

## **EXECUTIVE - SPECIAL**

Date: Monday 19 December 2022

Time: 5.30 pm

Venue: Rennes Room, Civic Centre, Paris Street, Exeter

Members are invited to attend the above meeting to consider the items of business.

If you have an enquiry regarding any items on this agenda, please contact Mark Devin, Democratic Services Team Leader on 01392 265477.

Entry to the Civic Centre can be gained through the rear entrance, located at the back of the Customer Service Centre, Paris Street.

### *Membership -*

Councillors Bialyk (Chair), Wright (Deputy Chair), Denning, Ghusain, Morse, Parkhouse, Pearce, Williams and Wood

## **Agenda**

### **Part I: Items suggested for discussion with the press and public present**

#### **1 Apologies**

To receive apologies for absence from Committee members.

#### **2 Declarations of Interest**

Councillors are reminded of the need to declare any disclosable pecuniary interests that relate to business on the agenda and which have not already been included in the register of interests, before any discussion takes place on the item. Unless the interest is sensitive, you must also disclose the nature of the interest. In accordance with the Council's Code of Conduct, you must then leave the room and must not participate in any further discussion of the item.

Councillors requiring clarification should seek the advice of the Monitoring Officer prior to the day of the meeting.

#### **3 Local Government (Access to Information) Act 1985 - Exclusion of Press and Public**

It is considered that the Committee would be unlikely to exclude the press and public during consideration of any of the items on the agenda, but if it should wish to do so, the following resolution should be passed:-

**RECOMMENDED** that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the consideration of the particular item(s) on the grounds that it (they) involve(s) the likely disclosure

of exempt information as defined in the relevant paragraphs of Part 1, Schedule 12A of the Act

#### **4 Call in of Executive Decision - Community Infrastructure Levy: Partial Review Consultation**

Minute No. 124 of the Executive of 29 November 2022, on the Community Infrastructure Levy: Partial Review Consultation was called in by seven Scrutiny Members in accordance with Standing Order No. 17. The report was considered at a Special meeting of the Strategic Scrutiny Committee 12 December 2022, and the result of that meeting will be reported to the Executive.

(Pages 3 -  
130)

#### **Date of Next Meeting**

The next scheduled meeting of the Executive will be held on **Tuesday 10 January 2023** at 5.30 pm in the Civic Centre.

**A statement of the executive decisions taken at this meeting will be produced and published on the Council website as soon as reasonably practicable.**

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## REPORT TO EXECUTIVE

Date of Meeting: 29 November 2022

Report of: Director of City Development

Title: Community Infrastructure Levy: Partial Review consultation

### Is this a Key Decision?

No

### Is this an Executive or Council Function?

Executive

### 1. What is the report about?

The report explains the progress made on a partial review of the Council's Community Infrastructure Levy (CIL) Charging Schedule - the document which identifies the CIL rates to be charged on different types of development. The reports seeks approval to consult on a draft charging schedule from December 2022 and, depending on the nature of the responses and any revisions, submit for examination.

### 2. Recommendations:

2.1 That the Executive approves the Draft Charging Schedule (Appendix A) and supporting evidence (Appendix B and Appendix C) as the basis for public consultation for six weeks commencing in December 2022;

2.2 That the Executive gives delegated authority to the Director of City Development, in consultation with the Council Leader, to agree minor changes to the Draft Charging Schedule (Appendix A) before it is published for consultation;

2.3 That the Executive approves the submission of the Draft Charging Schedule (Appendix A), supporting evidence (Appendix B and Appendix C), consultation responses and other information as may be required, to enable an independent examination on the Draft Charging Schedule to take place, subject to there being no revisions to the proposed CIL charges following consultation; and

2.4 That if further revisions to the CIL charges are proposed following consultation, an updated draft will be brought to Executive in advance of submission for examination.

### 3. Reasons for the recommendation:

3.1 As the Local Planning Authority and Community Infrastructure Levy (CIL) Charging Authority for Exeter, the City Council has the authority to charge CIL in the city. The City Council has been charging CIL since December 2013. In the intervening nine years there have been significant changes in the city and the development industry which means the current CIL charges in the City should be reviewed.

3.2 The City Council and consultants have undertaken significant evidence work and assessment to prepare a draft Charging Schedule which proposes a series of revised CIL charges for development in the city. Not all of the current charges are proposed to be revised and as such the review is only 'partial'.

3.3 Consultation is a statutory requirement of the CIL process. The consultation will enable to provide comments on the draft Charging Schedule and supporting evidence.

#### **4. What are the resource implications including non-financial resources**

4.1 The budget required to prepare a draft Charging Schedule, and to commission consultants, was agreed by Council in July 2019. The recommendations made in this report result in no direct or additional resource implications at this stage because the recommended next step is a consultation.

4.2 If, following consultation and examination, the rates in the draft Charging Schedule were taken forward to implementation, there would be a potential impact on CIL revenue. However, CIL revenue is wholly reliant on the activity of the development industry which brings forward the projects which pay CIL and it would take some time for the full implications of the revised CIL rates to take effect. Once established, it is anticipated that future annual CIL revenues generated by the new rates would be comparable to those related to charges in the current Charging Schedule. These charges have historically generated between £2.5 and £4.5m per annum depending on the rate of development.

#### **5. Section 151 Officer comments:**

5.1 Whilst there are no specific financial implications for Council to consider in this report, CIL is an important funding stream for Council's to deliver or maintain the infrastructure required to for new developments to integrate into the City.

#### **6. What are the legal aspects?**

This report seeks approval to hold a consultation on a Draft CIL Charging Schedule to comply with the provisions of the Community Infrastructure Levy Regulations, 2010, Part 3, Regulation 16 and the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019.

#### **7. Monitoring Officer's comments:**

Given that local authorities are obliged to consult on the proposed charging schedule, the Monitoring Officers is happy to support the recommendation.

#### **8. Report details:**

##### Background

8.1 The City Council implemented CIL in 2013 and currently charges for residential development, purpose built student accommodation and retail outside of the city centre. The current charges are set out in the [existing Charging Schedule](#) which is available online.

8.2 Over time, the CIL rates have been uplifted to take account of indexation. The [current charges including indexation](#) are available:

8.3 The Council has previously agreed to undertake a partial review of the City Council's CIL Charging Schedule. This review will take account of changes to development viability and the evolving maturity of some forms of development in the city.

#### Evidence base for the CIL Charging Schedule partial review

8.4 A significant amount of work has been undertaken to provide an evidence base for the CIL review. More information on the supporting evidence is included in the Appendices but in summary it includes:

- Engagement with the local development industry and the wider planning team to inform assumptions for a viability assessment.
- An assessment of policy requirements and their costs within the development process.
- A viability assessment process to determine which CIL rates could be appropriate for different development types.
- An updated infrastructure delivery plan (IDP).

This evidence is documented in Appendix B, a general background document and infrastructure delivery plan, and Appendix C, a viability report.

8.5 It should be noted that this IDP is an update of a previous document which covers the period to 2026 which is the end date of the adopted Core Strategy. This is the document which the revised CIL regime would be linked to. This is not a list of infrastructure for the emerging Exeter Plan – An Exeter Plan IDP will be produced in 2023 covering the period up to 2040.

#### Proposed CIL rates for consultation

8.6 The work undertaken has led to a revised series of CIL rates which are being proposed for consultation. These are listed in Table 1 alongside the current rates.

Development use	Levy (per sq m)	Notes
Residential (excluding Use Class C2, flats, build to rent, purpose built student accommodation and co-living)	£80	No change. This rate is from the October 2013 Charging Schedule. This is currently indexed to £118.57
Flatted residential	£0	New rate for 2022 Draft Charging Schedule. Currently charged the wider residential rate.
Build to Rent	£50	New rate for 2022 Draft Charging Schedule. Currently charged the wider residential rate.
Purpose built student accommodation (PBSA)	£150	New rate for 2022 Draft Charging Schedule. The current Charging Schedule includes a rate of £40 currently indexed to £59.29.
Co-living	£50	New rate for 2022 Draft Charging Schedule. Currently not charged CIL.
Retail outside city centre	£125	No change. Part of October 2013 Charging Schedule. This is currently indexed to £185.27
All other development	£0	No change.

**Table 1: Proposed CIL rates for consultation**

Consultation details:

8.7 The CIL consultation will be undertaken in accordance with the Community Infrastructure Regulations 2010, the City Council's recently adopted Statement of Community Involvement and the Consultation Charter.

8.8 On this basis, the draft Charging Schedule and the supporting evidence in the Appendices to this report, together with a Statement of Representations Procedure, will be made available for public comment.

8.9 The material will be made available at the reception of the Civic Centre and the libraries in the city and will also be published online. The consultation will be advertised locally. Contact will also be made with Devon County Council, adjoining Local Planning Authorities and other stakeholders as necessary.

8.10 The consultation will run for six weeks in December 2022 and January 2023.

8.11 The CIL is a technical area of work and therefore, although available publically, the consultation will be focused on the development industry, stakeholders and anyone with a specific interest in the subject.

## After the consultation

8.12 After the consultation, and subject to the responses received, the draft CIL Charging Schedule, the associated evidence and the responses received will be submitted for examination. An examination will then be arranged to enable interested parties to discuss the CIL charges with an appropriately appointed independent examiner. The examiners will then be published before the City Council has regard to the findings. If the CIL rates are considered appropriate through the examination process the City Council can approve and then implement the new Charging Schedule and the rates included within it.

## **9. How does the decision contribute to the Council's Corporate Plan?**

9.1 The consultation on the CIL Draft Charging Schedule will play a role in supporting the three corporate objectives set out in the Council's Corporate Plan. It will contribute to the aspirations of the Exeter Vision 2040 by helping to progress the new establishment of a new CIL regime in Exeter which will provide funding to support growth, shape places and deliver infrastructure and community services related to development.

9.2 In doing so the new CIL regime will help to deliver the City Council's strategic priorities of a prosperous local economy through improving Exeter as place to attract investment. It will also enable investment in infrastructure and services which improve health and activity in the city and support place-making, housing delivery, building neighbourhoods and communities. Finally the CIL regime will support the progress towards a new zero carbon city by taking into account sustainable construction requirements when setting appropriate CIL rates.

## **10. What risks are there and how can they be reduced?**

10.1 The recommendations in this report relate to consultation and the submission of the Draft CIL Charging Schedule for examination. There are no specific decisions to be made at this stage about the implementation of the revised CIL charges. The costs of the CIL review have already been agreed by Council in 2019. On this basis, the risks associated with the recommendations are minimal.

10.2 Looking beyond the specific subject of this report to the point at which an examiner makes conclusions regarding the proposed CIL rates, if at that point, the City Council did not consider it appropriate to implement the revised rates, the current CIL charges would remain.

## **11. Equality Act 2010 (The Act)**

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- Eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- Advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- Foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act and an Equalities Impact Assessment has been included in the background papers for Members' attention.

## **12 Carbon footprint (environmental) implications**

There are no significant and direct carbon/environmental impacts arising from the recommendations. However, the proposed CIL charges for consultation have been developed in the context of potential costs associated with sustainable construction requirements to ensure that the CIL rates do not undermine the ability to deliver these environmental policy aspirations.

## **13 Are there any other options?**

The recommendations in this report respond to statutory requirements for CIL Charging Authorities (including the City Council); to undertake consultation on a Draft Charging Schedule and for the Draft Charging Schedule to be submitted for Examination. There are therefore no other options if pursuing a CIL regime.

**Director of City Development, Ian Collinson**

Author: George Marshall: Assistant Service Lead – Local Plans

## **Local Government (Access to Information) Act 1972 (as amended)**

Background papers used in compiling this report:-

[Current CIL Charging Schedule:](#)

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# Exeter Community Infrastructure Levy: Partial review Draft charging schedule



Consultation version  
December 2022



**Exeter**  
City Council

**Community Infrastructure Levy  
Draft Charging Schedule**

December 2022

For consultation

DRAFT

**Section 211(1), Planning Act 2008 (as amended)**

**Part 3, CIL Regulations 2010 (as amended)**

**1 The Charging Authority**

Exeter City Council is the 'Charging Authority'

**2 Date of approval**

This Charging Schedule was approved by the Council on DAY/MONTH/YEAR: To be added in future

**3 Date that effect**

This charging schedule will come into effect on DAY/MONTH/YEAR: To be added in future

**4 CIL rates**

The Council intends to charge different rates of CIL according to the land use of a proposed development (expressed as pounds per square metre) and by the area where a proposed development is situated, as set out in Table 1. The rates will generally be levied against the gross internal floor area of all new dwellings/residential units (irrespective of size) and all other new development exceeding 100 square metres. There are exemptions for affordable housing custom and self-build proposals, buildings into which people do not normally go and buildings used by charities.

**Table 1 CIL rates**

<b>Development Use</b>	<b>Levy (per sq m)</b>	<b>Notes</b>
Residential (excluding Use Class C2 and residential uses identified below as flatted, build to rent, purpose build student accommodation and co-living)	£80*	<i>Part of October 2013 Charging Schedule - indexed to £118.57 for permission granted in 2022</i>
Flatted residential – homes with neighbouring uses above and/or below	£0	<i>New rate for 2022 Draft Charging Schedule</i>
Build to Rent – purpose built housing, rented out and professionally managed in single ownership and management control	£50	<i>New rate for 2022 Draft Charging Schedule</i>
Purpose built student accommodation (PBSA) - student housing whose occupation is limited to students by planning permission or planning obligation	£150	<i>New rate for 2022 Draft Charging Schedule</i>
Co-living – purpose built managed rental accommodation comprising private living units with communal facilities, under professional management	£50	<i>New rate for 2022 Draft Charging Schedule</i>
Retail (includes former Use Classes A1–A5†) outside the city centre:	£125*	<i>Part of October 2013 Charging Schedule - indexed to £185.27 for permission granted in 2022</i>
All other development	£0*	

\* Rates that are not amended as part of the Partial Review of the CIL Charging Schedule will be indexed for inflation in accordance with the CIL Regulations 2010 (as amended) based on the date of their original effect in the original CIL Charging Schedule (October 2013) to the date of final approval (expected 2023). The updated indexed figures will be provided as part of the final reviewed CIL Charging Schedule at the point of final approval (expected 2023) rather than in this Draft Charging Schedule document.

†: Retail is defined as uses that fall within Classes A1, A2, A3, A4 and A5 of the Town and Country Planning (Use Classes) Order 1987 as amended, or any other order altering, amending or varying that Order, and related sui generis uses

In accordance with Government guidance, the rates have been set on the basis of the intended use of development. The definition of ‘use’ for this purpose is not tied to the classes of development in the Town and Country Planning Act (Use Classes)

Order 1987 (as amended) although reference has been made in Table 1 to use classes in that Order to provide a useful reference point. Therefore the reference made to the use classes is not limited to those use classes.

