council's assumptions on delivery set out in paragraph 2.11of EX/CYC/76a. These (conservative) changes alone remove 460 dwellings that the Council were anticipating would be completed in 2022/22 – 2026/27 and push 379 dwelling that should have been completed on sites ST5, ST8 and ST14 in the Plan period the 5year beyond the plan period.

7 In many respects many of the elements of housing supply such as windfall aan student housing that the Council have includes will not address the 3 keys issues we identified in our representations:

- The shortage of housing
- The shortage of affordable housing
- The shortage of purpose built housing for an older population

8 These needs can only be addressed by strategic allocations. But most of the strategic allocations will not deliver housing for another 3-4 years - almost 10 years into the plan period!

Safeguarded Land

9 Proposed modification MM3.1 states:

> *"To ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet a further, minimum, period of 5 years to 2038."*

10 The evidence we have submitted at the various stages of the Local plan Consultation and to the examination demonstrates the Plan does not provide sufficient land to ensure Green Belt permanence. Leaving aside the question of additional allocations, an obvious way to address the issue of permanence would have been to identify safeguarded land which would have met the NPPF requirement of providing for the development needs well beyond the Plan period.

11 The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.

12 As already stated, the Green Belt boundaries around York are being <u>defined</u> (or established) for the first time. They are not being <u>altered.</u> The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.

13 Critically, the Council must demonstrate to the Local Plan Inspector that the Green Belt boundaries will not have to be altered at the end of the plan period. As our previous evidence has demonstrated, the Draft Plan has not allocated adequate land to meet housing needs within the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.

14 As we pointed out in our representations the 2019 Modifications exactly what constitutes "…well beyond…" the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015 and by the advice obtained from John Hobson QC who advised the Council that in his opinion a 10 year horizon beyond the life of the Plan would be appropriate. His opinion concluded by advising the Council that:

> "….*if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer-term needs could be met without encroaching into the Green Belt and eroding its boundaries*"

15 Having received this advice, offices recommended to the January 2015 Local Plan Working Group that safeguarded land designations be included in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.

16 The omission of this key component of safeguarded land from the Local Plan spatial strategy results in the Plan being fundamentally unsound, particularly as the Plan period is only up to 2033 and from the point of anticipated adoption in 2023 it will only be a 9-year plan with land identified for development needs for a further 5 years. This would give a Green Belt Boundary of 14 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs 10 years beyond.

Unmet need for Family housing

17 When it comes to the type of housing most needed in the City both the 2016 SHMA (SD051 and SD052) and the more recent analysis in the *Local Housing Needs Assessment* by Iceni (EX_CYC_92) confirm the majority of new units (up to 80%) should be 2 and 3 bedroom houses rather than flats, although consideration will

need to be given to site specific circumstances (which may in some cases lend themselves to flatted development). Additionally, the Council should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.

18 Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay. In addition the Iceni analysis finds that the proportion of households with dependent children in York is fairly low with around 25% of all households containing dependent children in 2011 (compared with regional and national averages of 29%).

19 However, this finding is not surprising given that significant shortfall in housing completions since 2011 coupled with the high level of communal establishments and student accommodation include included as part of the total completions. We have addressed this issue extensively in our representations over the years and in our submission to Phase 2 Matter 2 of the Examination (Housing Need and Requirement). Our evidence, based on the Council's annual monitoring reports[1] and the Council's housing trajectory identifies the shortfall in family housing in to be 2,605 dwellings (see table 2).

Table 2
Shortfall in family housing 2012/13- 2021/22

A	Requirement (790 x 10)	7,900
B	Completions	7,013
C	Shortfall (A-B)	887
D	Student accommodation and communal establishments included in completions	1,718
E	Potential shortfall in family housing (D+E)	**2,605**

20 So, in many respects the finding by Iceni of a smaller proportion of households with dependent children in the population can be explain in large part be explained by the shortfall in housing provision generally and the shortfall in family dwellings in particular.

[1] As summarised in Table X on page 6 of our paper presented on Matter 2 of the Phase 2 hearings.

21 This points to the need to include within the Plan even greater provision for sites that can deliver family housing, to redress this imbalance.

22 We have maintained through our representations, that the housing requirement figure is too low and, consequently, the level of house allocations it informs will not maintain a sufficient or steady supply of housing to meet the City's needs.

Affordable Housing

23 One of the more serious consequences of the slippage in the housing trajectory is the consequential slippage in the provision of affordable housing. Both the 2016 SHMA (SD051 and SD052) and the more recent *Local Housing Needs Assessment* by Iceni (EX_CYC_92) highlight the pressing need for affordable housing. Paragraph 4.61 of the Iceni assessment notes that "…the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the City".

24 The Iceni analysis suggests a need for 592 affordable homes per annum across the City an additional need across the City for 467 Affordable Housing Ownership (AHO) units per annum. However, additional supply from resales of market homes (below a lower quartile price) could reduce the need for AHO. Regardless, the need for affordable housing is significant.

25 One of the bullet points in modified policy SS1 (MM3.1) states:

> *Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*

26 This would mean the Local plan delivering 4,228 affordable dwellings in the Plan period.

27 The Council's Affordable Housing Note EX/CYC/107/2 (August 2022) indicates a total delivery of 3,255 affordable dwellings in the plan period. We estimate that at best delivery will be 3,046, allowing for slippage in the trajectory of Sites ST5, ST7, ST8 and ST14. In addition, we believe the Council has double counted site H56, Land at Hull Road. That site was completed in 2021/22 so would have been included in the figures for completions between 2017 and 2022. That reduces the completions in Table 2 of Appendix 1 of EX/CYC/107/2 to 2,151.

Table 3 – Affordable Dwellings Delivery 2017/18-2032/33

	Councils Figures*	**Galtres Adjusted**
Sites with Extant Permission	223	223
Completions Apr 2017-Apr2022	612	612
Council dleivery progam	60	60
Local Plan Allocations	2360	2151
	3,255	**3,046**

*** Appendix 1 of EX_CYC_107-2**

28 The annual average affordable delivery is therefore 190 dwellings per annum (3046÷16), compared with a need for 592 affordable homes (excluding AHO). This is an extremely low rate of affordable provision against the identified need. In addition, as we highlighted in our submission to Matter 1 of the Phase 3 hearings of the Examination (affordable housing), the existing stock of affordable housing in the City is being reduced annually by right to buy sales. In the 4 years 2017/18 to 2020/21, right to buy sales averaged 59 units per annum (Table 2 of our submission to Matter 1 Phase 3). If this rate were to be maintained over the Plan period, the annual addition of 190 affordable dwellings would be reduced to a net annual addition of 131 affordable dwellings.

29 The Council state thst their aspiration of trying to achieve 45% of the identified affordable housing need would require an additional 88 affordable houses per annum to be delivered over the remainder of the Plan period (paragraph 11 of EX/CYC/107/2. Based on our estimates of affordable housing delivery the figures would be 107 units per annum ((4,228 – 3046) ÷ 11)) There is no evidence whatsoever to demonstrate that this is achievable.

30 Consequently, the objective to realise 2,360 affordable homes through the operation of these policies cannot realised. Changes to the wording of paragraph 3.3 (MM3.5) are therefore proposed.

31 For the reasons set out in our submission to Matter 1 Phase 3 the significant need for affordable housing alone points to a need for additional housing provision and additional allocations.

SUGGESTED CHANGES TO THE PLAN

(i) Policy SS1 (MM3.1)

The plan will not ensure permanence of the Green Belt boundaries beyond the Plan period, because, de facto, there will only be 9 years of the Plan period left assuming the Plan is adopted in late 2023. In other words, the 5 years beyond the Plan period have become part of the Plan period. This shortfall could be remedied by identifying safeguarded land that could be brought forward in the event there is a shortfall in housing provision at the first review of the Plan. The Inspectors have evidence before them of omission sites, such as Galtres (Site ref: 964) that were considered suitable for allocation, that could be identified as safeguarded land.

The following sentence to be added at the end of the first paragraph of MM3.1

"In addition safeguarded land is identified to ensure that any deficiency in housing supply arising at review of the Plan can be rectified"

(ii) Policy SS1 (MM3.1)

The minimum annual average annual net provision of 822 dwellings per annum in bullet point of MM3.1 should be replaced with a figure of 1,026. In our previous representations at the various stages of the Local Plan and in our submissions the Examination we have present out case for an uplift to the housing requirement of 1,026 dwellings per annum. (Our representations on the proposed Modification in 2021 set out our evidence).

We have made the case in our previous representations on the Local Plan for the allocation of additional land (Galtres Garden Village) (Site Ref.)to address this uplift in the housing requirement but the modifications do not accommodate further discussion on this point.

(iii) Bullet point 4 of MM3.1 should be deleted

~~*Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*~~

(iv) Policy SS1 explanation paragraph 3.3 (MM3.5) suggested revised wording

Policies H7 and H10 set out the Plan's policy approach to this, and ~~at least~~ 2,360 affordable homes ~~are expected to~~ could be delivered within the plan period through the operation of these policies. Combined with recorded completions (to 1st April 2022), other sources of forecast supply on windfall sites and known provision secured through the Council's Housing Delivery Programme, it is estimated that around ~~3,265~~ 3,046 affordable homes could ~~will~~ be delivered in the plan period.