## **5 Charging zones**

Charging Zones are set out in the accompanying map at Figure 1. The Exeter Local Plan First Review City Centre Inset Map provides a more detailed definition of the city centre which is used to determine retail charges. It is available from:

[http://pub.exeter.gov.uk/asp/local\\_plan/map\\_htm/city/city\\_072.htm](http://pub.exeter.gov.uk/asp/local_plan/map_htm/city/city_072.htm) ,

## **6 How the chargeable amount will be calculated**

The amount to be charged for each development will be calculated in accordance with Schedule 1 of the Community Infrastructure Levy Regulations 2010 (as amended). For the purposes of the formulae in Schedule 1, the relevant rate (R) is the rate for each charging zone/use shown in Table 1.

## **7 Statutory compliance**

The Charging Schedule will be issued, approved and published in accordance with the CIL Regulations 2010 (as amended) and Part 11 of the Planning Act 2008 (as amended).

## **8 Further information**

Further information on the Community Infrastructure Levy is available on the Council's website:

<https://exeter.gov.uk/planning-services/payments-from-developers/community-infrastructure-levy-cil/what-is-the-cil/>

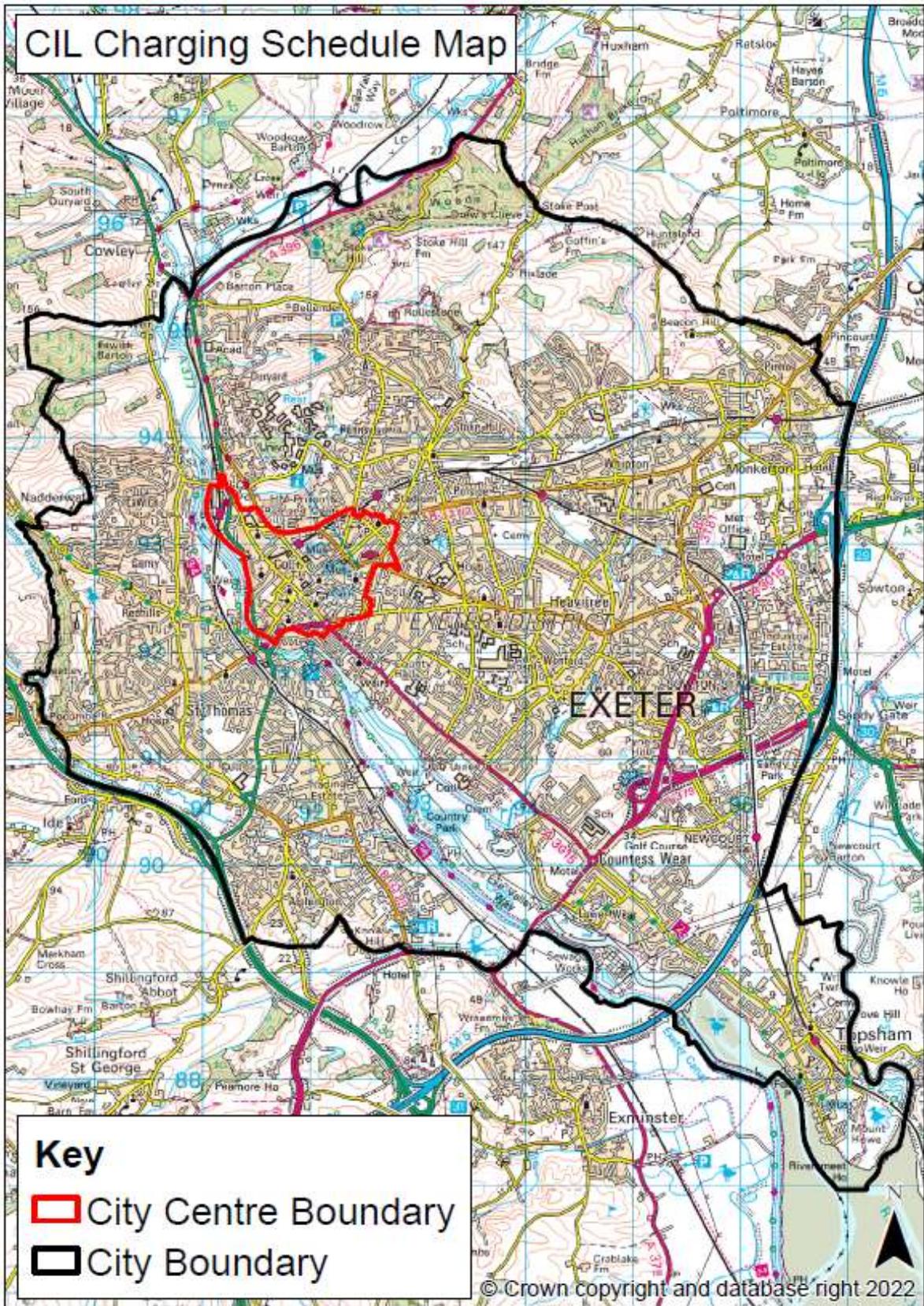


Figure 1 Community Infrastructure Levy Charging Zones



## Community Infrastructure Levy Draft Charging Schedule

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December 2022

# Exeter Community Infrastructure Levy: Partial review Draft charging schedule



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Exeter City Council - CIL Partial Review

## Background information

Document 1 – November 2022

Three Dragons



<b>Document control sheet</b>	
<b>Project name</b>	Exeter City CIL Partial Review 2022
<b>Project reference</b>	CIL Review
<b>Report title</b>	Background information
<b>Doc ref</b>	Document 1
<b>Date</b>	November 2022
<b>Prepared by</b>	Paul Dunnell, Mark Felgate & Dominic Houston
<b>Reviewed by</b>	Tom Marshall & Lin Cousins
<b>Quality statement</b>	In preparing this report, the authors have followed national and professional standards, acted with objectivity, impartially, without interference and with reference to appropriate available sources of information. No performance-related or contingent fees have been agreed and there is no known conflict of interest in advising the client group.
<b>Use of this report</b>	No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.

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## Chapter 1 Purpose of the partial review

### Context

- 1.1** Exeter City Council was one of the first local authorities in England to introduce CIL. Since its introduction in 2013 over £20m has been collected, which has been used to fund a range of local and strategic infrastructure projects.
- 1.2** CIL is currently charged at different levels per sq/m for different uses and areas as set out in the charging schedule (see appendix A for the current Charging Schedule). The current rates (as indexed for 2021/2022) are as follows:
- Residential - £118.57 per sqm of liable development
  - Purpose built student accommodation - £59.29 per sqm of liable development
  - Out of city centre retail - £185.27 per sqm of liable development
  - All other development - £zero
- 1.3** The rates were subject to a CIL Examination process and the supporting viability evidence at that time was found to be robust and able to demonstrate that retail development (outside the city centre) was the most viable development form, attracting the highest rates, with residential development and purpose built student accommodation also sufficiently viable for a charge but at lower rates to the retail charge. All other development was zero rated for CIL. The Examiner supported Exeter's proposals and the Council agreed the commencement of CIL charging in December 2013.
- 1.4** The Council is currently preparing a new local plan called the Exeter Plan. The timetable for the new local plan would mean that any related CIL review linked to the new Local Plan and its policies would not be in place for at least 10 years after the original introduction of CIL.
- 1.5** During this time, whilst annual indexing of the CIL rates have meant that the rates as agreed in 2013 have kept pace with the market, there has been no adjustment to how they are applied, especially in relation to the types of uses.
- 1.6** The Council recognises that since the CIL was brought in there have been changes and new products in the local property market that were not envisaged when the rates were originally set, where the focus was on edge of settlement house led schemes and to a lesser extent new retail development. In particular, the following development uses have been identified for review:
- Flatted development (for sale) – currently this is included within the standard residential rate. The standard residential rate was largely based on greenfield house led typologies, which at the time was the dominant form of supply and therefore rightly the driver for CIL rates. Since this time as the greenfield sites have been built out there is more reliance on brownfield flatted development to contribute to supply. As this form of development becomes more important the Council need to consider whether the 'all residential' CIL rate is putting at risk delivery of plan policy. Whilst not a viability test, it has been suggested anecdotally that relatively few new build flat led schemes come forward in Exeter and that the CIL rate could be one of the factors effecting delivery.

- Flatted development Build to Rent (BtR) – At the time of the 2013 CIL, BtR was in its infancy in London. Since then it has gained in popularity, first into the larger metropolitan areas such as Greater Manchester and more recently to a wider range of cities and towns. At present BtR would be subject to the standard ‘all residential’ rate. There is at least one BtR example in Exeter and the Council understands that there is a growing interest in this type of development use. As the development model/viability approach is different and the offer is different<sup>1</sup> to traditional sale and standard private rent it is considered that it is a different intended use and therefore reasonable to consider it separately for any potential CIL. Furthermore, due to the different delivery model the resultant land value uplift could potentially be different from traditional sale models, thus providing further evidence to support a differential rate as per para 25 in section 25 PPG<sup>2</sup>, noting this also supports differential rates for flat and co-living schemes.
- Co-living – like BtR, co-living is a new entrant to the Exeter market, with two schemes approved and others coming forward. At present co-living is not considered as residential or purpose built student accommodation (although it does share some characteristics with the latter) and therefore is within the ‘all other development’ types rate of £zero. Given its specific characteristics and acknowledged difference to others types of development it is considered that is reasonable to test as its own ‘intended use’ in terms of CIL charging.
- Purpose built student accommodation (PBSA) – this already has its own rate but at the time it was set there were only limited examples from within Exeter of this form of development. There are now around 11,500 bed spaces within PBSA at the University campus and the wider area and another 1,300 bed spaces in the pipeline<sup>3</sup>. With around 25,000 students at the University, this suggests that only just under half are within PBSA, so there is still significant scope for future development. This is evidenced by the continuing existence of significant numbers of houses in multiple occupation in the city and the ongoing review of the associated Article 4 Direction. Also, it is understood that outside the University campus the form of student accommodation has changed with a greater level of ‘studio’ as opposed to ‘cluster’ flats coming forward as well as more communal space. Within the University, cluster flats are still preferred, rents are determined by the University rather than the market and there is aspiration for higher building standards. Due to all these changes to the form of development and the more extensive evidence base since the CIL was first sought it is considered appropriate to reconsider the CIL rate as part of this partial review.

**1.7** Therefore the Council has decided to move forward with a partial review of CIL rates, specifically related to those areas of change in the local market. This will enable these types of uses to be considered and proposed rates put forward. It is important to note that whilst assumptions will be brought up to date, the primary policy context will be that of the current adopted local plan. The partial review will not preclude or prejudice a full review when account can be taken of new or revised policies within the emerging new Exeter Plan.

## Legislative requirements and guidance

**1.8** Section 45, para 25, PPG states that “Charging authorities must keep their charging schedules

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<sup>1</sup> As recognised by the NPPF, with further guidance in PPG section 60 referencing differences such as 3 year tenancies, with options for the local authority to control this use through S106 – see <https://www.gov.uk/guidance/build-to-rent>

<sup>2</sup> <https://www.gov.uk/guidance/community-infrastructure-levy#charging-schedules-and-rates> - Paragraph: 025 Reference ID: 25-025-20190901

<sup>3</sup> Figures from ECC estimation April 2021

under review and should ensure that levy charges remain appropriate over time. For example, charging schedules should take account of changes in market conditions...Charging authorities may revise their charging schedule in whole or in part. Any revisions must follow the same processes as the preparation, examination, approval and publication of a charging schedule (as specified under the Planning Act 2008, particularly sections 211 to 214 as amended by the Localism Act 2011, and the levy Regulations)."<sup>4</sup>

- 1.9** Therefore, it is acceptable to undertake a partial review of CIL based on the circumstances in respect of specified uses as described para 1.5. It is up to the Council to decide when to undertake any review as this is not prescribed either in law or guidance.
- 1.10** In terms of process the 2019 Regulations removed the requirement to consult on a preliminary draft charging schedule. However, the Council has undertaken stakeholder consultation in respect of the assumptions used to inform the viability testing, with stakeholders who are involved with the forms of development subject to this partial review (see appendix B for further details). There is still the formal requirement to consult on the Draft Charging Schedule, although the form and the time provided to respond to the consultation is up to the local authority as per regulation 16 of the 2010 CIL regulations (as amended).
- 1.11** In respect of setting rates the CIL regulations (14) specify that "In setting rates (including differential rates) in a charging schedule, a charging authority must strike an appropriate balance between:
- (a) the desirability of funding from CIL (in whole or in part) the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding; and
  - (b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area."

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<sup>4</sup> PPG Paragraph: 045 Reference ID: 25-045-20190901

## Chapter 2 Infrastructure evidence

### Context

- 2.1** Charging authorities must identify the total cost of infrastructure they wish to fund wholly or partly through the levy. In doing so, they must consider what additional infrastructure is needed in their area to support development, and what other sources of funding are available, based on appropriate evidence.
- 2.2** Information on the charging authority area's infrastructure needs should be drawn from the infrastructure assessment that was undertaken when preparing the relevant plan (Exeter City Core Strategy) and the CIL charging schedule.
- 2.3** From December 2020, local authorities must publish an infrastructure funding statement, and infrastructure planning information should be drawn from this and other relevant work. This will help the charging authority to identify the infrastructure funding gap and a levy funding target.

### Infrastructure funding requirements

- 2.4** The submission of the current charging schedule was accompanied by an Infrastructure Delivery Plan (as updated) to help demonstrate that there was need to raise a CIL to fund infrastructure to support new development. The work prepared for the CIL examination in 2013 identified a funding gap of around £92 million until 2026. During this period, it was estimated that approximately £39m of CIL might be raised with the current rates. Therefore, there was and continues to be a significant infrastructure-funding shortfall, which can only be partially addressed through the CIL.
- 2.5** A more recent review of infrastructure requirements has been undertaken to support this partial review of CIL. This alongside the infrastructure funding statement shows that a large number infrastructure projects continue to require funding. Exeter City Council has updated the Infrastructure Delivery Plan which sets out a list of the infrastructure required in the remaining period up to 2026 and identifies where CIL could be used to provide such funding alongside other sources. The updated Infrastructure Delivery Plan identifies a total cost for infrastructure arising from the Core Strategy, from 2022 until the end of the plan period in 2026 of £180m and a funding gap of £93m. The revised IDP notes that some projects have been delivered, that there are new cost specifications for some projects and that there has been a general increase in costs since the Core Strategy was adopted in 2012. The revised IDP figures include some historic costs indexed to 2022 prices (indexed using BCIS AITPI) and revised costs supplied by service providers. Please see Appendix C for a full list of projects and costs.