~~To help increase the proportion of need being met to more than 35%, the Council has set a target of providing at least 45% of its affordable housing need. Through its annual monitoring (in accordance with the delivery and monitoring framework at table 15.2), the Council will review progress on meeting the target and take appropriate action and intervention should delivery rates fall short. e market.~~

(v) Figure 5.1 – modification MM5.4

Because of the changes we have outlined to the Housing trajectory in Appendix 1, consequential changes will have to be made to the graph at Figure 5.1 of the Plan.

APPENDIX 1

Revised Housing Trajectory

(Our changes to Site trajectories are highlighted in Green)

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

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

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #427

COMPLETE

Started:	Monday, March 27, 2023 7:48:44 PM
Last Modified:	Monday, March 27, 2023 7:50:24 PM
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IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.3 Key Diagram

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See attached representation

O'Neill ASSOCIATES
Chartered Town Planning Consultants

Modification Ref: **MM3.1; MM3.2; MM3.4; MM3.5; and MM5.4**

Representation on behalf Galtres Garden Village Development Company

(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is ***SID 620)***

1 We object to the proposed modifications.

2 Modification 3.1 states that the plan period is 2017-2032/33 and that to ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet development needs for a further minimum period of 5 years to 2038. It further states that the plan will deliver a minimum average annual net provision of 822 dwellings over the plan period.

3 We object to this modification on several grounds.

Plan Period

(i) What is the Plan period? Already 7 years of the plan period have elapsed, and the six largest strategic allocations have yet to deliver a single dwelling. Indeed, the Trajectory presented in Table 1 of Housing Trajectory Note EX/CYC/107/1 (August 2022) indicates that the two largest allocation ST14 and ST15 will not deliver their first completions until 2021/26 and 2027/28 respectively. However, even those anticipated first completions are overly optimistic. Our revised trajectory for sites H1a&b; ST4; ST5; ST8; ST14; ST31 and ST33 is set out in Table 1 below and the full trajectory presented at Appendix 1 of this representation. What our adjusted trajectory demonstrates is considerable slippage in housing delivery. With 7 years of the 16-year plan gone, the plan is, de-facto a 9-year plan. Even including the additional 5 years for Green Belt would make it a 14-year plan, well short of the 15-year plan period recommended in paragraph 157 of the NPPF (2012). Put simply, the Plan will not meet the development needs of the City and in this respect it is fundamentally unsound.

(ii) Through the Plan preparation we have argued in our representations that what the Plan requires is additional housing allocations to increase the

number of outlets that could deliver housing so that in event some sites were delayed, as is proving to be the case, the trajectory could be maintained. For example, the Council's trajectory is anticipating 1,199 completions in 2025/25. Our revised trajectory demonstrates that is more likely to be 797 units. That is primarily because site H1a&b is unlikely to deliver 215 completions in 2024/25 given that construction has not yet started. That takes 215 units out of completions for that year.

(iii) It is quite extraordinary that **8 years** into the Plan period in 2025/26 the trajectory is anticipating an 'in year' undersupply of 88 dwellings and a cumulative **undersupply** of 360 dwellings. What this demonstrates is the Plan Spatial strategy and the allocations that flow from it simply will not deliver the housing needs of the City.

4 We have consistently maintained in our representations that the trajectory was always ambitious, but Table 1 of EX/CYC/107/1 proves that. When compared to the Trajectory presented at the examination in March 2022 (which has a base date of 2021) the delivery of some sites has moved significantly. Some examples are given in table 1 below. What this table demonstrates is that the delivery of some sites which lie at the heart of housing delivery and, affordable housing delivery in particular, has slipped significantly. For example, first delivery of dwellings on the largest site ST15, will not happen until 2027/28 - **10 years after the start date of the Plan!**

5 This calls into question the credibility the Local plan strategy.

Table 1

	First completions anticipated			
SIte	**EX/CYC/69 base date 1 April 2021**	**Appendix 1 of EX/CYC/79 Appendix 1 Housing trajectory base date 1 April 2022 (Supersedes EX/CYC/69)**	**Our amendments to Appendix of EX/CYC/79**	**Comments**
H1a&b	2023/24	2024/25	2025/26	Planning permission but no construction has started.
ST4	2023/24	2024/25	2025/26	Application submitted but not determined.
ST5	2023/24	2024/25	2025/26	
ST7	2024/25	2025/26	2026/27	No Application submitted
ST8	2022/23	2023/24	2024/25	Outline PP granted but no reserved matters submitted.
ST14	2023/24	2025/26	2026/27	No Application Submitted.
ST31	2023/24	2023/24	2024/25	Application submitted but not determined.
ST33	2023/24	2023/24	2024/25	Application submitted but not determined.

6 We believe our estimates of revised delivery trajectory is reasonable based on our experience of similar schemes and the Council's assumptions on delivery set out in paragraph 2.11of EX/CYC/76a. These (conservative) changes alone remove 460 dwellings that the Council were anticipating would be completed in 2022/22 – 2026/27 and push 379 dwelling that should have been completed on sites ST5, ST8 and ST14 in the Plan period the 5year beyond the plan period.

7 In many respects many of the elements of housing supply such as windfall aan student housing that the Council have includes will not address the 3 keys issues we identified in our representations:

- The shortage of housing
- The shortage of affordable housing
- The shortage of purpose built housing for an older population

8 These needs can only be addressed by strategic allocations. But most of the strategic allocations will not deliver housing for another 3-4 years - almost 10 years into the plan period!

Safeguarded Land

9 Proposed modification MM3.1 states:

> *"To ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet a further, minimum, period of 5 years to 2038."*

10 The evidence we have submitted at the various stages of the Local plan Consultation and to the examination demonstrates the Plan does not provide sufficient land to ensure Green Belt permanence. Leaving aside the question of additional allocations, an obvious way to address the issue of permanence would have been to identify safeguarded land which would have met the NPPF requirement of providing for the development needs well beyond the Plan period.

11 The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.

12 As already stated, the Green Belt boundaries around York are being <u>defined</u> (or established) for the first time. They are not being <u>altered.</u> The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.

13 Critically, the Council must demonstrate to the Local Plan Inspector that the Green Belt boundaries will not have to be altered at the end of the plan period. As our previous evidence has demonstrated, the Draft Plan has not allocated adequate land to meet housing needs within the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.

14 As we pointed out in our representations the 2019 Modifications exactly what constitutes "…well beyond…" the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015 and by the advice obtained from John Hobson QC who advised the Council that in his opinion a 10 year horizon beyond the life of the Plan would be appropriate. His opinion concluded by advising the Council that:

> "*….if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer-term needs could be met without encroaching into the Green Belt and eroding its boundaries*"

15 Having received this advice, offices recommended to the January 2015 Local Plan Working Group that safeguarded land designations be included in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.

16 The omission of this key component of safeguarded land from the Local Plan spatial strategy results in the Plan being fundamentally unsound, particularly as the Plan period is only up to 2033 and from the point of anticipated adoption in 2023 it will only be a 9-year plan with land identified for development needs for a further 5 years. This would give a Green Belt Boundary of 14 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs 10 years beyond.

Unmet need for Family housing

17 When it comes to the type of housing most needed in the City both the 2016 SHMA (SD051 and SD052) and the more recent analysis in the *Local Housing Needs Assessment* by Iceni (EX_CYC_92) confirm the majority of new units (up to 80%) should be 2 and 3 bedroom houses rather than flats, although consideration will

need to be given to site specific circumstances (which may in some cases lend themselves to flatted development). Additionally, the Council should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.

18 Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay. In addition the Iceni analysis finds that the proportion of households with dependent children in York is fairly low with around 25% of all households containing dependent children in 2011 (compared with regional and national averages of 29%).

19 However, this finding is not surprising given that significant shortfall in housing completions since 2011 coupled with the high level of communal establishments and student accommodation include included as part of the total completions. We have addressed this issue extensively in our representations over the years and in our submission to Phase 2 Matter 2 of the Examination (Housing Need and Requirement). Our evidence, based on the Council's annual monitoring reports[1] and the Council's housing trajectory identifies the shortfall in family housing in to be 2,605 dwellings (see table 2).

Table 2
Shortfall in family housing 2012/13- 2021/22

A	Requirement (790 x 10)	7,900
B	Completions	7,013
C	Shortfall (A-B)	887
D	Student accommodation and communal establishments included in completions	1,718
E	Potential shortfall in family housing (D+E)	**2,605**

20 So, in many respects the finding by Iceni of a smaller proportion of households with dependent children in the population can be explain in large part be explained by the shortfall in housing provision generally and the shortfall in family dwellings in particular.

[1] As summarised in Table X on page 6 of our paper presented on Matter 2 of the Phase 2 hearings.

21 This points to the need to include within the Plan even greater provision for sites that can deliver family housing, to redress this imbalance.

22 We have maintained through our representations, that the housing requirement figure is too low and, consequently, the level of house allocations it informs will not maintain a sufficient or steady supply of housing to meet the City's needs.

Affordable Housing

23 One of the more serious consequences of the slippage in the housing trajectory is the consequential slippage in the provision of affordable housing. Both the 2016 SHMA (SD051 and SD052) and the more recent *Local Housing Needs Assessment* by Iceni (EX_CYC_92) highlight the pressing need for affordable housing. Paragraph 4.61 of the Iceni assessment notes that "…the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the City".