## Chapter 3 Viability evidence

### Approach

- 3.1** As explained in chapter 1 since the Exeter City charging schedule was introduced in 2013, there has been a change in the type and form of residential development likely to come forward in the future in Exeter. The current CIL rates are based on viability research carried out 2011-2013 and have an emphasis on standard for sale housebuilding and retail uses.
- 3.2** The Council has commissioned Three Dragons to carry out research to ascertain whether residential uses should be subject to a differential charge, based on viability and whether PBSA rates are appropriate in terms of the balance to fund infrastructure and viable delivery.
- 3.3** Three Dragons' key findings are that:
- There is viability evidence to support increasing current PBSA rate to £150/sqm
  - The review of delivery and viability found that there is potential for:
  - A new charge of £50/sqm is introduced for co-living schemes
  - A new charge of £50/sqm is introduced for Build to Rent (as defined in NPPF)
  - A new charge of £0/sqm is introduced 'for sale' Flats development (not considered as BtR)
  - The definition within a new charging schedule for 'all residential' development is amended to remove flats and BtR
- 3.4** For further details please see Exeter CIL Partial Review – Document 2 – Viability evidence base.
- 3.5** The other rates that have not been considered as part of this partial review ('residential' for remaining types of development not considered above, 'retail' and 'other' will continue and be indexed as per current regulations.

### Potential future CIL receipts

- 3.6** Based on the proposed charging rates set out in para 3.3 and those rates that will continue to be charged (as indexed) and potential housing and other chargeable development delivery<sup>5</sup>, it is estimated that for the remaining plan period (to 2026) Exeter City Council could potentially receive £25m CIL revenue.

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<sup>5</sup> This includes 780 houses, 2,000 PBSA bed spaces, 700 co-living bed spaces, 400 BtR units and 14,000 sqm retail.

## Chapter 4 Charging schedule, consultation & examination

### Revised charging schedule

- 4.1** The Exeter City CIL revised charging schedule is similar to the current version but following the partial review there are now proposed differential rates for some forms of residential type development, a proposed increase in the rate for PBSA and a new charge for co-living schemes.
- 4.2** Details of the new rates are in the revised draft charging schedule – it is proposed that these new rates would be charged alongside the existing rates (as indexed) for all other forms of residential uses, retail use (as defined) and all other forms of development not specified within the individual rates.

### CIL Relief and Exemptions

- 4.3** These would remain the same as for the previous schedule. The regulations provide 100% relief from the levy on those parts of a chargeable development, which are intended to be used for affordable housing as defined in the CIL regulations and custom and self-build housing. A charity landowner can also benefit from full relief of CIL if the building will be used wholly, or mainly, for charitable purposes. Exeter City does not offer discretionary relief from the CIL.

### Instalments Policy

- 4.4** This will remain the same as for the current schedule.

### Consultation

- 4.5** As set out para 1.9 the Council are required to formally consult on the draft charging schedule. Whilst there is no defined consultation period it is considered that the timeframe should be consistent with other statutory planning policy consultations which allow for 6 weeks.
- 4.6** This consultation seeks your views of Exeter City proposed charging schedule as revised. If you would like to make comments on the schedule please send any comments to:
- TBC
  - Please send your comments by TBC
  - Hard copies of the consultation documents are available to view at TBC

### Examination in Public

- 4.7** Exeter City Council will consider your comments and may amend its proposals in the light of any views expressed or evidence presented. Any comments received together with the Exeter City CIL proposals will be presented to an Examination in Public by an independent Examiner in line with procedures set out in the CIL regulations.

## Appendix A – Current Charging Schedule



### Community Infrastructure Levy Charging Schedule

Approved on 15 October 2013

### Levy Rates

The rates below will generally be levied against the gross internal floor area of all new dwellings (irrespective of size) and all other new development exceeding 100 square metres. There are exemptions for buildings into which people do not normally go and buildings used by charities. Relief is also available for social housing.

Development Use	Levy (per sq m)
Residential (excluding Use Class C2)	£80
Student housing whose occupation is limited by planning permission or planning obligation	£40
Retail (includes Use Classes A1–A5) outside city centre	£125
All other development	£Zero

### Charging Zones

Charging Zones are set out in the map below. The Exeter Local Plan First Review City Centre Inset Map provides a more detailed version and is available from [www.exeter.gov.uk/planning](http://www.exeter.gov.uk/planning) or the Civic Centre, Paris Street Exeter, EX11JN.

### How the Chargeable Amount will be calculated

Where applicable the Council will issue a Liability Notice that states the chargeable amount as soon as possible after the grant of planning permission. The Council will calculate the amount of CIL chargeable to a qualifying development utilising the formulae set out in Parts 5 and 6 of the CIL Regulations. In summary the amount of CIL chargeable will be calculated as follows:

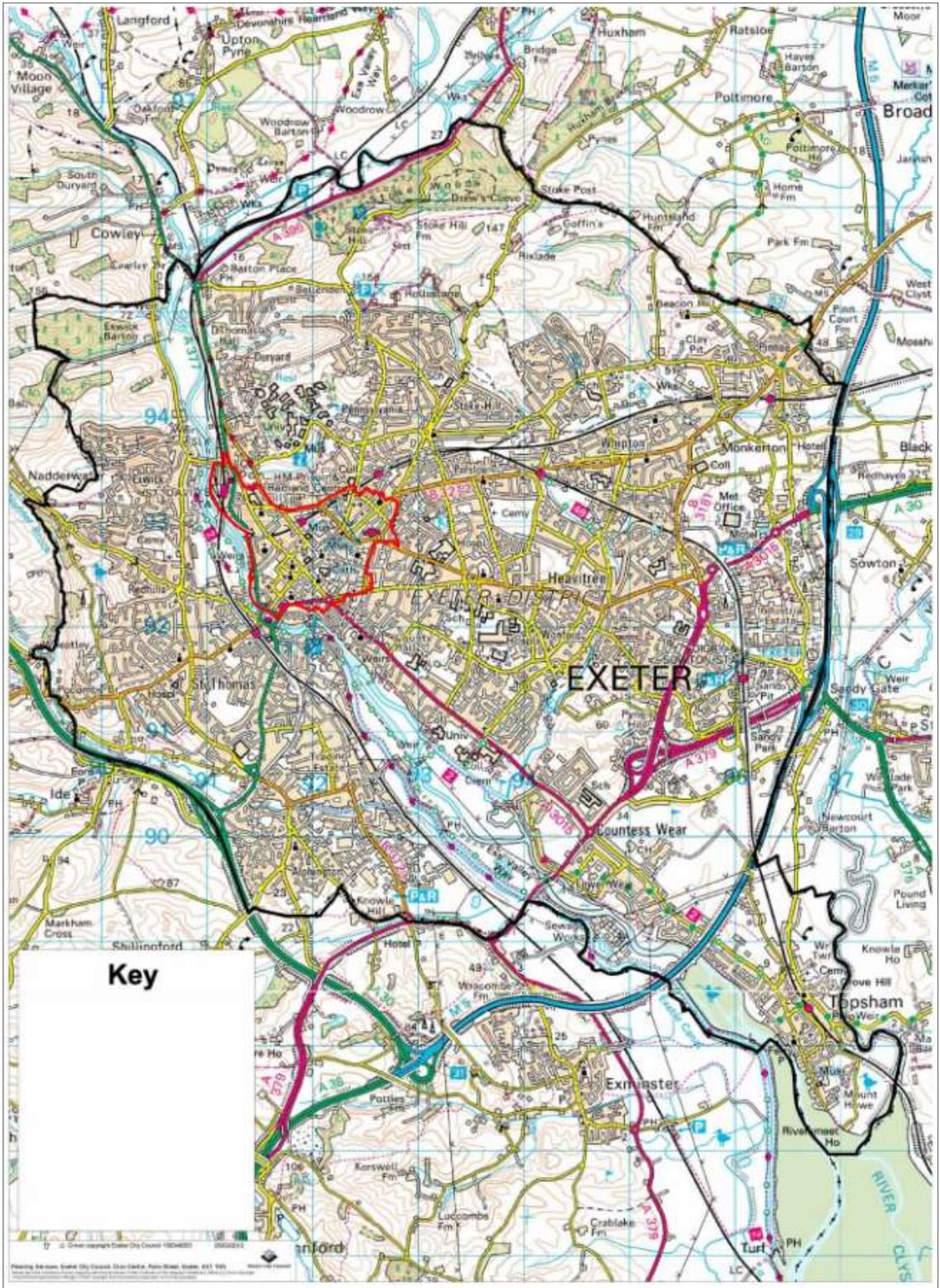
$$\frac{\text{CIL Rate} \times \text{Chargeable Floor Area} \times \text{BCIS Tender Price Index (P)}}{\text{BCIS Tender Price Index (S)}}$$

P = The BCIS Tender Price Index published on 1<sup>st</sup> November of the year preceding the grant of planning permission

S = The BCIS Tender Price Index published on 1<sup>st</sup> November of the year preceding Charging Schedule adoption

The Chargeable Floor Area makes allowance for previous development on the site. The net chargeable floor area amounts to the gross internal area of the chargeable development less the gross internal area of any existing buildings that qualify for exemption on the site.

This summary does not take account of every aspect of the CIL Regulations, which are available to view at the Council's website ([www.exeter.gov.uk/planning](http://www.exeter.gov.uk/planning)) or at the Civic Centre, Monday to Friday: 08:30 – 17:00.





Community Infrastructure Levy  
Charging Schedule

Exeter City Council  
Civic Centre Paris  
Street Exeter  
EX1 1NN  
Tel: 01392 265223  
Fax: 01392 265431  
[www.exeter.gov.uk/planning](http://www.exeter.gov.uk/planning)

October 2013

## Appendix B – Consultation February/March 2022

- i. During February and March around 50 organisations were contacted via email with a covering email explaining the partial review of Exeter City Council's CIL. This mixture of developers, land promoters, council departments, agents and the County Council were sent a report outlining the partial review and potential assumptions to be used within the testing including typologies, form of development, values, costs and benchmark land values. Those contacted were invited to comment on the assumptions within a defined set of questions, either through written comments or as part of a telephone/video discussion.
- ii. Eight responses were received, representing a range of organisation, either through a written response or via a video/phone discussion from which notes were taken. Those who responded and a summary of the comments made as well as a response are set out below.
  - Global/Exeter City Futures
  - McLaren Property Ltd (Aspinall Verdi & Turley)
  - Grainger PLC
  - Exeter City Council property
  - Exeter Living
  - Tetrattech
  - McMurdo Client Group (McMurdo Land Planning Development)
  - Burrows Hutchinson

### Consultation responses

**Q1 – Do you agree with the proposed typologies in terms of their range within in development type and their form in terms of site area, density and storey height?**

**Q1a – If no to Q1 please suggest an alternative and provide evidence to support your view.**

**Table B1 – Typology, site size and density**

<b>Comment and / or query</b>	<b>Council/Three Dragons response</b>
All – There are no broad locations for the brownfield sites (i.e. central or suburban) and nothing around transport accessibility	It is not considered necessary for this type of study to specify site specific locations.
Flatted – brownfield densities look reasonable but would expected greenfield to be lower and with less storey height	If the site is suitable for lower densities then it is more likely it will come forward as housing.
Flatted – brownfield densities are too high, especially as there is a lack of applications to support.	Agree there limited examples of larger scale flatted development, which is why the council's early work on potential future developers has been used to inform the typologies.

Co-living – recent example (Gladstone Road) has a density of 512 studios per hectare which is lower than typology	The density for co-living has been reviewed, reflecting this comment.
BtR – densities look reasonable	Noted.
BtR – the unit numbers represent the smallest and largest sizes of site that are generally put forward for BtR schemes	Noted.
BtR – there could be an additional typology with a greater number of storeys as this could potentially come forward in Exeter in future years, suggestion of 8 to 12 storey height	An additional typology has been included to reflect this comment.
BtR – not normally a distinction between gross and net site area for BtR schemes – the net area will normally be sufficient to cover footprint and ancillary areas for parking (likely to be more limited in accessible locations) and landscaping	This has been amended for the BtR typologies and for consistency also the flatted typologies to reflect this comment

**Q2 – Do you agree with the proposed unit sizes, mix and tenures in terms of their range within in development type?**

**Q2a – If no to Q2 please suggest an alternative and provide evidence to support your view.**

**Table B2 – Unit size, mix and tenure**

<b>Comment and / or query</b>	<b>Council/Three Dragons response</b>
All – NDSS should be used for the basis of the dwelling sizes for flatted and BtR – transactional data may be biased to a certain size of flat or location	NDSS is used for the basis of the affordable housing unit sizes. It is a standard approach to market data to inform market sizes and has been informed by large number of transactions. As the market values data is based from the same information, these would need adjusting if NDSS was used.
All – flatted and BtR affordable should reflect the same unit sizes and should represent the same mix as the market dwellings	This is a strategic plan wide study and as these are flat only schemes, the average market £/sqm for flats is used (and not further defined by number of bedrooms).
All – the gross to net in terms of floorspace should changed from 85% to 75% to account bin and cycle storage	The 15% allowance for 3 – 5 storeys for non saleable space is considered appropriate and consistent with other similar studies. It is acknowledged that as storey height increases the figure will need to be higher and this is reflected in the increase to 20% for development over 5 storeys.

PBSA – GIA should be c28sqm with NIA for a cluster at c13.5sqm and for a studio c17sqm	Based on a review of recent schemes the testing has used a blended gross floorspace of 32 sqm per bed, which is conservatively above the suggested size.
PBSA units are much smaller than 32 sqm – recent schemes and applications should be used.	Comment misunderstands difference between gross and net and cluster and studio apartments. 32 sqm per bed is a blended gross rate.
PBSA – On-campus schemes undertake for the University will be all cluster flats rather than a mix of studios and cluster.	Testing has used a mix of studios and cluster flats based on the review of recent off-campus schemes.
Co-living – GIA should be c35.5sqm with NIA for a studio c17sqm	Based on a review of recent schemes the testing has used a blended gross floorspace of 35 sqm per bed.
BtR – Unit sizes tend to be a minimum space standard with a mixture of 1 to 3 bed units, presented blended figures maybe a little too high, suggested to use Exmouth Junction as an example mix	Floorspace has been reviewed and are similar to the standard market blended rate – however it accepted that the gross size may need to be adjusted – see below.
BtR - additional allowance of 15% for a 5 story building for non rentable space acceptable (i.e. stairwells, corridors, plant etc), however further allowance required specifically for BtR schemes to account for community space (workspaces, lounge, gamesroom etc), suggested that Exmouth Junction allowances used to inform figure	Application referenced just over 2sqm per unit for 'community space' – for modelling purposes this is rounded to 3sqm per unit, including the affordable discount market rent units.
BtR – Discount market rent more likely to be 1 and 2 bed units	Agreed - the blended rate in a mix of 2 person 1 bed and 4 person 2 bed.

**Q3 – Do you agree with the proposed values and underlying assumptions for each of the development types?**

**Q3a – If no to Q3 please suggest an alternative and provide evidence to support your view.**

**Table B3 – Values**

<b>Comment and / or query</b>	<b>Council/Three Dragons response</b>
Flatted – market values agreed	Noted
Flatted - shared ownership values agreed	Noted
Flatted - First Homes values agreed	Noted
Flatted – rented – no consideration of affordable rent and unclear as to the calculation for social rent	Affordable rent is not sought by Exeter City Council. Further explanation of social rents is provided in the main report.

Flatted – values vary across the city, city wide average is not the right approach.	Whilst values will vary, this is a strategic plan wide assessment and therefore approach is reasonable.
BtR – Presented rent is too high (post assumptions report note – please note that the figure shown for rent per annum at £1,700 in the assumptions report was incorrect, the correct figure was £1,400 per month)	Following further review the rents have been reduced to a blended rate of £1,250 per month, reflecting a wider range of sources including Rightmove, Home and Property Data and are within range of those suggested in the consultation.
BtR – Rent per month assumptions should range from £1,000 for a 1 bed up to around £1,500 per month for a 3 bed, therefore a blended rate of up to £1,400 is acceptable	See above
BtR – The allowance of 22.8% for management, sinking funds and voids is considered to low for an area with no current schemes and therefore limited potential for efficiency – figures between 25% and 27% would be more appropriate	Figure has been adjusted to 26% to reflect comment.
BtR – Capitalisation yield of 4.5% is keen and only about acceptable, though should improve once more established market.	Given the newness of the product in the market the yield has been increased slightly for testing purposes.
PBSA – values of £215 per week too high, £207 per week is more appropriate	Figures used in testing are based on review of rental data.
Co-living – accept that it is difficult to gauge what the rents will be as there are currently no operable schemes in Exeter – however don't think a 30% uplift on PBSA rates is acceptable within the Exeter area, given it is untested – suggest 5 to 10% is used.	Agree it is difficult to establish and have reduced the uplift on PBSA studio value to 10% to reflect the comment.

**Q4 – Do you agree with the proposed benchmark land values and underlying assumptions for each of the development types?**

**Q4a – Are these benchmarks too high for flats, co-living and PBSA?**

**Q4b – If no to Q4 please suggest an alternative and provide evidence to support your view.**

**Table B4 – Benchmark land values**

<b>Comment and / or query</b>	<b>Council/Three Dragons response</b>
General – recent brownfield land values similar to proposed BLVs.	Noted.
General – greenfield land values can be higher than the BLVs proposed, based on market values rather than EUV plus. However, few transactions so little evidence.	Acknowledge that there will be differences between market values and the EUV + approach used in the study.
BtR specific – no comments received	Noted

PBSA – achieved market values for PBSA sites have been higher than the BLVs suggested, by some margin. Commentary suggested that these higher values achieved have been illustrative of the strong viability of this type of development, with the ability to outbid other uses.	Acknowledge that there will be differences between market values and the EUV + approach used in the study. Strong land bids by PBSA illustrate the value of these schemes.
All – DLUHC values in appropriate as there are so many caveats applied to the values – difficult to form an opinion without further information.	Approach used to setting BLV is within the main report.
All – EUV plus is nonsensical, better to work on a residual valuation basis.	Approach follows the PPG guidance.

**Q5 – Do you agree with the development costs outlined for flatted and BtR development types?**

**Q5a – If no to Q5 please suggest an alternative and provide evidence to support your view.**

**Table B5 – Costs for flatted and BtR development types**

<b>Comment and / or query</b>	<b>Council/Three Dragons response</b>
BtR - build costs rising, don't use the breakdowns used within the assumptions report but a figure of around £200 per sqf for all development costs (including meeting latest building regs Part L, Part S and fire safety) considered appropriate	The proposed figure in the comment is similar to that being used, once the additions have been made to the base BCIS figure.
BtR - professional fees considered too low at 6%, would expect a figure closer to 10%	Professional fees have been increased.
BtR – return considered reasonable	Noted.
BtR – anticipated total build period for 150 units would be around 2 to 3 years, with rents starting after 18 months and fully let within 12 months but depends on the number of blocks constructed.	A slightly more conservative approach is used in the testing to match the standard market flats.
All – Base build costs are incorrect and should be reviewed using Q1 2022.	Build costs are explained further in the main report, with a copy of the figures used within the appendix.
All – plots cost understated at 10% should be 15%.	Plot costs are considered appropriate.
All - professional fees are shown at 6% and 8%, these should be 10% and 12%.	The 6% has been increased to 8% to reflect comments.
All – cost allowances for Part L, Part S and fire safety are too low.	Costs are taken from government impact assessment and considered conservative rather than low.

All - legal fees only mention affordable and first homes – clarification required.	Legal fees of varying rates are included – please see main report for detail.
All – given risks associated with rising material and financial costs developer return should be 20% GDV on the market flats. Agreed that 6% GDV affordable units is appropriate.	Whilst it is accepted that materials have increased, values have increased at a faster rate and therefore there is not an increased risk on this basis.
All – 3% GDV for sales and marketing reasonable on large sites, but maybe insufficient on small sites	Noted – a standard figure is used for costs and values.
All – no allowance for biodiversity net gain	There is an allowance for biodiversity net gain please see main report for details.

**Q6 – Do you agree with the development costs outlined for PBSA and co-living development types?**

**Q6a – If no to Q6 please suggest an alternative and provide evidence to support your view.**

**Table B6 – Costs for PBSA and co-living development types**

<b>Comment and / or query</b>	<b>Council/Three Dragons response</b>
PBSA – university schemes now proposed to have higher fire safety and building standard (Passivhaus) than required by policy. Otherwise, no comment	Noted
All – Base build costs are incorrect and should be reviewed using Q1 2022.	Build costs are explained further in the main report, with a copy of the figures used within the appendix.
All – plots cost understated at 10% should be 15%.	Plot costs are considered appropriate.
Professional fees are shown at 6% and 8%, these should be 10% and 12%.	The 6% has been increased to 8% to reflect comments.
PBSA– Base build costs are incorrect	Build costs are explained further in the main report, with a copy of the figures used within the appendix.
Co-living – agree that it is difficult to provide costs for co-living, given the lack of data.	Noted.
Co-living – no mention of operating costs – would expect to see c.25%	This is set out in the main report.

**Table B7 – Other comments**

<b>Comment and / or query</b>	<b>Council/Three Dragons response</b>
-------------------------------	---------------------------------------

<p>Would like to see flexibility built into the charging schedule to allow negotiations on the CIL rate owing to the unique models that BtR, PBSA and co-living present</p>	<p>This is a misunderstanding of how CIL operates – it is a non-negotiable rate with limited opportunity to change once set. However it agreed that BtR and co-living are new models of delivery and thus any rate setting should be cautious to take this into account.</p>
<p>Setting a CIL rate in advance of the local plan review is mis guided</p>	<p>Please see this paper as to why there is a partial review of CIL.</p>
<p>Supports a lower CIL rate for flats on the basis that this type of development is less viable and harder to bring forward for development.</p>	<p>Please see main report for viability assessments of flatted typologies</p>
<p>CIL should incorporate all the 's106' requirements to simplify the process</p>	<p>Noted.</p>

## Appendix C – Revised Infrastructure Delivery Plan

### Notes:

- This revised Exeter Infrastructure Delivery Plan (IDP) is based on the Exeter Infrastructure Delivery Plan of August 2011 which supported the Exeter Core Strategy adopted 2012
- The major infrastructure providers have assisted the Council in identifying which items of infrastructure that were identified in 2011 are outstanding
- As to be expected infrastructure needs have changed over the period since 2011 and where infrastructure has been brought forward or is no longer required these have been omitted from this revised version, therefore there will gaps in the numbering
- Exeter City Council is currently preparing a local plan which will replace the Core Strategy – the ‘new’ Exeter Plan will require a range of supporting infrastructure, however this revised IDP has not sought to include infrastructure items that support the new local plan as it is based on the current Core Strategy – however there will be some infrastructure requirements that are likely to cross over as some polices and remaining parts of allocations may be common to both the Core Strategy and the new Exeter Plan
- Some infrastructure items are population/household driven and therefore as development will continue to come forward under the current Core Strategy these requirements will continue - we have not sought to add these to the infrastructure costs, so any funding gap is likely to be higher than set out in this report
- The update does not seek to alter any criticality ratings – prioritisation will be for the new local plan evidence base to consider
- The order and the item numbering has not been altered to enable ease of reference back to the original IDP
- Costs are shown as originally set out, unless specified as an update - in all cases the final total and funding gap is an adjusted figure that has taken into account inflation using the BCIS AITPI indexing

The table below lists the infrastructure items. The ratings are:

- **Critical:** Identifies those items that are vital to bring forward development and to which there is no easily identifiable alternative
- **Essential:** Items are very important but alternative infrastructure and policy approaches could be put in place
- **Desirable:** Items are those that add to the quality of a place - either in terms of functionality or attractiveness as a place to live

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.	Transport						
1.2	Monkerton/ Hill Barton	<p>Enhanced Public Transport Route between Cranbrook, City Centre and new development to the southwest together with wider public transport accessibility.</p> <p>Providing critical, high quality public transport links between the city centre and major strategic development proposals to the east and south west of the city (Monkerton, Cranbrook, and Alphington). Services will be sufficient to provide for a step change in the level of public transport use within the area, enabling development to be accommodated without unacceptable impacts on air quality, the environment, and reliability of journey time.</p> <p>Key strategic infrastructure requirement in CS, reflected in policy CP9 (Strategic Transport Measures) and CP19 (strategic site infrastructure requirements).</p>	DCC, ECC, EDDC, Bus operators, Rail industry, Developers	£2.5m Remaining: £0.5m	Developer contribution (Monkerton area development)	2011 – 2021 Station for Monkerton still outstanding. See 1.6 below. Other items mainly delivered.	Critical <u>Medium risk:</u> contributions not yet secured.