24 The Iceni analysis suggests a need for 592 affordable homes per annum across the City an additional need across the City for 467 Affordable Housing Ownership (AHO) units per annum. However, additional supply from resales of market homes (below a lower quartile price) could reduce the need for AHO. Regardless, the need for affordable housing is significant.

25 One of the bullet points in modified policy SS1 (MM3.1) states:

> *Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*

26 This would mean the Local plan delivering 4,228 affordable dwellings in the Plan period.

27 The Council's Affordable Housing Note EX/CYC/107/2 (August 2022) indicates a total delivery of 3,255 affordable dwellings in the plan period. We estimate that at best delivery will be 3,046, allowing for slippage in the trajectory of Sites ST5, ST7, ST8 and ST14. In addition, we believe the Council has double counted site H56, Land at Hull Road. That site was completed in 2021/22 so would have been included in the figures for completions between 2017 and 2022. That reduces the completions in Table 2 of Appendix 1 of EX/CYC/107/2 to 2,151.

Table 3 – Affordable Dwellings Delivery 2017/18-2032/33

	Councils Figures*	**Galtres Adjusted**
Sites with Extant Permission	223	223
Completions Apr 2017-Apr2022	612	612
Council dleivery progam	60	60
Local Plan Allocations	2360	2151
	3,255	**3,046**

*** Appendix 1 of EX_CYC_107-2**

28 The annual average affordable delivery is therefore 190 dwellings per annum (3046÷16), compared with a need for 592 affordable homes (excluding AHO). This is an extremely low rate of affordable provision against the identified need. In addition, as we highlighted in our submission to Matter 1 of the Phase 3 hearings of the Examination (affordable housing), the existing stock of affordable housing in the City is being reduced annually by right to buy sales. In the 4 years 2017/18 to 2020/21, right to buy sales averaged 59 units per annum (Table 2 of our submission to Matter 1 Phase 3). If this rate were to be maintained over the Plan period, the annual addition of 190 affordable dwellings would be reduced to a net annual addition of 131 affordable dwellings.

29 The Council state thst their aspiration of trying to achieve 45% of the identified affordable housing need would require an additional 88 affordable houses per annum to be delivered over the remainder of the Plan period (paragraph 11 of EX/CYC/107/2. Based on our estimates of affordable housing delivery the figures would be 107 units per annum ((4,228 – 3046) ÷ 11)) There is no evidence whatsoever to demonstrate that this is achievable.

30 Consequently, the objective to realise 2,360 affordable homes through the operation of these policies cannot realised. Changes to the wording of paragraph 3.3 (MM3.5) are therefore proposed.

31 For the reasons set out in our submission to Matter 1 Phase 3 the significant need for affordable housing alone points to a need for additional housing provision and additional allocations.

SUGGESTED CHANGES TO THE PLAN

(i) Policy SS1 (MM3.1)

The plan will not ensure permanence of the Green Belt boundaries beyond the Plan period, because, de facto, there will only be 9 years of the Plan period left assuming the Plan is adopted in late 2023. In other words, the 5 years beyond the Plan period have become part of the Plan period. This shortfall could be remedied by identifying safeguarded land that could be brought forward in the event there is a shortfall in housing provision at the first review of the Plan. The Inspectors have evidence before them of omission sites, such as Galtres (Site ref: 964) that were considered suitable for allocation, that could be identified as safeguarded land.

The following sentence to be added at the end of the first paragraph of MM3.1

"In addition safeguarded land is identified to ensure that any deficiency in housing supply arising at review of the Plan can be rectified"

(ii) Policy SS1 (MM3.1)

The minimum annual average annual net provision of 822 dwellings per annum in bullet point of MM3.1 should be replaced with a figure of 1,026. In our previous representations at the various stages of the Local Plan and in our submissions the Examination we have present out case for an uplift to the housing requirement of 1,026 dwellings per annum. (Our representations on the proposed Modification in 2021 set out our evidence).

We have made the case in our previous representations on the Local Plan for the allocation of additional land (Galtres Garden Village) (Site Ref.)to address this uplift in the housing requirement but the modifications do not accommodate further discussion on this point.

(iii) Bullet point 4 of MM3.1 should be deleted

~~*Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*~~

(iv) Policy SS1 explanation paragraph 3.3 (MM3.5) suggested revised wording

Policies H7 and H10 set out the Plan's policy approach to this, and ~~at least~~ 2,360 affordable homes ~~are expected to~~ could be delivered within the plan period through the operation of these policies. Combined with recorded completions (to 1st April 2022), other sources of forecast supply on windfall sites and known provision secured through the Council's Housing Delivery Programme, it is estimated that around ~~3,265~~ 3,046 affordable homes could ~~will~~ be delivered in the plan period.

~~To help increase the proportion of need being met to more than 35%, the Council has set a target of providing at least 45% of its affordable housing need. Through its annual monitoring (in accordance with the delivery and monitoring framework at table 15.2), the Council will review progress on meeting the target and take appropriate action and intervention should delivery rates fall short. e market.~~

(v) Figure 5.1 – modification MM5.4

Because of the changes we have outlined to the Housing trajectory in Appendix 1, consequential changes will have to be made to the graph at Figure 5.1 of the Plan.

APPENDIX 1

Revised Housing Trajectory

(Our changes to Site trajectories are highlighted in Green)

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

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

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #428

COMPLETE

Started:	Monday, March 27, 2023 7:50:24 PM
Last Modified:	Monday, March 27, 2023 7:51:27 PM
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Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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459 responses

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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.4 Table 1a and 1b (housing supply and distribution)

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See attached document

Modification Ref: **MM3.1; MM3.2; MM3.4; MM3.5; and MM5.4**

Representation on behalf Galtres Garden Village Development Company

*(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is **SID 620)***

1 We object to the proposed modifications.

2 Modification 3.1 states that the plan period is 2017-2032/33 and that to ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet development needs for a further minimum period of 5 years to 2038. It further states that the plan will deliver a minimum average annual net provision of 822 dwellings over the plan period.

3 We object to this modification on several grounds.

Plan Period

(i) What is the Plan period? Already 7 years of the plan period have elapsed, and the six largest strategic allocations have yet to deliver a single dwelling. Indeed, the Trajectory presented in Table 1 of Housing Trajectory Note EX/CYC/107/1 (August 2022) indicates that the two largest allocation ST14 and ST15 will not deliver their first completions until 2021/26 and 2027/28 respectively. However, even those anticipated first completions are overly optimistic. Our revised trajectory for sites H1a&b; ST4; ST5; ST8; ST14; ST31 and ST33 is set out in Table 1 below and the full trajectory presented at Appendix 1 of this representation. What our adjusted trajectory demonstrates is considerable slippage in housing delivery. With 7 years of the 16-year plan gone, the plan is, de-facto a 9-year plan. Even including the additional 5 years for Green Belt would make it a 14-year plan, well short of the 15-year plan period recommended in paragraph 157 of the NPPF (2012). Put simply, the Plan will not meet the development needs of the City and in this respect it is fundamentally unsound.

(ii) Through the Plan preparation we have argued in our representations that what the Plan requires is additional housing allocations to increase the

number of outlets that could deliver housing so that in event some sites were delayed, as is proving to be the case, the trajectory could be maintained. For example, the Council's trajectory is anticipating 1,199 completions in 2025/25. Our revised trajectory demonstrates that is more likely to be 797 units. That is primarily because site H1a&b is unlikely to deliver 215 completions in 2024/25 given that construction has not yet started. That takes 215 units out of completions for that year.

(iii) It is quite extraordinary that **8 years** into the Plan period in 2025/26 the trajectory is anticipating an 'in year' undersupply of 88 dwellings and a cumulative **undersupply** of 360 dwellings. What this demonstrates is the Plan Spatial strategy and the allocations that flow from it simply will not deliver the housing needs of the City.

4 We have consistently maintained in our representations that the trajectory was always ambitious, but Table 1 of EX/CYC/107/1 proves that. When compared to the Trajectory presented at the examination in March 2022 (which has a base date of 2021) the delivery of some sites has moved significantly. Some examples are given in table 1 below. What this table demonstrates is that the delivery of some sites which lie at the heart of housing delivery and, affordable housing delivery in particular, has slipped significantly. For example, first delivery of dwellings on the largest site ST15, will not happen until 2027/28 - **10 years after the start date of the Plan!**

5 This calls into question the credibility the Local plan strategy.

Table 1

	First completions anticipated			
SIte	**EX/CYC/69 base date 1 April 2021**	**Appendix 1 of EX/CYC/79 Appendix 1 Housing trajectory base date 1 April 2022 (Supersedes EX/CYC/69)**	**Our amendments to Appendix of EX/CYC/79**	**Comments**
H1a&b	2023/24	2024/25	2025/26	Planning permission but no construction has started.
ST4	2023/24	2024/25	2025/26	Application submitted but not determined.
ST5	2023/24	2024/25	2025/26	
ST7	2024/25	2025/26	2026/27	No Application submitted
ST8	2022/23	2023/24	2024/25	Outline PP granted but no reserved matters submitted.
ST14	2023/24	2025/26	2026/27	No Application Submitted.
ST31	2023/24	2023/24	2024/25	Application submitted but not determined.
ST33	2023/24	2023/24	2024/25	Application submitted but not determined.