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.5	Monkerton/ Hill Barton	<p>M5 Junction 29 improvements</p> <p>To accommodate strategic development proposals to the east of the city without significantly impairing the function of the strategic highway network (M5 and A30) or constraining public transport accessibility.</p> <p><i>Policy CP9 (Strategic Transport Measures)</i></p>	DCC, Highways Agency	<p>£14.45m</p> <p>Funded: £14.44m</p> <p>Remaining: £0.006m</p>	<p>DfT central Government</p> <p>£10.4m / Developer Contributions</p> <p>£4m from Skypark/Science Park (DCC contribution of £2m until s106 income received)</p>	<p>2011 – 2016</p> <p>Mainly completed</p> <p>Now mainly complete except Moor Lane r'bout walking/cycling route.</p>	<p>Critical</p> <p><u>Nil risk:</u> major Scheme bid approved by DfT and now mainly complete.</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.6	Monkerton/ Hill Barton	<p>New railway station at Met Office on Exmouth to Exeter line.</p> <p>Part of an area wide enhancement of the local rail network delivering a sustainable modal shift from existing and new residential and employment development proposals, thus reducing the impacts of such development on the constrained highway network and optimising the capacity of the existing transport networks in the Exeter area .</p> <p><i>Policy CP9 (Strategic Transport Measures) and CP19 (Newcourt strategic site infrastructure requirements).</i></p>	DCC, ECC, Network Rail, First Great Western, Developers.	<p>£15m +</p> <p>Remaining:</p> <p>At least c. £11m (based on Marsh Barton costs); may be more as additional passing loop/signalling on line required</p>	LTP, DfT central Government, Developer Contributions	<p>2026 – 2031</p> <p>Not delivered - cost is 2022 based.</p>	<p>Essential</p> <p>High risk: feasibility assessment underway as part of 'Devon Metro' work. Selective dualling and resignalling would be required.</p> <p>No agreement from Network Rail or First Great Western to establishment of new rail station at Met Office although new station is now referred to in Network Rail's 'Rail Utilisation Strategy'.</p> <p>Land will need to be identified in the Monkerton and Hill Barton area.</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.10	Newcourt	<p>Second new all-movement junction onto the A379 (replacing existing left in, left out Sandy Park access).</p> <p>Significantly complete. Some Newcourt parcels to be developed (St Bridgets and N of St Bridgets) and need for a link from the hotel to Old Rydon Road/A379; plus pedestrian underpass/bridge to Newcourt station.</p> <p><i>To mitigate development impacts of Newcourt and serve development east of the railway line.</i></p>	DCC, ECC, Developers, Highways Agency	<p>£0.75m</p> <p>Remaining: £0.75m</p>	Developer funded (primarily Newcourt area developments)	<p>2016 – 2026</p> <p>Partially complete</p>	<p>Critical</p> <p><u>Low/Med risk:</u> some s106 obligations agreed.</p>
1.13	Newcourt	<p>Package of high quality walking and cycling routes within development</p> <p>Linking to surrounding employment areas and City Centre (see also 1.31).</p> <p>Promotes sustainable transport modes, catering for a modal shift and reducing dependency on private car travel.</p> <p>Extends the network of walking and cycling routes within Exeter, enhancing pedestrian links to key centres and employment destinations</p> <p><i>Policy CP9 (Strategic Transport Measures) and CS Para. 12.11</i></p>	DCC, ECC, EDDC, Sustrans	See 1.29	Developer funded (primarily Newcourt area developments)	<p>2016 – 2026</p> <p>See 1.29</p>	<p>Essential</p> <p><u>Low risk:</u> accepted as integral to new development and strong commitment through Green Infrastructure Strategy. Internal links will need to be linked to external cycle connections. New bridge delivered as part of A379 junction (see 1.10)</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.14	Newcourt	<p>Package of public transport services and improvements</p> <p>Providing quality public transport links between Newcourt and central parts of the city.</p> <p>Complemented by rail improvements, services will be sufficient to provide for a step change in the level of public transport use within the area, allowing development to be accommodated without negative impacts on accessibility, air quality, the environment, and reliability of journey time.</p> <p>Partly delivered, some remaining measures e.g. bus gate outstanding</p> <p><i>Policy CP9 (Strategic Transport Measures) and CP19 (Newcourt strategic site infrastructure requirements).</i></p>	DCC, ECC, Bus operators	<p>£2.5m</p> <p>Funded: £2m</p> <p>Remaining: £0.5m</p>	LTP3 (design and feasibility work), Developer Contributions , (Newcourt developments - £2m already secured)	2016 – 2026 Partly delivered	<p>Essential</p> <p><u>Medium Risk:</u></p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.16	Alphington	<p>Package of high quality walking and cycling routes within development</p> <p>Linking to surrounding employment areas and City Centre (see also 1.31).</p> <p>Promotes sustainable transport modes, catering for a modal shift and reducing dependency on private car travel.</p> <p>Strengthens the strategic footpath and cycle links between the City Centre and the south west of the city, encouraging the use of sustainable transport modes.</p> <p><i>Policy CP9 (Strategic Transport Measures) and CS Para. 12.22</i></p>	DCC, ECC	See 1.29	Developer Funded	2011 – 2021 See 1.29	<p>Essential</p> <p>Low risk - Accepted as integral to new development and strong commitment through Green Infrastructure Strategy.</p> <p>Internal links will need to be linked to external cycle connections.</p>
1.17	Alphington	<p>Highway improvements to Alphington Road Corridor.</p> <p>To increase capacity to accommodate additional development traffic and maintain accessibility for the west of the urban area into the city centre – managing congestion and improving air quality.</p> <p><i>Policy CP9 (Strategic Transport Measures) and CP19 (Alphington strategic site infrastructure requirements).</i></p>	DCC, ECC	£1.3m Remaining: £0.6m	£700K - LTP3 £600K - Developer Contributions (Haven Banks/Quays and Water Lane development)	2011 – 2016	<p>Critical</p> <p><u>Low risk</u> – Most of Alphington Road (Sainsbury's end) works are near completion, funded by LTP. There are remaining improvements at Haven Road junction (approx. £600K).</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.18	Alphington	<p>Additional buses to extend local bus routes to serve new development (500 dwellings)</p> <p>To help deliver the necessary modal split for the urban extension to the south west and minimise traffic impacts on the congested Alphington Road corridor.</p> <p><i>Policy CP9 (Strategic Transport Measures) and CP19 (Alphington strategic site infrastructure requirements).</i></p>	DCC, ECC Bus operators	£0.88m Remaining: £0.88m	Developer funded (Alphington development)	2011-2016	<p>Critical</p> <p><u>Low Risk</u> - Accepted as integral to new development and there are existing bus routes in the area which can be extended</p>
1.21	West of Exeter	<p>Park and Ride site to the west of Exeter A30 for 780-spaces.</p> <p>Maintaining accessibility from the west of the urban area into the city centre – reducing congestion, prioritising public transport and improving air quality.</p> <p><i>Policy CP9 (Strategic Transport Measures)</i></p>	DCC, ECC, National Express, Stagecoach	£8m Remaining: £8m	LTP3, Developer Contributions (potential CIL)	2006-2016	<p>Critical</p> <p><u>Medium risk</u> – Public consultation was held in November 2008 and following the completion of technical design work the scheme was submitted to members. However, planning permission was not granted and DCC are currently working on a revised scheme.</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.22	Pinhoe Area	<p>New Highway link between Harrington Lane and Exhibition Way</p> <p>To accommodate growth planned in the Pinhoe area and ensure impacts on the existing network are acceptable – allowing for essential traffic management on Chancel Lane and at the double mini roundabouts</p> <p><i>Policy CP9 (Strategic Transport Measures).</i></p> <p>Note: Project amended because of village green impact on highway element. Highway element no longer being progressed but walking/cycling bridge proposed &amp; package of measures for Pinhoe/Beacon Heath. Project merge with 1.23 below.</p>	DCC, ECC, Network Rail, Developers	see 1.23 below)	Developer funded (Pinhoe developments)	2011-2016.	<p>Critical</p> <p><u>Medium Risk</u> – Needs ECC land at southern end and for developers at Pinhoe Quarry and Ibstock brickworks to deliver link road</p>
1.23	Pinhoe Area	<p>New pedestrian cycle bridge</p> <p>Widening of carriageway on railway bridge for new link road between Harrington Lane and Exhibition Way (see 1.21 above) means alternative safe access over the railway is needed for pedestrians and cyclists.</p> <p><i>Policy CP9 (Strategic Transport Measures).</i></p> <p>Note: Project amended because of village green impact on highway element but walking/cycling bridge proposed &amp; package of measures for Pinhoe/Beacon Heath. Project merge with 1.22 above.</p>	DCC, ECC, Network Rail, Developers	<p>£0.75m</p> <p>Funded: £0.425m</p> <p>Remaining: £0.325m</p>	Developer contributions (Pinhoe developments) LTP3	2011-2016	<p>Essential</p> <p><u>Medium Risk</u> – would need liaison with Network Rail to obtain easement for additional crossing, which would need to take into account any future electrification plans</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.24	Pinhoe Area	<p>Additional bus to extend local bus routes to serve new development</p> <p>To help deliver the necessary modal split for sustainable travel modes to minimise traffic impacts on Pinhoe Road and Beacon Lane.</p> <p><i>Policy CP9 (Strategic Transport Measures).</i></p>	DCC, ECC, Stagecoach	Unknown	Developer funded (Pinhoe developments)	2011-2016  Much of Pinhoe development already delivered	Essential  <u>Low Risk</u> - Accepted as integral to new development and there are existing bus routes in the area which can be extended
1.25	North of Exeter	<p>New modal interchange facilities to improve traffic movements within Exeter and from the north (i.e. Crediton and Tiverton)</p> <p>To maintain accessibility from the north of the urban area into the city centre – reducing congestion, prioritising public transport and improving air quality.</p> <p><i>Policy CP9 (Strategic Transport Measures)</i></p>	DCC, ECC/MDDC, Stagecoach	Around £1m Remaining: £1m	LTP3, Developer Contribution/ Developer Funded (potential CIL)	2016 – 2026	Essential  <u>High Risk</u> – No site identified yet. Further assessment of costs required.
1.27	City Centre	<p>Public Realm and Traffic Management Enhancements</p> <p>To support aims for a vital and viable city centre, offering a positive experience to the visitor and supporting a low carbon strategy by reducing through traffic and improving conditions for pedestrians, cyclists and buses.</p> <p><i>Policy CP9 (Strategic Transport Measures)</i></p>	DCC, ECC, Stagecoach	£5m Funded: £3.07m Remaining: £1.93m	DCC (LTP3), ECC, Developer Contributions	2011 – 2021 Ongoing	Critical  <u>Low/Medium risk</u> – analysis is being progressed to inform a traffic management strategy to deal with reassigned traffic.

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.28	City Wide	<p>Improvements to railway stations, including</p> <p>Enhancing strategic transport interchanges to deliver a step change in the level of public transport use in the city – enhancing the convenience and journey time reliability of using public transport for a range of journey purposes.</p> <p>Note: Exeter St Davids, St Thomas step free access and Polsloe Bridge step free access still outstanding.</p>	Network Rail, First Great Western, South West Trains, ECC, DCC	c£1.5m Remaining: £1.5m	National Station Improvement Programme (DfT through Network Rail), First Great Western	2006 – 2026 Partial delivery	<p><u>St Davids and Central: Essential</u></p> <p><u>Medium risk</u> – negotiations are ongoing, however, agreement regarding works, phasing and costs has not been reached.</p> <p><u>St James' Park: Desirable</u></p> <p><u>High risk</u> - Further Assessment required as part of 'Devon Metro' work. No agreement from Network Rail or South West Trains</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.29	City Wide	<p>Exeter Area Pedestrian and Cycling Infrastructure Package.</p> <p>Promotes sustainable transport modes, catering for a modal shift and reducing dependency on private car travel. Enabling optimal use of the existing road network.</p> <p>Improvements relate to schemes identified in the Exeter Cycling and Walking Strategies, including a new strategic footpath and cycle link between the City Centre and development in the east (£2m)</p> <p><i>Policy CP9 (Strategic Transport Measures)</i></p> <p>Note: Individual site pedestrian and cycling infrastructure is combined into an Exeter-wide strategy. The remaining funding is a proportion of the total package based on sites from the Core Strategy that have yet to come forward.</p>	DCC ECC EDDC TDC Sustrans	<p>£50m (£21m)</p> <p>Funded: £2.7m</p> <p>Remaining: £18.3m</p>	Developer Contributions Government funding	2006 – 2026  Costs as at 2022	<p>Essential</p> <p><u>Medium risk</u> – Exact improvements, routes and costs need to be established, but the Green Infrastructure Strategy and Monkerton and Hill Barton Masterplan supports the provision of sustainable movement networks.</p> <p>Firm relationship with pedestrian and cycling infrastructure provision.</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
1.3	City Wide	<p>Bus Service upgrades and enhancements (e.g. Smartcard ticketing and bus priority measures).</p> <p>Promotes sustainable transport modes by making bus-based public transport more effective across the city. Helps to secure lower car based trip rates from existing and new development.</p> <p><i>Policy CP9 (Strategic Transport Measures) Policy CP11 (Pollution)</i></p> <p>Note: Some upgrades outstanding – e.g. travel platform</p>	DCC, Stagecoach	<p>£0.35m</p> <p>Funded: £0.325m</p> <p>Remaining: £0.025m</p>	LTP3, DfT, (central Government grants/ funding) Developer funding (potential CIL)	2011-2026 Partial delivery	<p>Essential</p> <p><u>Low/Medium</u> – minor infrastructure improvements can be delivered through LTP/ developer funding.</p>
1.31	City Wide	<p>Upgrade of bus fleet</p> <p>Tackles air quality issues associated with buses which have a disproportionate impact on NO2 / PM10 levels in the city.</p> <p><i>Policy CP9 (Strategic Transport Measures) Policy CP11 (Pollution)</i></p> <p>Note: Some upgrades outstanding – e.g. electric bus fleet for local journeys.</p>	DCC, Stagecoach	<p>£10m</p> <p>Funded: £9m</p> <p>Remaining: £1m</p>	LTP3, DfT, (central Government grants/ funding) Developer funding (potential CIL)	2016-2026	<p>Essential</p> <p><u>Medium</u></p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
<b>2.</b>	<b>Education, Children and Young People</b>						
2.5	Newcourt	<p>Primary Schools: 2 x 420-place (1.9ha sites) including 52 place nursery provision at each school.</p> <p>To provide primary education that is close / walking distance to the pupils living in the Newcourt urban extension.</p> <p><i>Policy CP19 (Newcourt strategic site infrastructure requirements)</i></p>	DCC, ECC Developers	£12m approx.. (2008 prices) plus land. Remaining : £9m for 1 school. Plus land	Developer Contributions (S106/CIL)	<p>Primary School 1: 2011-2016</p> <p>Primary School 2: 2016-2021</p> <p>7</p> <p>1 delivered and 1 outstanding. Cost 2022 based</p>	<p>Critical</p> <p><u>Low risk</u> – funding should follow pupil numbers but will need transitional funding (funding contribution formula well established). Indicative sites identified by masterplanning,</p>
2.6	Alphington (Based on 500 homes in Exeter)	<p>Primary school provision to serve urban extension</p> <p>500 homes in Exeter may generate approx. 125 primary age pupils.</p> <p>It is expected that provision will be made within Teignbridge District to the south west of Exeter and that developer contributions will be invested there. However, a site for 210 primary school (1.2 ha) may be required if infrastructure cannot be delivered in Teignbridge – to meet educational needs of primary-age pupils arising from the Alphington extension</p> <p><i>Policy CP19 (Alphington strategic site infrastructure requirements)</i></p>	DCC, ECC, TDC	c£2.5m Remaining : £2.5m	Developer Contributions (S106/CIL)	2016 – 2021 Being delivered with forward funding, repayable costs per dwelling. Figure is 2017 based	<p>Critical</p> <p><u>Medium</u> – funding should follow pupil numbers but will need transitional funding (funding contribution formula well established).</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
2.7	Alphington (Based on 500 homes in Exeter)	<p>Secondary school provision to serve urban extension</p> <p>500 homes in Exeter may generate approx 75 secondary age pupils. It is anticipated that enhancements to existing local school facilities will be able to accommodate this need.</p> <p>If development comes forward adjacent to Alphington in Teignbridge district, a new secondary school may, subsequently, be required.</p> <p><i>Policy CP19 (Alphington strategic site infrastructure requirements)</i></p>	DCC, ECC, TDC	c£1.27m Remaining : £1.27m	Developer Contributions (S106/CIL)	2016-2021 Being delivered with forward funding, repayable costs per dwelling. Figure is 2017 based	<p>Critical</p> <p><u>Low/Medium</u> – funding should follow pupil numbers but will need transitional funding (funding contribution formula well established).</p>
2.9	Rest of Exeter – Water Lane Area	<p>Primary School provision to serve water lane regeneration area</p> <p>800 homes may generate approx. 200 primary pupils.</p> <p>Provision may come in the form of a new school or enhancements to existing schools.</p> <p><i>Policy CP10 (Meeting Community Needs)</i></p>	DCC, ECC, Developers	£2.9m approx. <sup>12</sup> Remaining : £5.8m	Developer Contributions (S106/CIL)	2016-2026 Still outstanding. Revised figure is 2022 based	<p>Critical</p> <p><u>Low / Medium risk</u> – funding should follow pupil numbers but will need transitional funding (funding formula well established).</p>

Item	Area/strategic site	Infrastructure need and outcome/impact	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
<sup>12</sup> Includes contribution towards special school places; but not proportional contribution towards land.							
2.10	Rest of Exeter – Water Lane Area	<p>Secondary School provision to serve water land regeneration area</p> <p>800 homes may generate approx. 120 secondary pupils.</p> <p>Provision likely to come through enhancements to an existing school.</p> <p><i>Policy CP10 (Meeting Community Needs)</i></p>	DCC, ECC, Developers	c£2.6m Remaining : £2.6m	Developer Contributions (S106/CIL)	2016-2026 Still required, costs based on DCC guidance. Figure is 2015 based.	<p>Critical</p> <p><u>Low/Medium risk</u> – funding should follow pupil numbers but will need transitional funding (funding contribution formula well established).</p>
2.12	Rest of Exeter – Grecian Quarter	<p>Secondary school provision to serve Grecian Quarter regeneration area</p> <p>250 dwellings could generate approx. 37 secondary age pupils.</p> <p>Provision to be made in existing school.</p> <p><i>Policy CP10 (Meeting Community Needs)</i></p>	DCC, ECC, Developers	c£0.8m Remaining : £0.8m	Developer Contributions (S106/CIL)	2016-2026 Still required, costs based on DCC guidance. Figure is 2015 based.	<p>Critical</p> <p><u>Low risk</u> – funding should follow pupil numbers (funding contribution formula well established).</p>

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery/risk/mitigation
3.	<b>Flooding</b>						
No outstanding (Core Strategy) flooding mitigation measures to be delivered – Exeter Flood defence scheme delivered.							
4.	<b>Public Services (Libraries, Cemeteries and Emergency Services)</b>						

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
4.1	Monkerton / Hill Barton /Pinhoe	Provision of a new community building to serve Pinhoe, Monkerton/Bill Barton. Including library provision, health outreach, café, meeting space, work hub space and changing rooms.	Community, ECC, Developers	£2m	Developer Contributions (S106/CIL), community fund raising, other grants	2022 - 2026	Essential <u>Medium risk.</u> Business case produced.
4.3	Alphington	Expansion of library provision serving West Exe area and Alphington Combined facility at SWE as part of new community building	DCC, ECC, Developers	c£0m Remaining : £0m	Developer Contributions (S106/CIL)	2016-2021	Essential <u>Medium risk</u>
4.7	City Wide	Archive storage for archaeological remains with capacity for with public access	Developers ECC, DCC, and Devon-wide local authorities	c£0.05m Remaining : £0.05m	Developer Contributions (s106/CIL)	2011-2026	Essential <u>Medium risk</u> – identification and procurement of additional storage capacity required.

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
5.	<b>Energy, Utilities and Waste</b>						

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
5.1	Monkerton / Hill Barton, Newcourt and Alphington	Decentralised and renewable or low-carbon infrastructure to create low or zero carbon urban extensions. Greatest potential is for Combined Heat and Power (CHP).	ECC, DCC, Ofgem, RDA, Energy Service Companies	Not Known 17	Private Companies, Allowable solutions, Low Carbon Infrastructure Fund	2011 – 2026	Critical <u>Medium risk</u> – Costs of infrastructure provision are very high. Uncertainty regarding ‘allowable solutions’ to meet zero carbon standards.
5.2	East of Exeter	New Sewerage and Treatment Capacity To serve developments to the east of Exeter	SWW	Not Known	Water Charges	2011-2016	Critical <u>Medium risk</u> – Planning permission already granted and water charge increase included in SWW Business Plan. But, land ownership not yet secured.
5.3	Countess Weir Improvements	Investment to Improve capacity of existing sewage treatment works.	SWW	Not known	Water Charges	2011-2021	Critical <u>Low risk</u> – Water charge increase included in SWW Business Plan

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
5.4	Eastern side of Exeter (Newcourt, Monkerton/Hill Barton)	Water supply distribution (New Trunk Mains) and sewage infrastructure.	SWW, Developers	Not known	SWW capital funding stream	2011-2021	Critical <u>Low risk</u> – Developers are aware of requirements and funding system well established.
5.5	City Centre and South West of City	New Cable circuits across City from Haven Road ('Primary' sub-station) to Sowton Industrial Estate (Primary sub-station) OR a new overhead tower line to the south of the city to Water Lane.	National Grid	Not known	Costs recovered from developers in accordance with 'Statement of Connection Charging Methodology'	2011-2016	Critical <u>Low risk</u> – Distribution license requires connections to be provided for all new customers and develop/reinforcement of infrastructure accordingly.
5,6	Eastern side of Exeter	Installation of additional equipment at existing National Grid 'Primary' substations at Countess Wear and Sowton Industrial Estate or the establishment of a new substation site	National Grid	Not known	Costs recovered from developers in accordance with 'Statement of Connection Charging Methodology'	2016-2021	Critical <u>Low risk</u> – Distribution license requires connections to be provided for all new customers and develop / reinforcement of infrastructure accordingly.

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
6.	<b>Health</b>						
6.1	Eastern side of Exeter: Newcourt	Primary Care provision to serve new population	Devon CCG, DCC, Developers	£1.3m Potentially plus land Remaining : £1.3m	Development	2011 – 2026	Critical <u>Medium risk</u> – Establish funding mechanism
6.2	Monkerton / Hill Barton	Primary Care provision to serve new population	Devon CCG, DCC, Developers	£1m Potentially plus land Remaining : £1m	Development . NHS	2011 - 26	Critical <u>Medium Risk</u> – Establish funding mechanism
6.3	Alphington	Primary Care Premises to serve new population	DPCT, DCC, Developers	£0.192m Remaining : £0.192m	Development . NHS	2011 – 2026 Being delivered with forward funding, repayable costs per dwelling. Figure is 2017 based	Critical <u>Medium risk</u> – Establish funding mechanism.
6.4	Central Exeter	Extensions to existing practices or possible one new practice	Devon CCG, DCC, Developers	£2m	Development . NHS	2011 - 2026	Critical <u>Medium risk</u> – Extensions to existing practices could occur without new site being identified However requirement needs to be confirmed

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
6.5	Rest of Exeter	Potential refurbishment or additional provision city wide	RD&E, Devon CCG, DCC.	Unknown	NHS, Developer Contributions	2011 – 2016 Unclear as to whether there is still need.	Essential <u>High risk</u> – requirements still to be determined in detail.
6.6	Rest of Exeter	Two new 50 bed extra-care housing schemes. Both facilities need to be proximal to other services and shops.	ECC's, HCA, DCC, Developers	Unknown	HCA, DCC, Department of Health, RP borrowing, Mixed tenure, Developer Contributions	2010 – 2027	Essential <u>Medium risk</u> – identification of appropriate sites is necessary. Facilities are necessary to serve both existing needs those generated by new housing development.

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
7.	<b>Sport, Recreation and Culture</b>						
7.1	Undetermined 21	Sports Hall (4 badminton size sports hall)	ECC, Developers.	£2.7m Remaining : £2.7m	Developers Contributions S106, CIL	2011 – 2026	Desirable <u>Medium risk</u> – Site to be identified.

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
21 Whilst much of the demand arises from development to the Eastern side of Exeter, the most sustainable location may be within the existing urban area							
8.	<b>Green Infrastructure (GI)</b>						
8.1	Eastern side of Exeter; Monkerton/ Hill Barton	GI route running through site and linking into existing GI  To contribute to the sustainable movement network and to enhance the biodiversity network	ECC, Developers	Direct provision	Developers (S106, CIL)	2011 – 2026	Critical  <u>Medium risk</u> – Land availability challenges.
8.3	Eastern side of Exeter: Newcourt	Provision of pedestrian and cycle bridge over railway.  To contribute to the sustainable movement network and to enhance the biodiversity network  See also 1.13 and Newcourt Masterplan	ECC, DCC Developers	See 2.9 above	Developers (S106, CIL)	2011 -2026 See 2.9 above	Critical  <u>Medium risk</u>
8.5	North of City	Develop walking, cycling and horse riding links to north of City  Extending Exe Valley Trail	ECC, DCC, EDDC, Natural England	See 2.9	DCC, Developer Contributions	2006 – 2026 See 2.9	Desirable  <u>Medium</u> – Phase Two Green Infrastructure work will establish costs and phasing.
8.6	Rest of City	Allotments	ECC	Approx £315K For allots. 23  Remaining : £0.315m	ECC, Developer Contributions	2006 – 2026	Essential  <u>Medium</u> – Land availability challenges.

Item	Area/strategic site	Infrastructure need	Key partners in provision	Cost	Funding sources	Timetable	Criticality/delivery /risk/mitigation
9.	<b>Avoiding Harm to Natura 2000 Sites and Ramsar Sites</b>						
9.1	City wide (and into Teignbridge and East Devon District Councils)	Measures to avoid harm to the Exe Estuary Special Protection Area (SPA) and Ramsar site, The East Devon Pebblebed Heaths SPA and Special Area of Conservation (SAC) and the Dawlish Warren SAC	Natural England TDC EDDC DCC	c£2.9m Remaining : £2.9m  £1035.23 per dwelling / £1359.51 per dwelling	Developers (CIL)	2011 - 2026  Based on 2022 costs	Critical  <u>Low Risk:</u> Delivered jointly through the South East Devon Habitats Mitigation Strategy and Joint Committee covering Exeter, East Devon and Teignbridge. Implementation team established and operating to deliver.
Total infrastructure cost including adjustment for inflation			£180m				
Total funding gap including adjustment for inflation			£93m				



Exeter City Council – CIL Partial Review

# Viability evidence

Document 2 – March 2022

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Three Dragons



<b>Document control sheet</b>	
<b>Project name</b>	Exeter City CIL Partial Review 2022
<b>Project reference</b>	CIL Review
<b>Report title</b>	Viability evidence
<b>Doc ref</b>	Document 2
<b>Date</b>	March 2022
<b>Prepared by</b>	Mark Felgate, Dominic Houston & Paul Dunnell
<b>Reviewed by</b>	Lin Cousins & Tom Marshall
<b>Quality statement</b>	In preparing this report, the authors have followed national and professional standards, acted with objectivity, impartially, without interference and with reference to appropriate available sources of information. No performance-related or contingent fees have been agreed and there is no known conflict of interest in advising the client group.
<b>Use of this report</b>	<p>This report is not a formal land valuation or scheme appraisal. It has been prepared using the Three Dragons toolkits and is based on city level data supplied by Exeter City Council, consultant team inputs and quoted published data sources. The toolkit provides a review of the development economics of illustrative schemes and the results depend on the data inputs provided. This analysis should not be used for individual scheme appraisal.</p> <p>No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.</p>

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## EXECUTIVE SUMMARY

1. Exeter City Council (ECC) was one of the first local authorities in England to introduce CIL in 2013. The council recognises that since the CIL was brought in there have been changes and new products in the local property market that were not envisaged when the rates were originally set. Whilst standard houses and retail development are not subject to review and will retain their current rates, a partial review is proposed which considers the following forms of development:
  - Flatted development
  - Build to rent (BtR)
  - Purpose built student accommodation (PBSA)
  - Co-living
2. The testing of these types of uses found that for flats some of the results are negative or marginal, all the BtR typologies were viable but would not be able to afford the current residential rate, PBSA typologies were all viable with significant headroom and co-living had similar results to BtR.
3. Whilst flatted development is marginal or unviable it would pose a risk to delivery with a positive CIL rate, however it will still be expected to contribute towards s106, including both habitat mitigation and affordable housing.
4. BtR is currently subject to the full rate, which will be challenging to achieve on higher developments. Co-living currently does not attract any CIL and therefore as it is viable to do so it is reasonable to expect a contribution to infrastructure provision through CIL.
5. In terms of PBSA it is already subject to a CIL charge, although this was set at a time where this form of development was relatively untested. The market for PBSA in Exeter has matured and it is reasonable that this has been reviewed and a higher charge recommended.
6. The proposed rates and current rates to be retained are as follows:

Zone and/or use	Proposed/retained CIL rate
<b>Revised or new rates</b>	
<b>Flatted development</b>	£0 / sqm (replaces current rate £118.57)
<b>Build to rent</b>	£50 / sqm (replaces current rate £118.57)
<b>Purpose built student accommodation</b>	£150 / sqm (replaces current rate £59.29)
<b>Co-living</b>	£50 / sqm (replaces current rate £0)
<b>Current rates 2022 retained</b>	
<b>Residential development excluding flats</b>	£118.57
<b>Out of centre retail</b>	£185.27
<b>Other forms of development not listed above</b>	£0

# Chapter 1 Introduction

## Context

- 1.1** Three Dragons were commissioned by Exeter City Council to undertake a viability assessment at a strategic level of specific development types and uses, consideration of current Local Plan requirements and other costs, to inform the Partial Community Infrastructure Levy (CIL) Review and setting of CIL rates. The viability evidence provided in this report is intended to assist Exeter City Council in preparing its CIL Draft Charging Schedule (DCS).
- 1.2** This report provides assumptions and typologies, reflecting latest available information over Q4 2021.
- 1.3** Exeter City Council (ECC) was one of the first local authorities in England to introduce CIL in 2013. CIL is currently charged at different levels per sqm for different uses and areas as set out in the charging schedule. The current rates (as indexed 2021/22) and categories are as follows:
- Residential - £118.57 per sqm of liable development
  - Purpose built student accommodation - £59.29 per sqm of liable development
  - Out of city centre retail - £185.27 per sqm of liable development
- 1.4** The rates were subject to a CIL Examination process and the supporting viability evidence at that time was found to be robust and able to demonstrate that retail development (outside the city centre) was the most viable development form, attracting the highest rates, with residential development and purpose built student accommodation also sufficiently viable for a charge but at lower rates than the retail charge. All other development was zero rated for CIL. The Examiner supported ECC proposals and the Council agreed the commencement of CIL charging in October 2013.
- 1.5** The council recognises that since the CIL was brought in there have been changes and new products in the local property market that were not envisaged when the rates were originally set, where the focus was on edge of settlement house led schemes and to a lesser extent new retail development. In particular, and the subject of the partial review the following development uses have been identified for review:
- Flatted development
  - Build to rent (BtR)
  - Purpose built student accommodation (PBSA)
  - Co-living
- 1.6** This report provides supporting viability evidence for the setting of CIL rates for those development types listed above – this report should be read in conjunction with Document 1 –

Background information (setting out why ECC is undertaking a partial review and includes an updated Infrastructure Delivery Plan) and Document 3 - Exeter Draft Charging Schedule.

## Testing viability for establishing CIL

### 1.7 The viability testing for this report has:

- been designed to assess the amount of CIL that specified development types can reasonably support, including whether there are differences in viability between the different types of tested development that are sufficient to justify differential CIL rates
- drawn on the following for analysis:
  - a review of the types of sites recently permitted or planned
  - a review of the policies in the current Core Strategy and central government guidance that may have implications for development viability. It should be noted that the viability assessment has not drawn on any emerging policies from the outline draft Exeter Plan (Local Plan) as this is only a Regulation 18 draft of the plan
  - a review of recent developer contributions agreed by the Council.
  - desk research to form initial views on the values and costs of tested forms of development in Exeter
  - consultation with the development industry including developers and agents active in the area. A note of the consultation is shown at Appendix B within Document 1 Background information.
- with agreement of the Council on the assumptions, utilised the Three Dragons viability models to undertake the viability testing set out in this report.

## Chapter 2 Policy context

### National

- 2.1** A review of national policy and guidance regarding viability and CIL is set out in Appendix A. As set out in the 'Document 1 - Background paper' the national guidance allows ECC to pursue a partial review of CIL – with para 25 (S45 PPG) stating “*Charging authorities may revise their charging schedule in whole or in part*”.

### Local Policy

- 2.2** The NPPF is clear that viability testing should take into account the costs of any requirements likely to be applied to development. Therefore, a planning policy review has been undertaken. The Exeter Core Strategy is the main planning document for Exeter, sitting alongside the Local Plan First Review. It is used as it has the most up to date (in an adopted plan) position regarding the current overarching spatial strategy and development principles for the area. There are also a range of Supplementary Planning Documents and Planning Statements including a First Homes Planning Policy Statement.