6 We believe our estimates of revised delivery trajectory is reasonable based on our experience of similar schemes and the Council's assumptions on delivery set out in paragraph 2.11of EX/CYC/76a. These (conservative) changes alone remove 460 dwellings that the Council were anticipating would be completed in 2022/22 – 2026/27 and push 379 dwelling that should have been completed on sites ST5, ST8 and ST14 in the Plan period the 5year beyond the plan period.

7 In many respects many of the elements of housing supply such as windfall aan student housing that the Council have includes will not address the 3 keys issues we identified in our representations:

- The shortage of housing
- The shortage of affordable housing
- The shortage of purpose built housing for an older population

8 These needs can only be addressed by strategic allocations. But most of the strategic allocations will not deliver housing for another 3-4 years - almost 10 years into the plan period!

Safeguarded Land

9 Proposed modification MM3.1 states:

> *"To ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet a further, minimum, period of 5 years to 2038."*

10 The evidence we have submitted at the various stages of the Local plan Consultation and to the examination demonstrates the Plan does not provide sufficient land to ensure Green Belt permanence. Leaving aside the question of additional allocations, an obvious way to address the issue of permanence would have been to identify safeguarded land which would have met the NPPF requirement of providing for the development needs well beyond the Plan period.

11 The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.

12 As already stated, the Green Belt boundaries around York are being <u>defined</u> (or established) for the first time. They are not being <u>altered.</u> The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.

13 Critically, the Council must demonstrate to the Local Plan Inspector that the Green Belt boundaries will not have to be altered at the end of the plan period. As our previous evidence has demonstrated, the Draft Plan has not allocated adequate land to meet housing needs within the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.

14 As we pointed out in our representations the 2019 Modifications exactly what constitutes "…well beyond…" the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015 and by the advice obtained from John Hobson QC who advised the Council that in his opinion a 10 year horizon beyond the life of the Plan would be appropriate. His opinion concluded by advising the Council that:

> "*….if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer-term needs could be met without encroaching into the Green Belt and eroding its boundaries*"

15 Having received this advice, offices recommended to the January 2015 Local Plan Working Group that safeguarded land designations be included in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.

16 The omission of this key component of safeguarded land from the Local Plan spatial strategy results in the Plan being fundamentally unsound, particularly as the Plan period is only up to 2033 and from the point of anticipated adoption in 2023 it will only be a 9-year plan with land identified for development needs for a further 5 years. This would give a Green Belt Boundary of 14 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs 10 years beyond.

Unmet need for Family housing

17 When it comes to the type of housing most needed in the City both the 2016 SHMA (SD051 and SD052) and the more recent analysis in the *Local Housing Needs Assessment* by Iceni (EX_CYC_92) confirm the majority of new units (up to 80%) should be 2 and 3 bedroom houses rather than flats, although consideration will

need to be given to site specific circumstances (which may in some cases lend themselves to flatted development). Additionally, the Council should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.

18 Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay. In addition the Iceni analysis finds that the proportion of households with dependent children in York is fairly low with around 25% of all households containing dependent children in 2011 (compared with regional and national averages of 29%).

19 However, this finding is not surprising given that significant shortfall in housing completions since 2011 coupled with the high level of communal establishments and student accommodation include included as part of the total completions. We have addressed this issue extensively in our representations over the years and in our submission to Phase 2 Matter 2 of the Examination (Housing Need and Requirement). Our evidence, based on the Council's annual monitoring reports[1] and the Council's housing trajectory identifies the shortfall in family housing in to be 2,605 dwellings (see table 2).

Table 2
Shortfall in family housing 2012/13- 2021/22

A	Requirement (790 x 10)	7,900
B	Completions	7,013
C	Shortfall (A-B)	887
D	Student accommodation and communal establishments included in completions	1,718
E	Potential shortfall in family housing (D+E)	**2,605**

20 So, in many respects the finding by Iceni of a smaller proportion of households with dependent children in the population can be explain in large part be explained by the shortfall in housing provision generally and the shortfall in family dwellings in particular.

[1] As summarised in Table X on page 6 of our paper presented on Matter 2 of the Phase 2 hearings.

21 This points to the need to include within the Plan even greater provision for sites that can deliver family housing, to redress this imbalance.

22 We have maintained through our representations, that the housing requirement figure is too low and, consequently, the level of house allocations it informs will not maintain a sufficient or steady supply of housing to meet the City's needs.

Affordable Housing

23 One of the more serious consequences of the slippage in the housing trajectory is the consequential slippage in the provision of affordable housing. Both the 2016 SHMA (SD051 and SD052) and the more recent *Local Housing Needs Assessment* by Iceni (EX_CYC_92) highlight the pressing need for affordable housing. Paragraph 4.61 of the Iceni assessment notes that "…the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the City".

24 The Iceni analysis suggests a need for 592 affordable homes per annum across the City an additional need across the City for 467 Affordable Housing Ownership (AHO) units per annum. However, additional supply from resales of market homes (below a lower quartile price) could reduce the need for AHO. Regardless, the need for affordable housing is significant.

25 One of the bullet points in modified policy SS1 (MM3.1) states:

> *Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*

26 This would mean the Local plan delivering 4,228 affordable dwellings in the Plan period.

27 The Council's Affordable Housing Note EX/CYC/107/2 (August 2022) indicates a total delivery of 3,255 affordable dwellings in the plan period. We estimate that at best delivery will be 3,046, allowing for slippage in the trajectory of Sites ST5, ST7, ST8 and ST14. In addition, we believe the Council has double counted site H56, Land at Hull Road. That site was completed in 2021/22 so would have been included in the figures for completions between 2017 and 2022. That reduces the completions in Table 2 of Appendix 1 of EX/CYC/107/2 to 2,151.

Table 3 – Affordable Dwellings Delivery 2017/18-2032/33

	Councils Figures*	**Galtres Adjusted**
Sites with Extant Permission	223	223
Completions Apr 2017-Apr2022	612	612
Council dleivery progam	60	60
Local Plan Allocations	2360	2151
	3,255	**3,046**

*** Appendix 1 of EX_CYC_107-2**

28 The annual average affordable delivery is therefore 190 dwellings per annum (3046÷16), compared with a need for 592 affordable homes (excluding AHO). This is an extremely low rate of affordable provision against the identified need. In addition, as we highlighted in our submission to Matter 1 of the Phase 3 hearings of the Examination (affordable housing), the existing stock of affordable housing in the City is being reduced annually by right to buy sales. In the 4 years 2017/18 to 2020/21, right to buy sales averaged 59 units per annum (Table 2 of our submission to Matter 1 Phase 3). If this rate were to be maintained over the Plan period, the annual addition of 190 affordable dwellings would be reduced to a net annual addition of 131 affordable dwellings.

29 The Council state thst their aspiration of trying to achieve 45% of the identified affordable housing need would require an additional 88 affordable houses per annum to be delivered over the remainder of the Plan period (paragraph 11 of EX/CYC/107/2. Based on our estimates of affordable housing delivery the figures would be 107 units per annum ((4,228 – 3046) ÷ 11)) There is no evidence whatsoever to demonstrate that this is achievable.

30 Consequently, the objective to realise 2,360 affordable homes through the operation of these policies cannot realised. Changes to the wording of paragraph 3.3 (MM3.5) are therefore proposed.

31 For the reasons set out in our submission to Matter 1 Phase 3 the significant need for affordable housing alone points to a need for additional housing provision and additional allocations.

SUGGESTED CHANGES TO THE PLAN

(i) Policy SS1 (MM3.1)

The plan will not ensure permanence of the Green Belt boundaries beyond the Plan period, because, de facto, there will only be 9 years of the Plan period left assuming the Plan is adopted in late 2023. In other words, the 5 years beyond the Plan period have become part of the Plan period. This shortfall could be remedied by identifying safeguarded land that could be brought forward in the event there is a shortfall in housing provision at the first review of the Plan. The Inspectors have evidence before them of omission sites, such as Galtres (Site ref: 964) that were considered suitable for allocation, that could be identified as safeguarded land.

The following sentence to be added at the end of the first paragraph of MM3.1

"In addition safeguarded land is identified to ensure that any deficiency in housing supply arising at review of the Plan can be rectified"

(ii) Policy SS1 (MM3.1)

The minimum annual average annual net provision of 822 dwellings per annum in bullet point of MM3.1 should be replaced with a figure of 1,026. In our previous representations at the various stages of the Local Plan and in our submissions the Examination we have present out case for an uplift to the housing requirement of 1,026 dwellings per annum. (Our representations on the proposed Modification in 2021 set out our evidence).

We have made the case in our previous representations on the Local Plan for the allocation of additional land (Galtres Garden Village) (Site Ref.)to address this uplift in the housing requirement but the modifications do not accommodate further discussion on this point.

(iii) Bullet point 4 of MM3.1 should be deleted

~~*Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*~~

(iv) Policy SS1 explanation paragraph 3.3 (MM3.5) suggested revised wording

Policies H7 and H10 set out the Plan's policy approach to this, and ~~at least~~ 2,360 affordable homes ~~are expected to~~ could be delivered within the plan period through the operation of these policies. Combined with recorded completions (to 1st April 2022), other sources of forecast supply on windfall sites and known provision secured through the Council's Housing Delivery Programme, it is estimated that around ~~3,265~~ 3,046 affordable homes could ~~will~~ be delivered in the plan period.

~~To help increase the proportion of need being met to more than 35%, the Council has set a target of providing at least 45% of its affordable housing need. Through its annual monitoring (in accordance with the delivery and monitoring framework at table 15.2), the Council will review progress on meeting the target and take appropriate action and intervention should delivery rates fall short. e market.~~

(v) Figure 5.1 – modification MM5.4

Because of the changes we have outlined to the Housing trajectory in Appendix 1, consequential changes will have to be made to the graph at Figure 5.1 of the Plan.

APPENDIX 1

Revised Housing Trajectory

(Our changes to Site trajectories are highlighted in Green)

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

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

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #429

COMPLETE

Started:	Monday, March 27, 2023 7:51:28 PM
Last Modified:	Monday, March 27, 2023 7:52:40 PM
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Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.5 Policy SS1 Explanation – paragraph 3.3

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See attached representation document

Modification Ref: **MM3.1; MM3.2; MM3.4; MM3.5; and MM5.4**

Representation on behalf Galtres Garden Village Development Company

*(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is **SID 620**)*

1 We object to the proposed modifications.

2 Modification 3.1 states that the plan period is 2017-2032/33 and that to ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet development needs for a further minimum period of 5 years to 2038. It further states that the plan will deliver a minimum average annual net provision of 822 dwellings over the plan period.

3 We object to this modification on several grounds.

Plan Period

(i) What is the Plan period? Already 7 years of the plan period have elapsed, and the six largest strategic allocations have yet to deliver a single dwelling. Indeed, the Trajectory presented in Table 1 of Housing Trajectory Note EX/CYC/107/1 (August 2022) indicates that the two largest allocation ST14 and ST15 will not deliver their first completions until 2021/26 and 2027/28 respectively. However, even those anticipated first completions are overly optimistic. Our revised trajectory for sites H1a&b; ST4; ST5; ST8; ST14; ST31 and ST33 is set out in Table 1 below and the full trajectory presented at Appendix 1 of this representation. What our adjusted trajectory demonstrates is considerable slippage in housing delivery. With 7 years of the 16-year plan gone, the plan is, de-facto a 9-year plan. Even including the additional 5 years for Green Belt would make it a 14-year plan, well short of the 15-year plan period recommended in paragraph 157 of the NPPF (2012). Put simply, the Plan will not meet the development needs of the City and in this respect it is fundamentally unsound.

(ii) Through the Plan preparation we have argued in our representations that what the Plan requires is additional housing allocations to increase the

number of outlets that could deliver housing so that in event some sites were delayed, as is proving to be the case, the trajectory could be maintained. For example, the Council's trajectory is anticipating 1,199 completions in 2025/25. Our revised trajectory demonstrates that is more likely to be 797 units. That is primarily because site H1a&b is unlikely to deliver 215 completions in 2024/25 given that construction has not yet started. That takes 215 units out of completions for that year.

(iii) It is quite extraordinary that **8 years** into the Plan period in 2025/26 the trajectory is anticipating an 'in year' undersupply of 88 dwellings and a cumulative **undersupply** of 360 dwellings. What this demonstrates is the Plan Spatial strategy and the allocations that flow from it simply will not deliver the housing needs of the City.

4 We have consistently maintained in our representations that the trajectory was always ambitious, but Table 1 of EX/CYC/107/1 proves that. When compared to the Trajectory presented at the examination in March 2022 (which has a base date of 2021) the delivery of some sites has moved significantly. Some examples are given in table 1 below. What this table demonstrates is that the delivery of some sites which lie at the heart of housing delivery and, affordable housing delivery in particular, has slipped significantly. For example, first delivery of dwellings on the largest site ST15, will not happen until 2027/28 - **10 years after the start date of the Plan!**

5 This calls into question the credibility the Local plan strategy.

Table 1

	First completions anticipated			
SIte	**EX/CYC/69 base date 1 April 2021**	**Appendix 1 of EX/CYC/79 Appendix 1 Housing trajectory base date 1 April 2022 (Supersedes EX/CYC/69)**	**Our amendments to Appendix of EX/CYC/79**	**Comments**
H1a&b	2023/24	2024/25	2025/26	Planning permission but no construction has started.
ST4	2023/24	2024/25	2025/26	Application submitted but not determined.
ST5	2023/24	2024/25	2025/26	
ST7	2024/25	2025/26	2026/27	No Application submitted
ST8	2022/23	2023/24	2024/25	Outline PP granted but no reserved matters submitted.
ST14	2023/24	2025/26	2026/27	No Application Submitted.
ST31	2023/24	2023/24	2024/25	Application submitted but not determined.
ST33	2023/24	2023/24	2024/25	Application submitted but not determined.

6 We believe our estimates of revised delivery trajectory is reasonable based on our experience of similar schemes and the Council's assumptions on delivery set out in paragraph 2.11of EX/CYC/76a. These (conservative) changes alone remove 460 dwellings that the Council were anticipating would be completed in 2022/22 – 2026/27 and push 379 dwelling that should have been completed on sites ST5, ST8 and ST14 in the Plan period the 5year beyond the plan period.

7 In many respects many of the elements of housing supply such as windfall aan student housing that the Council have includes will not address the 3 keys issues we identified in our representations:

- The shortage of housing
- The shortage of affordable housing
- The shortage of purpose built housing for an older population

8 These needs can only be addressed by strategic allocations. But most of the strategic allocations will not deliver housing for another 3-4 years - almost 10 years into the plan period!

Safeguarded Land

9 Proposed modification MM3.1 states:

> *"To ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet a further, minimum, period of 5 years to 2038."*

10 The evidence we have submitted at the various stages of the Local plan Consultation and to the examination demonstrates the Plan does not provide sufficient land to ensure Green Belt permanence. Leaving aside the question of additional allocations, an obvious way to address the issue of permanence would have been to identify safeguarded land which would have met the NPPF requirement of providing for the development needs well beyond the Plan period.

11 The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.

12 As already stated, the Green Belt boundaries around York are being <u>defined</u> (or established) for the first time. They are not being <u>altered.</u> The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.

13 Critically, the Council must demonstrate to the Local Plan Inspector that the Green Belt boundaries will not have to be altered at the end of the plan period. As our previous evidence has demonstrated, the Draft Plan has not allocated adequate land to meet housing needs within the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.

14 As we pointed out in our representations the 2019 Modifications exactly what constitutes "…well beyond…" the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015 and by the advice obtained from John Hobson QC who advised the Council that in his opinion a 10 year horizon beyond the life of the Plan would be appropriate. His opinion concluded by advising the Council that:

> "*….if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer-term needs could be met without encroaching into the Green Belt and eroding its boundaries*"

15 Having received this advice, offices recommended to the January 2015 Local Plan Working Group that safeguarded land designations be included in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.

16 The omission of this key component of safeguarded land from the Local Plan spatial strategy results in the Plan being fundamentally unsound, particularly as the Plan period is only up to 2033 and from the point of anticipated adoption in 2023 it will only be a 9-year plan with land identified for development needs for a further 5 years. This would give a Green Belt Boundary of 14 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs 10 years beyond.

Unmet need for Family housing

17 When it comes to the type of housing most needed in the City both the 2016 SHMA (SD051 and SD052) and the more recent analysis in the *Local Housing Needs Assessment* by Iceni (EX_CYC_92) confirm the majority of new units (up to 80%) should be 2 and 3 bedroom houses rather than flats, although consideration will

need to be given to site specific circumstances (which may in some cases lend themselves to flatted development). Additionally, the Council should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.

18 Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay. In addition the Iceni analysis finds that the proportion of households with dependent children in York is fairly low with around 25% of all households containing dependent children in 2011 (compared with regional and national averages of 29%).

19 However, this finding is not surprising given that significant shortfall in housing completions since 2011 coupled with the high level of communal establishments and student accommodation include included as part of the total completions. We have addressed this issue extensively in our representations over the years and in our submission to Phase 2 Matter 2 of the Examination (Housing Need and Requirement). Our evidence, based on the Council's annual monitoring reports[1] and the Council's housing trajectory identifies the shortfall in family housing in to be 2,605 dwellings (see table 2).

Table 2
Shortfall in family housing 2012/13- 2021/22

A	Requirement (790 x 10)	7,900
B	Completions	7,013
C	Shortfall (A-B)	887
D	Student accommodation and communal establishments included in completions	1,718
E	Potential shortfall in family housing (D+E)	**2,605**

20 So, in many respects the finding by Iceni of a smaller proportion of households with dependent children in the population can be explain in large part be explained by the shortfall in housing provision generally and the shortfall in family dwellings in particular.

[1] As summarised in Table X on page 6 of our paper presented on Matter 2 of the Phase 2 hearings.

21 This points to the need to include within the Plan even greater provision for sites that can deliver family housing, to redress this imbalance.

22 We have maintained through our representations, that the housing requirement figure is too low and, consequently, the level of house allocations it informs will not maintain a sufficient or steady supply of housing to meet the City's needs.

Affordable Housing

23 One of the more serious consequences of the slippage in the housing trajectory is the consequential slippage in the provision of affordable housing. Both the 2016 SHMA (SD051 and SD052) and the more recent *Local Housing Needs Assessment* by Iceni (EX_CYC_92) highlight the pressing need for affordable housing. Paragraph 4.61 of the Iceni assessment notes that "…the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the City".