- 2.3** The Core Strategy was adopted in 2012. Policies within the Core Strategy are strategic in nature. The most relevant policies are in respect to:

- CP4 – density – residential development should achieve the highest appropriate density
- CP5 – housing mix – major development should include a mix of housing informed by context and need and should include where possible specialist housing (e.g. wheelchair accessible) and meet lifetime homes standards where feasible.
- CP7 – affordable housing – on sites of 3 or more dwellings 35% affordable housing should be sought, with at least 70% social rented housing where viable
- CP13 – energy - new development with a floorspace of 1,000 sqm or more or 10 or more dwellings will be required to connect to any existing or proposed decentralised energy network unless it is not viable or feasible to do so
- CP14 – decarbonising - new development with a floorspace of 1,000 sqm or more or 10 or more dwellings will be required to use decentralised and renewable or low carbon energy sources to cut predicted CO2 emissions by the equivalent of at least 10% over and above building regulations unless not viable or feasible to do so - it is noted that this policy is not currently implemented in respect of decision making
- CP15 – decarbonising - residential development will be required to achieve Level 5 Code for Sustainable Homes by 2016 and net zero carbon for commercial buildings by 2019
- CP16 – environmental mitigation – contributions will be sought from new development where there are impacts on protected areas (Habitat Regulations)

***Approach to affordable housing***

- 2.4** In terms of affordable housing the Council has advised that its latest position is set out in First Homes Planning Policy Statement June 2021 and that this should be used to inform the testing assumptions for flatted development. The revised policy approach retains the requirement for 35% affordable housing but has altered the tenure to require 25% of the affordable housing as First Homes, 70% as social rent and the balance as intermediate affordable housing (which the purposes of testing is considered as shared ownership).
- 2.5** In terms of Build to Rent (BtR) and Co-living (which is generally considered as a specialist form of BtR) it is understood that the council follows national guidance in seeking 20% of units as discount market rent (at 80% of the market rent). There is no affordable housing sought from purpose built student accommodation.

***Approach to decarbonising and building standards***

- 2.6** Whilst the Core Strategy encourages connection to decentralised networks it is understood that in practice development comes forward in central locations with an ability to connect in the future but as there are currently no networks within the city centre no actual connections have taken place. Therefore as there are currently no networks in the central area of the city, where most of the typologies will be located, it is not considered necessary to attribute any additional cost.
- 2.7** The Core Strategy policy also requires very high building standards with reference to standards no longer in place such as the 2006 Building Regulation. However, an allowance will be made in addition to base build costs to account for the latest 2021 Building Regulations, which come into force in June 2022. Further allowances will also be included for the cost of providing electric vehicle charging in line with Part S building regulations and for the provision of fire safety measures in taller buildings.

***Approach to environmental mitigation***

- 2.8** An allowance is made for biodiversity net gain in line with the government impact assessment to meet new requirements set out in the Environment Act. Also as indicated in CP16 there is need to allow for mitigation for habitat impact from residential development (including Co-Living but not including PBSA). Whilst this does not necessarily apply across all of the city it is included in all the testing.
- 2.9** It should be noted that there is a twin track approach to habitats mitigation. Where CIL is in place these contributions are sought by the Council from the CIL payment. Where CIL is zero or not required then payment will be through a s106 or alternative, S111 mechanism. Therefore testing undertaken in this work adds an allowance into the costs.

## Chapter 3 Approach to testing and typologies

### Uses included in the testing

**3.1** The uses tested are listed below and follow advice from the council as set out in Document 1 – Background Information:

- Flatted (standard sale led) development
- Build to rent (BtR) flats
- Purpose built student accommodation (PBSA)
- Co-living

### Typology selection

**3.2** The study uses a typology approach for the testing undertaken. The typologies are drawn from a review of planning applications and discussion with council officers about the type and form of development within each of the development categories within Exeter. They are not intended to represent specific development proposals but to reflect typical forms of development that are likely to come forward over the remainder of the plan period flats. The typologies were also set out as part of the stakeholder consultation and have been amended following comments from the development industry. The typologies are set out below, organised in the four broad groups of development types.

#### *Flatted development*

**3.3** There are limited examples of flat only schemes in Exeter as it has not been a common form of development in the city in recent years. The smaller site sizes and densities are drawn from the few examples that have been brought forward, while the larger typologies have reflected early design work by the council on potential larger brownfield sites that may come forward in the future. All typologies are tested on brownfield sites as this is the most likely development type, although the smallest test at 15 dwellings is also tested on greenfield as there may be some small pockets of garden and paddock land where this could be a possible development form. The proportions of net developable area<sup>1</sup> reflect policy requirements as well as typical characteristics of this site type.

**3.4** Feedback from the stakeholder consultation suggested that the typologies were a reasonable reflection of future development types but that the gross and net areas would generally be the

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<sup>1</sup> Net developable area is defined as the land within a site that is available for development and will include space for parking, services and smaller areas of public and private outdoor space. The gross site area will also include land for uses such as open space and parks, schools, major distributor roads.

same apart from the greenfield site where there could be an expectation of a larger gross area.

- 3.5** For the purposes of testing and for the implementation of CIL it is assumed that flatted development refers to homes which have neighbouring uses above and/or below. For clarity maisonettes and duplexes are also considered as flatted development.

### ***Build to rent***

- 3.6** BtR is a specialist form of development that requires a critical mass to be attractive to investment. Whilst a relatively new addition to the housing market commentary suggests that outside of the large metropolitan areas a minimum of 150 units is required for a standalone scheme. Equally the largest are assumed to be no larger than 400 units on any one scheme due to a risk of flooding the market with a single development type. As there are limited differences in terms of gross floorspace the same site areas and density ties are used as for standard flatted development.
- 3.7** Feedback from the stakeholder consultation suggested that whilst the sizes were appropriate in terms of the numbers there could be scope in Exeter for a higher density, taller scheme, so this has been added to the testing.
- 3.8** For the purposes of testing and for the implementation of CIL the definition set out Annex 2 Glossary NPPF is used for BtR. It states that BtR is purpose built housing that is typically 100% rented out. Schemes will usually offer longer tenancy agreements of three years or more and will typically be professionally managed stock in single ownership and management control.

### ***Purpose built student accommodation***

- 3.9** The PBSA typologies are based on a review of planning applications and discussion with the council around potential future development. Eight recent market PBSA schemes in Exeter totalling 1,777 bedspaces were reviewed, with the smallest at 15 bedspaces and the largest at 577 bedspaces.
- 3.10** For the purposes of testing and for the implementation of CIL, PBSA is housing built specifically by developers for students to live in, usually taking the form of cluster flats (many rooms with shared kitchen and living areas), or private studios, both with attached leisure and communal facilities (for example, cinemas, gyms, and games rooms).

### ***Co-living***

- 3.11** There are currently two permitted co-living schemes (one of them under construction) in Exeter and these are the basis for the typologies. Feedback from the stakeholder consultation has suggested that whilst the range of sites was suitable the densities were considered to be too high, therefore these have been reduced to reflect the comments.

**3.12** For the purposes of testing and for the implementation of CIL it is assumed that co-living developments are a purpose-built managed rental block, comprising small private living units with communal facilities, under single professional management. There are clearly delineated private and communal elements. The private units would provide adequate functional living space and layout and there is a range of communal facilities and services envisaged, including (for example) access to a communal kitchen, workspace, indoor and outdoor amenity spaces, laundry facilities, and bedlinen/cleaning services.

**Table 3.1 Typologies**

Reference	Units	Greenfield /Brownfield	Gross ha	Net ha	Units per net ha	Storey height
<b>Flatted typologies</b>						
Res1	15	GF	0.1	0.1	150	4
Res2	15	BF	0.1	0.1	150	4
Res3	75	BF	0.268	0.268	280	4
Res4	150	BF	0.5	0.5	300	5
Res5	350	BF	1.167	1.167	300	5
<b>Build to rent</b>						
BtR1	150	BF	0.5	0.500	300	5
BtR2	350	BF	1.167	1.167	300	5
BtR3	350	BF	0.35	0.35	1,000	10
<b>Purpose built student accommodation</b>						
PBSA1	40	BF	0.05	0.05	844	3
PBSA2	100	BF	0.09	0.09	1,094	5
PBSA3	250	BF	0.27	0.27	938	6
<b>Co-Living</b>						
CoL1	40	BF	0.05	0.05	500	5
CoL2	100	BF	0.2	0.2	500	5
CoL3	250	BF	0.5	0.5	500	5

## Chapter 4 Assumptions

### Mix and unit size

- 4.1** For each typology, a mix of units was devised. These mixes were based on NDSS<sup>2</sup>, housing delivery including data from land registry/epc records<sup>3</sup> and planning applications. They were agreed with the council and also presented as part of the stakeholder consultation.
- 4.2** In terms of the market flats a blended net unit size is used based on the average size of delivered flats over the past five years (taken from land registry/epc records) - this will include 1 – 4 bed spaces. The affordable is also a blended net size but based on NDSS. The flatted schemes have an allowance of 15% on top of the net 'saleable' floor area to allow for circulation, plant and common areas. Affordable housing percentage and tenures follow council policy as described in para 2.4 of this report.
- 4.3** The BtR units are considered likely to be a similar size to market units within flatted developments and whilst the standard 15% (and 20%<sup>4</sup> for the taller 10 storey typology) for circulation etc is added, consultation feedback suggested that BtR schemes also have additional communal space (for example workspace, lounge, communal kitchen, games room/cinema and gym). Based on a recent application in Exeter an addition 3 sqm /per unit is added to all BtR units. Affordable allowances follow national guidance as set out in para 2.5 of this report.
- 4.4** For the PBSA, based on a review of recent schemes it is assumed a mix of 70% ensuite cluster flat rooms and 30% studio based on the average split in the recent Exeter schemes reviewed. The average PBSA gross room size includes this mix. There is no requirement for affordable housing.
- 4.5** For co-living it is assumed 70% studios and 30% ensuite cluster flat rooms.
- 4.6** Affordable allowances follow national guidance and practice in Exeter as set out in para 2.5 of this report.

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<sup>2</sup> Nationally Described Space Standards (NDSS) - <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>

<sup>3</sup> Land registry records are addressed matched with Environmental Performance Certificates (EPC) to provide data on values per sqm and average unit sizes by unit type e.g. flats.

<sup>4</sup> It is acknowledged that as building height increases it is necessary to include additional 'cores' to address accessibility and fire risk, this increases the circulation space.

Table 4.1 Unit mixes, sizes and tenures<sup>5</sup>

Unit types	Flatted	BtR flats	PBSA	Co-Living
Market sq/m (blended)	NIA: 66 GIA: 78	NIA: 66 GIA: 81 or GIA: 86	Gross room size: 32	Gross room size: 35
Affordable - social sq/m (blended – 1 to 2 bed)	NIA: 56 GIA: 66	NIA: 66 GIA: 78	-	Gross room size: 35
Affordable - home ownership sq/m (blended – 1 – 2 bed)	NIA: 60 GIA: 71	-	-	-
Affordable – discount market rent		NIA: 60 GIA: 74 or GIA: 78		
<b>Market and affordable housing mix</b>				
Market tenure	65%	80%	100%	80%
Affordable tenure	35%	20%	-	20%
<b>Affordable housing tenures</b>				
Affordable social rent mix	70%	-	-	-
Affordable home ownership mix	30%	-	-	-
Discount market rent mix	-	100%	-	100%

## Values – flatted development

### Market values

**4.7** The set of the market values in Exeter was derived from an analysis of new build Land Registry data listed as flats from November 2015 to November 2021, indexed to November 2021. The Land Registry data was matched to Energy Performance Certificates to enable a value per sq m to be generated for flats. This is then grossed up by the blended average unit size to provide an approximate 'flats' value. The detailed transactions are set out in Appendix B.

**4.8** It should be noted that the previous data presented as part of the stakeholder consultation included a substantial number of transactions for specialist older person accommodation. These were inflating both the £/sqm values and the unit sizes and have now been removed from both the data informing values and unit sizes.

Table 4.2 Market sales values £/sqm

Unit Type	Flatted
Per sqm	£3,654
Per unit	£257,333

**4.9** To 'sense' check these values, advertising prices shown on Right Move (March 2022) for

<sup>5</sup> Some figures may be rounded

properties in Exeter were reviewed. At the time only a limited number (8) of new build properties were being advertised on just four separate schemes. All of these are located in the most desirable areas of the city with the highest values and therefore are not representative of average values, even if accounting for an advertised price premium over actual sale price.

**4.10** The individual property details are set out in Appendix C and as summarised in Table 4.3 they all far exceed the £/sqm set out in Table 4.2. They are generally marketed at luxury apartments and are significantly larger than a more standard flatted product.

**Table 4.3 Advertised market values**

Scheme	Home type	Price advertised
Spicer Road	2 bed flat x 2 – 82.1 sqm	£449,000 (£5,468/sqm)
Barnfield Gate	2 bed flat – 75.8 sqm	£495,000 (6,530/sqm)
Newberry Lodge	2 bed flat – 92 sqm	£500,000 (£5,435/sqm)
Barnfield Gate	2 bed flat – 79.1 sqm	£530,000 (£6,700/sqm)
Colleton Crescent	2 bed flat – 87.4 sqm	£750,000 (8,581/sqm)
Barnfield Gate	2 bed flat – 120.6 sqm	£POA
Colleton Crescent	3 bed flat – 169.8 sqm	£1,250,000 (£7,362/sqm)

#### Affordable values

**4.11** Social rent and shared ownership affordable housing transfer values are estimated on a capitalised net rent basis. Social rents are assumed to be 60% of the market rent (blended 50/50 between 1 bed and 2 bed). First Homes follow the PPG guidance with a 30% discount on market values.

**Table 4.4 Affordable housing values**

Social rent		Shared ownership	
Rents	Social rent blended - £100pw	Share size	35%
Service charge	£10 per unit	Rental charge	2.5%
Management and maintenance	£1,000	Capitalisation	4.5%
Voids/bad debts	3%	Value/unit	£155,000
Repairs reserve	£600	<b>First Homes</b>	
Capitalisation	4.5%	Value approach	30% discount market
Value/unit	£76,000	Value/unit	£153,000

#### Values – BtR development

**4.12** The BtR values are calculated by using market rental data, adjusting for operation/management, sinking fund and voids and then a capitalisation. The market rents are based on a range of

Exeter private rent data, including ONS Private Rental Market Statistics, Property Data<sup>6</sup>, Rightmove and responses to the stakeholder consultation. As with the flatted development a blended rate is used with the proportions of different unit sizes being drawn from an Exeter BtR planning application as a reasonable proxy to potential future development. The discount market rent is calculated following national guidance of a 20% discount, i.e. 80% of the market value.

**4.13** The adjustments and capitalisation figures are based on a review of market reports and local viability appraisals as well as experience elsewhere undertaking similar assessments. These figures were adjusted following consultation with a slight increase on the discounts for operating costs etc and a small reduction in the yield recognising that BtR is yet to be proven within Exeter.

**Table 4.5 Build to rent values £/sqm**

Unit Type	BtR
Rent per month	£1,250
Less operating costs, sinking funds & voids	26%
Capitalisation rate	5%
Market value/unit	£222,000
Discount market value/unit	£177,600

### Values – PBSA and co-living development

**4.14** PBSA values are taken from the room rates for the 2022-23 academic year, based on a spread of eight PBSA schemes operating in Exeter. This exercise takes account of the different weeks let arrangements operated by different providers. The capitalised net value for PBSA takes account of the 30% studio:70% cluster flat ensuite.