24 The Iceni analysis suggests a need for 592 affordable homes per annum across the City an additional need across the City for 467 Affordable Housing Ownership (AHO) units per annum. However, additional supply from resales of market homes (below a lower quartile price) could reduce the need for AHO. Regardless, the need for affordable housing is significant.

25 One of the bullet points in modified policy SS1 (MM3.1) states:

> *Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*

26 This would mean the Local plan delivering 4,228 affordable dwellings in the Plan period.

27 The Council's Affordable Housing Note EX/CYC/107/2 (August 2022) indicates a total delivery of 3,255 affordable dwellings in the plan period. We estimate that at best delivery will be 3,046, allowing for slippage in the trajectory of Sites ST5, ST7, ST8 and ST14. In addition, we believe the Council has double counted site H56, Land at Hull Road. That site was completed in 2021/22 so would have been included in the figures for completions between 2017 and 2022. That reduces the completions in Table 2 of Appendix 1 of EX/CYC/107/2 to 2,151.

Table 3 – Affordable Dwellings Delivery 2017/18-2032/33

	Councils Figures*	**Galtres Adjusted**
Sites with Extant Permission	223	223
Completions Apr 2017-Apr2022	612	612
Council dleivery progam	60	60
Local Plan Allocations	2360	2151
	3,255	**3,046**

*** Appendix 1 of EX_CYC_107-2**

28 The annual average affordable delivery is therefore 190 dwellings per annum (3046÷16), compared with a need for 592 affordable homes (excluding AHO). This is an extremely low rate of affordable provision against the identified need. In addition, as we highlighted in our submission to Matter 1 of the Phase 3 hearings of the Examination (affordable housing), the existing stock of affordable housing in the City is being reduced annually by right to buy sales. In the 4 years 2017/18 to 2020/21, right to buy sales averaged 59 units per annum (Table 2 of our submission to Matter 1 Phase 3). If this rate were to be maintained over the Plan period, the annual addition of 190 affordable dwellings would be reduced to a net annual addition of 131 affordable dwellings.

29 The Council state thst their aspiration of trying to achieve 45% of the identified affordable housing need would require an additional 88 affordable houses per annum to be delivered over the remainder of the Plan period (paragraph 11 of EX/CYC/107/2. Based on our estimates of affordable housing delivery the figures would be 107 units per annum ((4,228 – 3046) ÷ 11)) There is no evidence whatsoever to demonstrate that this is achievable.

30 Consequently, the objective to realise 2,360 affordable homes through the operation of these policies cannot realised. Changes to the wording of paragraph 3.3 (MM3.5) are therefore proposed.

31 For the reasons set out in our submission to Matter 1 Phase 3 the significant need for affordable housing alone points to a need for additional housing provision and additional allocations.

SUGGESTED CHANGES TO THE PLAN

(i) Policy SS1 (MM3.1)

The plan will not ensure permanence of the Green Belt boundaries beyond the Plan period, because, de facto, there will only be 9 years of the Plan period left assuming the Plan is adopted in late 2023. In other words, the 5 years beyond the Plan period have become part of the Plan period. This shortfall could be remedied by identifying safeguarded land that could be brought forward in the event there is a shortfall in housing provision at the first review of the Plan. The Inspectors have evidence before them of omission sites, such as Galtres (Site ref: 964) that were considered suitable for allocation, that could be identified as safeguarded land.

The following sentence to be added at the end of the first paragraph of MM3.1

"In addition safeguarded land is identified to ensure that any deficiency in housing supply arising at review of the Plan can be rectified"

(ii) Policy SS1 (MM3.1)

The minimum annual average annual net provision of 822 dwellings per annum in bullet point of MM3.1 should be replaced with a figure of 1,026. In our previous representations at the various stages of the Local Plan and in our submissions the Examination we have present out case for an uplift to the housing requirement of 1,026 dwellings per annum. (Our representations on the proposed Modification in 2021 set out our evidence).

We have made the case in our previous representations on the Local Plan for the allocation of additional land (Galtres Garden Village) (Site Ref.)to address this uplift in the housing requirement but the modifications do not accommodate further discussion on this point.

(iii) Bullet point 4 of MM3.1 should be deleted

~~Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.~~

(iv) Policy SS1 explanation paragraph 3.3 (MM3.5) suggested revised wording

Policies H7 and H10 set out the Plan's policy approach to this, and ~~at least~~ 2,360 affordable homes ~~are expected to~~ could be delivered within the plan period through the operation of these policies. Combined with recorded completions (to 1st April 2022), other sources of forecast supply on windfall sites and known provision secured through the Council's Housing Delivery Programme, it is estimated that around ~~3,265~~ 3,046 affordable homes could ~~will~~ be delivered in the plan period.

~~To help increase the proportion of need being met to more than 35%, the Council has set a target of providing at least 45% of its affordable housing need. Through its annual monitoring (in accordance with the delivery and monitoring framework at table 15.2), the Council will review progress on meeting the target and take appropriate action and intervention should delivery rates fall short. e market.~~

(v) Figure 5.1 – modification MM5.4

Because of the changes we have outlined to the Housing trajectory in Appendix 1, consequential changes will have to be made to the graph at Figure 5.1 of the Plan.

APPENDIX 1

Revised Housing Trajectory

(Our changes to Site trajectories are highlighted in Green)

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

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

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #430

COMPLETE

Started: Monday, March 27, 2023 7:52:41 PM
Last Modified: Monday, March 27, 2023 7:54:17 PM
Time Spent: 00:01:36
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Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.4 Policy H1 Explanation

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See attached representation document

Chartered Town Planning Consultants

Modification Ref: **MM3.1; MM3.2; MM3.4; MM3.5; and MM5.4**

Representation on behalf Galtres Garden Village Development Company

*(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is **SID 620)***

1 We object to the proposed modifications.

2 Modification 3.1 states that the plan period is 2017-2032/33 and that to ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet development needs for a further minimum period of 5 years to 2038. It further states that the plan will deliver a minimum average annual net provision of 822 dwellings over the plan period.

3 We object to this modification on several grounds.

Plan Period

(i) What is the Plan period? Already 7 years of the plan period have elapsed, and the six largest strategic allocations have yet to deliver a single dwelling. Indeed, the Trajectory presented in Table 1 of Housing Trajectory Note EX/CYC/107/1 (August 2022) indicates that the two largest allocation ST14 and ST15 will not deliver their first completions until 2021/26 and 2027/28 respectively. However, even those anticipated first completions are overly optimistic. Our revised trajectory for sites H1a&b; ST4; ST5; ST8; ST14; ST31 and ST33 is set out in Table 1 below and the full trajectory presented at Appendix 1 of this representation. What our adjusted trajectory demonstrates is considerable slippage in housing delivery. With 7 years of the 16-year plan gone, the plan is, de-facto a 9-year plan. Even including the additional 5 years for Green Belt would make it a 14-year plan, well short of the 15-year plan period recommended in paragraph 157 of the NPPF (2012). Put simply, the Plan will not meet the development needs of the City and in this respect it is fundamentally unsound.

(ii) Through the Plan preparation we have argued in our representations that what the Plan requires is additional housing allocations to increase the

number of outlets that could deliver housing so that in event some sites were delayed, as is proving to be the case, the trajectory could be maintained. For example, the Council's trajectory is anticipating 1,199 completions in 2025/25. Our revised trajectory demonstrates that is more likely to be 797 units. That is primarily because site H1a&b is unlikely to deliver 215 completions in 2024/25 given that construction has not yet started. That takes 215 units out of completions for that year.

(iii) It is quite extraordinary that **8 years** into the Plan period in 2025/26 the trajectory is anticipating an 'in year' undersupply of 88 dwellings and a cumulative **undersupply** of 360 dwellings. What this demonstrates is the Plan Spatial strategy and the allocations that flow from it simply will not deliver the housing needs of the City.

4 We have consistently maintained in our representations that the trajectory was always ambitious, but Table 1 of EX/CYC/107/1 proves that. When compared to the Trajectory presented at the examination in March 2022 (which has a base date of 2021) the delivery of some sites has moved significantly. Some examples are given in table 1 below. What this table demonstrates is that the delivery of some sites which lie at the heart of housing delivery and, affordable housing delivery in particular, has slipped significantly. For example, first delivery of dwellings on the largest site ST15, will not happen until 2027/28 - **10 years after the start date of the Plan!**

5 This calls into question the credibility the Local plan strategy.

O'Neill ASSOCIATES

Table 1

	First completions anticipated			
SIte	**EX/CYC/69 base date 1 April 2021**	**Appendix 1 of EX/CYC/79 Appendix 1 Housing trajectory base date 1 April 2022 (Supersedes EX/CYC/69)**	**Our amendments to Appendix of EX/CYC/79**	**Comments**
H1a&b	2023/24	2024/25	2025/26	Planning permission but no construction has started.
ST4	2023/24	2024/25	2025/26	Application submitted but not determined.
ST5	2023/24	2024/25	2025/26	
ST7	2024/25	2025/26	2026/27	No Application submitted
ST8	2022/23	2023/24	2024/25	Outline PP granted but no reserved matters submitted.
ST14	2023/24	2025/26	2026/27	No Application Submitted.
ST31	2023/24	2023/24	2024/25	Application submitted but not determined.
ST33	2023/24	2023/24	2024/25	Application submitted but not determined.

6 We believe our estimates of revised delivery trajectory is reasonable based on our experience of similar schemes and the Council's assumptions on delivery set out in paragraph 2.11of EX/CYC/76a. These (conservative) changes alone remove 460 dwellings that the Council were anticipating would be completed in 2022/22 – 2026/27 and push 379 dwelling that should have been completed on sites ST5, ST8 and ST14 in the Plan period the 5year beyond the plan period.

7 In many respects many of the elements of housing supply such as windfall aan student housing that the Council have includes will not address the 3 keys issues we identified in our representations:

- The shortage of housing
- The shortage of affordable housing
- The shortage of purpose built housing for an older population

8 These needs can only be addressed by strategic allocations. But most of the strategic allocations will not deliver housing for another 3-4 years - almost 10 years into the plan period!

Safeguarded Land

9 Proposed modification MM3.1 states:

> *"To ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet a further, minimum, period of 5 years to 2038."*

10 The evidence we have submitted at the various stages of the Local plan Consultation and to the examination demonstrates the Plan does not provide sufficient land to ensure Green Belt permanence. Leaving aside the question of additional allocations, an obvious way to address the issue of permanence would have been to identify safeguarded land which would have met the NPPF requirement of providing for the development needs well beyond the Plan period.

11 The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.

12 As already stated, the Green Belt boundaries around York are being <u>defined</u> (or established) for the first time. They are not being <u>altered.</u> The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.

13 Critically, the Council must demonstrate to the Local Plan Inspector that the Green Belt boundaries will not have to be altered at the end of the plan period. As our previous evidence has demonstrated, the Draft Plan has not allocated adequate land to meet housing needs within the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.

14 As we pointed out in our representations the 2019 Modifications exactly what constitutes "…well beyond…" the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015 and by the advice obtained from John Hobson QC who advised the Council that in his opinion a 10 year horizon beyond the life of the Plan would be appropriate. His opinion concluded by advising the Council that:

> "*….if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer-term needs could be met without encroaching into the Green Belt and eroding its boundaries*"

15 Having received this advice, offices recommended to the January 2015 Local Plan Working Group that safeguarded land designations be included in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.

16 The omission of this key component of safeguarded land from the Local Plan spatial strategy results in the Plan being fundamentally unsound, particularly as the Plan period is only up to 2033 and from the point of anticipated adoption in 2023 it will only be a 9-year plan with land identified for development needs for a further 5 years. This would give a Green Belt Boundary of 14 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs 10 years beyond.

Unmet need for Family housing

17 When it comes to the type of housing most needed in the City both the 2016 SHMA (SD051 and SD052) and the more recent analysis in the *Local Housing Needs Assessment* by Iceni (EX_CYC_92) confirm the majority of new units (up to 80%) should be 2 and 3 bedroom houses rather than flats, although consideration will

need to be given to site specific circumstances (which may in some cases lend themselves to flatted development). Additionally, the Council should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.

18 Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay. In addition the Iceni analysis finds that the proportion of households with dependent children in York is fairly low with around 25% of all households containing dependent children in 2011 (compared with regional and national averages of 29%).

19 However, this finding is not surprising given that significant shortfall in housing completions since 2011 coupled with the high level of communal establishments and student accommodation include included as part of the total completions. We have addressed this issue extensively in our representations over the years and in our submission to Phase 2 Matter 2 of the Examination (Housing Need and Requirement). Our evidence, based on the Council's annual monitoring reports[1] and the Council's housing trajectory identifies the shortfall in family housing in to be 2,605 dwellings (see table 2).

Table 2
Shortfall in family housing 2012/13- 2021/22

A	Requirement (790 x 10)	7,900
B	Completions	7,013
C	Shortfall (A-B)	887
D	Student accommodation and communal establishments included in completions	1,718
E	Potential shortfall in family housing (D+E)	**2,605**

20 So, in many respects the finding by Iceni of a smaller proportion of households with dependent children in the population can be explain in large part be explained by the shortfall in housing provision generally and the shortfall in family dwellings in particular.

[1] As summarised in Table X on page 6 of our paper presented on Matter 2 of the Phase 2 hearings.

21 This points to the need to include within the Plan even greater provision for sites that can deliver family housing, to redress this imbalance.

22 We have maintained through our representations, that the housing requirement figure is too low and, consequently, the level of house allocations it informs will not maintain a sufficient or steady supply of housing to meet the City's needs.

Affordable Housing

23 One of the more serious consequences of the slippage in the housing trajectory is the consequential slippage in the provision of affordable housing. Both the 2016 SHMA (SD051 and SD052) and the more recent *Local Housing Needs Assessment* by Iceni (EX_CYC_92) highlight the pressing need for affordable housing. Paragraph 4.61 of the Iceni assessment notes that "...the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the City".

24 The Iceni analysis suggests a need for 592 affordable homes per annum across the City an additional need across the City for 467 Affordable Housing Ownership (AHO) units per annum. However, additional supply from resales of market homes (below a lower quartile price) could reduce the need for AHO. Regardless, the need for affordable housing is significant.

25 One of the bullet points in modified policy SS1 (MM3.1) states:

> *Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.*

26 This would mean the Local plan delivering 4,228 affordable dwellings in the Plan period.

27 The Council's Affordable Housing Note EX/CYC/107/2 (August 2022) indicates a total delivery of 3,255 affordable dwellings in the plan period. We estimate that at best delivery will be 3,046, allowing for slippage in the trajectory of Sites ST5, ST7, ST8 and ST14. In addition, we believe the Council has double counted site H56, Land at Hull Road. That site was completed in 2021/22 so would have been included in the figures for completions between 2017 and 2022. That reduces the completions in Table 2 of Appendix 1 of EX/CYC/107/2 to 2,151.

Table 3 – Affordable Dwellings Delivery 2017/18-2032/33

	Councils Figures*	**Galtres Adjusted**
Sites with Extant Permission	223	223
Completions Apr 2017-Apr2022	612	612
Council dleivery progam	60	60
Local Plan Allocations	2360	2151
	3,255	**3,046**

*** Appendix 1 of EX_CYC_107-2**

28 The annual average affordable delivery is therefore 190 dwellings per annum (3046÷16), compared with a need for 592 affordable homes (excluding AHO). This is an extremely low rate of affordable provision against the identified need. In addition, as we highlighted in our submission to Matter 1 of the Phase 3 hearings of the Examination (affordable housing), the existing stock of affordable housing in the City is being reduced annually by right to buy sales. In the 4 years 2017/18 to 2020/21, right to buy sales averaged 59 units per annum (Table 2 of our submission to Matter 1 Phase 3). If this rate were to be maintained over the Plan period, the annual addition of 190 affordable dwellings would be reduced to a net annual addition of 131 affordable dwellings.

29 The Council state thst their aspiration of trying to achieve 45% of the identified affordable housing need would require an additional 88 affordable houses per annum to be delivered over the remainder of the Plan period (paragraph 11 of EX/CYC/107/2. Based on our estimates of affordable housing delivery the figures would be 107 units per annum ((4,228 – 3046) ÷ 11)) There is no evidence whatsoever to demonstrate that this is achievable.

30 Consequently, the objective to realise 2,360 affordable homes through the operation of these policies cannot realised. Changes to the wording of paragraph 3.3 (MM3.5) are therefore proposed.

31 For the reasons set out in our submission to Matter 1 Phase 3 the significant need for affordable housing alone points to a need for additional housing provision and additional allocations.

SUGGESTED CHANGES TO THE PLAN

(i) Policy SS1 (MM3.1)

The plan will not ensure permanence of the Green Belt boundaries beyond the Plan period, because, de facto, there will only be 9 years of the Plan period left assuming the Plan is adopted in late 2023. In other words, the 5 years beyond the Plan period have become part of the Plan period. This shortfall could be remedied by identifying safeguarded land that could be brought forward in the event there is a shortfall in housing provision at the first review of the Plan. The Inspectors have evidence before them of omission sites, such as Galtres (Site ref: 964) that were considered suitable for allocation, that could be identified as safeguarded land.

The following sentence to be added at the end of the first paragraph of MM3.1

"In addition safeguarded land is identified to ensure that any deficiency in housing supply arising at review of the Plan can be rectified"

(ii) Policy SS1 (MM3.1)

The minimum annual average annual net provision of 822 dwellings per annum in bullet point of MM3.1 should be replaced with a figure of 1,026. In our previous representations at the various stages of the Local Plan and in our submissions the Examination we have present out case for an uplift to the housing requirement of 1,026 dwellings per annum. (Our representations on the proposed Modification in 2021 set out our evidence).

We have made the case in our previous representations on the Local Plan for the allocation of additional land (Galtres Garden Village) (Site Ref.)to address this uplift in the housing requirement but the modifications do not accommodate further discussion on this point.

(iii) Bullet point 4 of MM3.1 should be deleted

~~Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.~~

(iv) Policy SS1 explanation paragraph 3.3 (MM3.5) suggested revised wording

Policies H7 and H10 set out the Plan's policy approach to this, and ~~at least~~ 2,360 affordable homes ~~are expected to~~ could be delivered within the plan period through the operation of these policies. Combined with recorded completions (to 1st April 2022), other sources of forecast supply on windfall sites and known provision secured through the Council's Housing Delivery Programme, it is estimated that around ~~3,265~~ 3,046 affordable homes could ~~will~~ be delivered in the plan period.

~~To help increase the proportion of need being met to more than 35%, the Council has set a target of providing at least 45% of its affordable housing need. Through its annual monitoring (in accordance with the delivery and monitoring framework at table 15.2), the Council will review progress on meeting the target and take appropriate action and intervention should delivery rates fall short. e market.~~

(v) Figure 5.1 – modification MM5.4

Because of the changes we have outlined to the Housing trajectory in Appendix 1, consequential changes will have to be made to the graph at Figure 5.1 of the Plan.

APPENDIX 1

Revised Housing Trajectory

(Our changes to Site trajectories are highlighted in Green)

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

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

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #431

COMPLETE

Started: Monday, March 27, 2023 7:54:18 PM
Last Modified: Monday, March 27, 2023 7:55:52 PM
Time Spent: 00:01:34
IP Address: 188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.3 Policy H1 Explanation – paragraphs 5.4 to 5.16

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See representation in attached document

Modification Ref: **MM5.3;**

Representation on behalf Galtres Garden Village Development Company

*(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is **SID 620)***

1 We object to the proposed modification.

Paragraph 5.3

2 Paragraph 5.3 of proposed modification M5.3 states that:

> *The sites allocated for housing will provide a range and choice of sites capable of meeting future requirements and in line with the spatial strategy for the City detailed in section 3.*

3 This statement is clearly incorrect and misleading. The representations we have made to proposed modifications MM3.1; MM3.2; MM3.4; MM3.5, demonstrate that because of slippage in the delivery of first completions on strategic sites, the proposed housing allocations and therefore the Local Plan will not meet the future requirements of the City

4 Paragraph 5.3 goes on to state that:

> *An estimated yield is attributed to each site and is an indicative figure to demonstrate how the Local Plan housing requirement can be met.*

5 Again we believe this statement to be incorrect because the Council's Trajectory has demonstrated there is a cumulative shortfall in housing delivery 7 years into the Plan Period. Our revision of the housing trajectory (see appendix 1) demonstrates this shortfall persists 8 years in to the Plan period.

Suggested Amendment to the wording of paragraph 5.3 (MM5.3)

> *~~The sites allocated for housing will provide a range and choice of sites capable of meeting future requirements and in line with the spatial~~*

> *~~strategy for the City detailed in section 3~~. An estimated yield is attributed to each site allocated for housing ~~to each site~~ and is an indicative figure to demonstrate how the Local Plan housing requirement ~~can~~ might be met.*

Paragraph 5.9 (MM5.3)

6 References in paragraph 5.9 to 822 dwellings should be amended to 1,024 dwellings for the reasons set out in our representations on proposed modifications MM3.1; MM3.2; MM3.4; MM3.5

Paragraph 5.10 (MM5.3)

7 Paragraph 5.10 of modification MM5.3 states that:

> *A number sites are not expected to complete within the plan period. The total allocated capacity of sites exceeds the Council's housing requirement and if delivery rates can be increased then these sites could provide additional supply to react to market signals.*

8 This statement contradicts the Councils own evidence set out in the housing Land Supply Update EX/CYC/76a. That document explains that the Council considers it appropriate to retain the previously assumed rate of 35 dwellings per outlet per annum having regard to:

- build rates recorded up to 2021 on completed and under development sites, (evidence presented in table 4, EX/HS/P2/M5/HLS/1);
- local intelligence from site developers and promoters, provided through the Council's bi-annual Developer Forum; and,
- build rates recently applied in neighbouring local authorities, including those which are in/partly in the same housing market area.

9 What this demonstrates is that the build out rates are based on reasonable evidence and cannot simply be turned up in response to increased demand. The development of sits is based on requirements for construction workers, materials orders; sales staff etc…. and is determine by the anticipated sales rates and cannot be quickly changed – particularly in an industry with well documented worker shortages.

10 We have explained in our previous representations that consistency of supply can only be guaranteed by having a broader range of sites and outlets and not by simply "turning up" supply on existing outlets.

Suggested Amendment to the wording of paragraph 5.10 (MM5.3)

~~*A number sites are not expected to complete within the plan period. The total allocated capacity of sites exceeds the Council's housing requirement and if delivery rates can be increased then these sites could provide additional supply to react to market signals*~~

APPENDIX 1

Revised Housing Trajectory

(Our changes to Site trajectories are highlighted in Green)

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

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

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #434

COMPLETE

Started:	Monday, March 27, 2023 7:55:53 PM
Last Modified:	Monday, March 27, 2023 7:57:20 PM
Time Spent:	00:01:27
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY 459 responses

Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.21 Policy H10: Affordable Housing

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won’t work

Not consistent with national policy - i.e. doesn’t comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See attached representation document

O'Neill ASSOCIATES
Chartered Town Planning Consultants

Modification Ref: **MM5.21; MM5.22**

Representation on behalf Galtres Garden Village Development Company

*(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is **SID 620**)*

1 We object to the proposed modifications.

2 Paragraph i. of modified Policy H10 states:

> *affordable housing is provided in accordance with Table 5.4 as a minimum. Higher rates of provision will be sought where development viability is not compromised.*

3 The modification to paragraph 5.22 (policy H10 explanation) however states:

> *Based on viability evidence prepared in support of the Local Plan, developments within York are expected to provide minimum levels of affordable homes set out in Policy H10. Therefore, no individual assessment will be required where proposals achieve these policy requirements.*

4 There is clearly a contradiction between the policy wording and supporting text. In order to determine whether higher rates of affordable housing could be provided in a scheme, as required by the policy, a viability test would be required for every scheme subject to an affordable housing requirement. However, the supporting text wording clearly says that no individual assessment will be required if the policy requirement is met.

5 Furthermore, the policy should not specify minimum requirements as some schemes may not be able to achieve the "minimum" if other cost requirements, for example remediation of contamination, impact on viability. In addition, the Draft CIL charging schedule proposes a levy of £200 per sq m on residential development which could impact schemes – bearing in mind that the levy is calculated on "typical typologies" and is not scheme specific.

6 Suggested amendment to Policy H10 wording: (MM5.21)

affordable housing is provided in accordance with Table 5.4. ~~as a minimum. Higher rates of provision will be sought where development viability is not compromised~~

7 Suggested amendment to Paragraph 5.22 wording: (MM5.22)

Based on viability evidence prepared in support of the Local Plan, developments within York are expected to provide the target ~~minimum~~ levels of affordable homes set out in Policy H10. Therefore, no individual assessment will be required where proposals achieve these policy requirements.

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #435

COMPLETE

Started:	Monday, March 27, 2023 7:57:20 PM
Last Modified:	Monday, March 27, 2023 7:58:08 PM
Time Spent:	00:00:47
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

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Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.22 Policy H10 explanation

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link COPY 459 responses

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

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Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See representation in attached document

Chartered Town Planning Consultants

Modification Ref: **MM5.21; MM5.22**

Representation on behalf Galtres Garden Village Development Company

*(For information, our comments will reference our previous representations made at Submission Stage in 2018 and representations on the modifications in 2019 and 2021. Galtres identification number is **SID 620)***

1 We object to the proposed modifications.

2 Paragraph i. of modified Policy H10 states:

> *affordable housing is provided in accordance with Table 5.4 as a minimum. Higher rates of provision will be sought where development viability is not compromised.*

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> *Based on viability evidence prepared in support of the Local Plan, developments within York are expected to provide minimum levels of affordable homes set out in Policy H10. Therefore, no individual assessment will be required where proposals achieve these policy requirements.*

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6 Suggested amendment to Policy H10 wording: (MM5.21)

affordable housing is provided in accordance with Table 5.4. ~~as a minimum. Higher rates of provision will be sought where development viability is not compromised~~

7 Suggested amendment to Paragraph 5.22 wording: (MM5.22)

Based on viability evidence prepared in support of the Local Plan, developments within York are expected to provide the target ~~minimum~~ levels of affordable homes set out in Policy H10. Therefore, no individual assessment will be required where proposals achieve these policy requirements.

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS INDIVIDUAL RESPONSES

All Pages

Respondent #438

INCOMPLETE

Started:	Monday, March 27, 2023 7:58:47 PM
Last Modified:	Monday, March 27, 2023 7:59:23 PM
Time Spent:	00:00:35
IP Address:	188.65.102.133

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Eamonn Keogh

Q3

Contact details:Please provide email and/or address

Organisation (optional)	O'Neill Associates
Address	Lancaster House
Address 2	James Nicolson Link
City/town	York
Post code	YO31 8HN
Email address	[redacted]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link [redacted] COPY

459 responses

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Q6

To which section does this response relate?

Section 10: Managing Development in the Green Belt

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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[redacted]

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

MM10.3 Policy GB1 Explanation – new paragraph

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See attached representation document

Chartered Town Planning Consultants

Modification Ref: **MM10.3**

Representation by O'Neill Associates

1 We object to the proposed modification.

2 The modification is contradictory. On the one hand it refers to the importance of gaps in built frontages and later refers to the desirability of consolidating groups of houses which are isolated from the main body of a village.

3 Overall, the modification seeks to interpret what is, or what is meant by infill. However, as presented in the NPPF, the assessment of whether a proposal would constitute infill development is matter of interpretation on merits of each case.

4 The modification is not compliant with the NPPF.

Suggested Change

5 MM10.3 should be **deleted** in its entirety.

Lancaster House | James Nicolson Link | Clifton Moor | York YO30 4GR | 01904 692313
www.oneill-associates.co.uk