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<sup>6</sup> Property Data is a subscription service that provides data on property transactions including rental.

**4.15** Co-living values are not yet available within Exeter as there are not any known purpose build schemes operating. It is known from locations elsewhere that Co-Living rents are generally an uplift on PBSA rents and following the stakeholder consultation responses we have applied a 10% uplift<sup>7</sup>. It is assumed that Co-Living bed spaces will churn one to two times a year and therefore the rent is set at 48 weeks, rather than 52 to allow for transition. Operating costs, including replacement value etc at 35% are similar to those used for PBSA and within ranges used elsewhere. The yield is not easy to ascertain – CBRE report that yields for Co-Living are normally between PBSA and BtR (which would equate to 4.88% in Exeter) – however as this is a new market, we take the more cautious position of setting them at the same rate as the more mature Exeter PBSA figure of 5.25%.

**Table 4.6 Market sales values £/sqm**

Unit Type	PBSA	Co-Living
<b>Weekly rent</b>	Cluster flat ensuite £164 (51 weeks) Studio £215 (51 weeks)	Market: £237 DMRt: £190
<b>Rent per annum</b> (assumes 51 weeks for PBSA & 48 weeks for Co-living)	Cluster flat ensuite £8,344 Studio £10,963	Market: £11,883 Discount: £9346
<b>Less operating costs/sinking fund</b>	30%	30%: £3505
<b>Yield</b>	5.25%	5.25%
<b>Per Room (rounded)</b>	£121,700	Market: £145,182 DMR: £103,701

## Benchmark land values

**4.16** The approach to benchmark land values is based on PPG and uses an existing use value plus a premium.

**4.17** In order to establish existing use land values we have reviewed the estimates for Exeter from DLUHC (formerly MHCLG)<sup>8</sup> as well as the existing use and benchmark land values used in Exeter site specific viability studies<sup>9</sup> used for s106 negotiations.

## Greenfield land existing use value

<sup>7</sup> In other locations where Co-living is more established the uplift can be in the region of 30% so the assumptions used here are conservative.

<sup>8</sup> DLUHC, 2020, Land Value Estimates for Policy Appraisal

<sup>9</sup> Provided by Exeter City Council on a confidential basis

**4.18** The DLUHC estimate for agricultural land in the Heart of the SW LEP area is £23,000 per ha. A limited number of the site-specific viability studies were for sites on greenfield land and of those that were, values in the region of £20,000 per ha were used, based on previous area-wide viability studies.

**4.19** For the purposes of this study the single development typology assumed to be on greenfield land is small scale and paddock land will be a better existing use than standard agricultural land. Paddock land may have a higher value due to amenity and equestrian uses, and although it can vary considerably, it is typically around twice the value of larger scale agricultural land. For the small-scale greenfield site used in this testing we have assumed a paddock land existing use value of £50,000 per ha.

#### ***Brownfield land existing use value***

**4.20** The DLUHC estimates for Exeter brownfield land are:

- CBD office land - £2,500,000 per ha
- Out of centre office land - £990,000 per ha
- Industrial - £900,000 per ha

**4.21** Brownfield land values used in site-specific negotiations combined a mix of existing use plus a premium, and other estimates.

- The brownfield existing use estimates ranged from approximately £330,000 per ha to £18,000,000 per ha, with the highest of these based on existing city centre prime commercial uses.
- Within the wider range above, there was a set of brownfield land sites on former commercial premises. Again these varied according to the existing use but suggested a narrower range between approximately £750,000 - £850,000 per ha and £1,000,000-£2,300,000m per ha.

**4.22** It is clear that brownfield land existing use values can vary significantly and that there are situations where brownfield land existing use values in Exeter can be significantly lower (or higher) than the DLUHC estimates. However, for the higher density housing, PBSA and co-living uses being considered in this study we have used the DLUHC out of centre office land existing use value of £990,000 per ha, which sits within the site-specific viability former commercial premises range.

#### ***Premium over existing use***

**4.23** The Homes and Communities Agency, 2010, Annex 1 (Transparent Viability Assumptions) states “Benchmarks and evidence from planning appeals tend to be in a range of 10% to 30% above EUV in urban areas. For greenfield land, benchmarks tend to be in a range of 10 to 20 times agricultural value” (page 9).

**4.24** We use the mid point in these ranges with a premium of 20% over existing use value for brownfield land and a premium of 15 times for greenfield land.

### **Benchmark land values**

**4.25** The study uses a small greenfield site benchmark land value of £750,000 per ha and a brownfield site benchmark land value of £1,200,000 per ha.

**Table 4.7 Existing use, premiums and benchmark land values**

Existing use	Estimated value/ha	Premium	Benchmark/ha
Greenfield (paddock)	£50,000	15x	£750,000
Brownfield	£990,000	20%	£1,188,000

### **Costs**

#### **Build and development costs**

**4.26** Build costs can vary due to location, development type, proposed tenure type, proposed tenure mix, storey height, and building use. The Build Cost Information Service (BCIS) provides benchmarking information for build costs, adjusted for the location.

- Residential build costs are based on actual tender prices for new builds over a 5-year period and the tender price data is rebased to Q4 2021 (in line with values) and Exeter prices using BCIS defined adjustments, to give the build costs for different types of schemes. There is no evidence put forward to suggest that build costs £per sqm vary between flatted developments and BtR, however they will vary by height.
- PBSA build costs are based upon the BCIS 5-year mean
- There is no Co-Living category in BCIS but work elsewhere<sup>10</sup> has indicated a cost uplift of 8.751% over PBSA. We have used this uplift over the Exeter 5-year mean PBSA figures for this study.

<sup>10</sup> Three Dragons for Salford City Council, 2021, Local Plan Viability Assessment – Addendum Report

**4.27** In addition to the base build costs, allowances are made of 10% on build costs for external works with additional allowances for site infrastructure costs (depending on site size). Table 4.8 & 4.9 illustrates the BCIS rates (see Appendix D) and shows how they are applied to the different typologies in the testing.

**4.28** There is a range of other standard costs that need to be applied when undertaking the viability testing. These were all tested through the consultation and are based on PPG, experience of other high level plan making viability testing, local information from ECC, including site specific discussions and a review of the latest set of viability assessments that have been subject to an examination process (either Local Plan or CIL) and an Examiners Report. Thus, they are a standard set of assumptions that should not be controversial or subject to any significant challenge given they are based on accepted and examined practice, both local and national.

**4.29** Further information providing background to some of the costs is set out in the following table 4.8 & 4.9. The final column sets out the source for each of the proposed assumptions.

**Table 4.8 Other flatted and BtR development costs**

Development cost	Assumption	Source
<b>General build cost</b>		
Base build costs	3-5 storey - £1,446/sqm (Res1-5 & BtR1-2) 6 + storey - £1,565/sqm (BtR3)	BCIS costs for Mean 3-5 & 6 plus storey relating to Exeter and Q4 2021 prices
Plot costs	10%	Three Dragons standard assumption
Professional fees	8% build/plot	Three Dragons standard assumption – originally 6% for sites of 101+units, increased to 8% reflecting consultation feedback
Infrastructure/site costs	10 – 100 units: £5,000 per unit 101+ units: £10,000 per unit	Three Dragons standard assumption
Part L 2021 building regulations costs (building standards)	£2,260 per unit	Government impact assessment
Part S 2021 building regulations (EV charging)	Res 1 & 2 - £865/EV applied to each unit Res3 to 5 and BtR 1-3 - £865/EV applied to 5% units	Government impact assessment
Fire safety regulations	RES 4 & 5 and BtR 1-3 - £1,500 per unit	Government impact assessment

Development cost	Assumption	Source
Biodiversity Net Gain	£270 per unit on brownfield & £998 per unit on greenfield	Government impact assessment
<b>Policy costs</b>		
S106 costs	Res 1 & 2 - £1,500 per unit Res 3 to 5 and BtR 1 & 2 - £4,500 per unit	Recent ECC S106 agreements
Habitats mitigation	£1,130 – where no CIL collected	ECC policy Habitat Mitigation rates (includes both Exe Estuary and Pebblebed Heaths)
Part M4(3) costs	Assumed that 5% of social rented flats are able to accommodate wheelchairs at a cost of £17,999 per unit	ECC policy / cost derived from EC Harris report
<b>Other fees, finance, and return</b>		
Finance rate	6%	of all costs including land
Marketing/sales/fees	3% of GDV for market sales housing/BtR/First Homes	Three Dragons standard assumption
Further legal costs and administration costs	£500 legal costs per AH (social/SO) £150 additional costs First Homes	Three Dragons standard assumption
Developer return	17.5% market GDV 6% AH GDV 10% Build to Rent GDV	Three Dragons standard assumption
Agents and legal (land)	1.75% of land value	Three Dragons standard assumption
SDLT	Prevailing rate	HMRC
Delivery Rates	12 months to 1st completions 40pa thereafter	Three Dragons standard assumption

Table 4.9 Other PBSA and co-living development costs

Development cost	Assumption	Source
Base build costs	PBSA: £1,838 per sqm Co-living: £1,996 per sqm	BCIS mean costs for PBSA relating to Exeter and Q4 2021 prices – no BCIS figure for Co-Living, therefore an

		8.6% uplift on PBSA is used based on uplifts used in other areas.
Building standards	2.5% of base build costs	Based on percentage uplift on flats using BCIS flat build cost for Exeter and Government impact assessment
Plot costs	10%	Three Dragons standard assumption
Professional fees	8%	of build and plot/external costs
Sales & letting costs	3% of GDV	Three Dragons standard assumption
Purchaser costs	Capital value divided by 6.8%	Three Dragons standard assumption
S106 costs	PBSA: £200 per bed space Co-Living: £1,600 per bed space	Based on recent S106 agreements and includes habitat mitigation for co-living
Other planning costs	£865 per EV charger (co-living) £18,470 per hectare Biodiversity Net Gain £20 /sqm fire safety	Costs from Government impact assessment/other studies – EV assumption is 1EV charger per 50 units based on planning applications
Finance rate	6%	of all costs including land value
Build period	PBSA/CoL 1: 12 months PBSA/CoL 2: 18 months PBSA/CoL 3: 24 months	Three Dragons standard assumption
Developer return	10% scheme value	Three Dragons standard assumption
Agents and legal	1.75% of land value	Three Dragons standard assumption
SDLT	Prevailing rate	HMRC

**Policy and other requirements**

Three Dragons

22

- 4.30 Biodiversity net gain** - The allowance for biodiversity gain is drawn from the government's impact assessment<sup>11</sup> which was published with the consultation on the amendments to the Environment Act. However, it should be noted that, as biodiversity net gain is site specific depending on both the existing site characteristic and the ability of development form to both mitigate and provide additional gain, it is difficult to gauge a suitable allowance for meeting the requirements. It is also of note that the NHBC with the RSPB have recently issued guidance on how to achieve net gain within new development. At the launch of the guidance both the authors and one of the major housebuilders (Barratt Homes) emphasised that incorporating measures for biodiversity net gain during the design phase meant additional costs were minimal. This suggests that, whilst an allowance is included, the actual cost could be much lower and therefore the testing allowances are a conservative estimate.
- 4.31 EV charging** - An allowance for 'fast charge' electric vehicle charging points is made for all parking spaces as per Part S Building Regulation 2021. It is assumed that parking spaces will be available on a per unit basis for RES1 - 2 and on 5% of units for RES 3-5 and BtR 1-3 on the basis that this form of development is most likely to be located within a central and accessible location where standard parking spaces will not be encouraged. For Co-living the number of parking spaces are likely to be even less and therefore 1 space for every 50 units/bedspace is assumed. PBSA is assumed to have no parking. The EV charger costs are based upon the impact assessment produced by the government<sup>12</sup>.
- 4.32 Accessibility** - The accessibility requirements are interpreted as seeking 5% of the social rented flats as M4(3). This requires a significant cost allowance of £17,999 per each of the qualifying units.
- 4.33 Habitat mitigation** – mitigation is required for much of new development across Exeter. Developments within 10km of the Exe Estuary SPA are required to pay a contribution of £859.00<sup>13</sup> per residential unit. Developments within 10km of the Exe Estuary SPA and within 10km of the East Devon Pebbled Heaths SAC and SPA are required to pay a fee of £1130.00<sup>14</sup> per residential unit. The contribution has been calculated from the total costs of the projects in the mitigation strategy<sup>15</sup> which are divided by the number of houses to be built in the areas impacting upon the protected habitats. This produces a 'per dwelling' habitats mitigation financial contribution.
- 4.34** It is important to note that the full allowance of £1,130 is applied but only where development will not provide any CIL payment. Where a positive CIL amount is required then ECC have

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<sup>11</sup> MHCLG, 2019, Biodiversity net gain and local nature recovery strategies impact assessment

<sup>12</sup> MHCLG, 2019, Residential charging infrastructure provision impact assessment

<sup>13</sup> Figure provided by ECC - <https://exeter.gov.uk/planning-services/payments-from-developers/habitats-mitigation/habitats-mitigation-rates/>

<sup>14</sup> Ibid

<sup>15</sup> South East Devon European Site Mitigation Strategy

confirmed that practice is to collect the habitat mitigation payment from the CIL contribution.

- 4.35 Other s106 requirements** - The level of s106 allowed for in the viability testing is based on a review of s106 agreements provided by the council for each of the development types and in the case of flatted and BtR development will vary according to size of scheme. The s106 payments were typically for education, open space, community and transport contributions. The council has advised that they will continue to seek these types of site-specific mitigation as s106, rather than CIL and therefore it is important to include them within the testing.
- 4.36 Building standards** - the government confirmed that changes to Part L changes building regulations will come into force in the summer 2022 and therefore the costs associated with this change from the 2013 building regulations will need to be included within this testing. We refer to government's own impact assessment as the source of the costs set out in Table 4.10.
- 4.37 Fire** – an allowance for fire safety measures is included in the typologies of four or more storeys. For flatted development and BtR this is based on the government impact assessment costs; and for PBSA and Co-Living we use the £/sqm equivalent as flats.
- 4.38 Sales and build cashflow** – for flats and BtR we assume 12 months to first completion and 40 dwellings per annum thereafter. Values are cashflowed a year following the build costs and the infrastructure costs are incurred in the early parts of the development. For PBSA and Co-Living we assume 12-24 months build period, depending on the size of the scheme.

## Chapter 5 Testing and analysis

- 5.1** This chapter summarises results of the viability testing to inform the partial review of ECC CIL. As noted in the testing assumptions earlier, the modelling includes general development costs, affordable housing where applicable, s106, as well as a set of additional policy costs. Each typology has been subjected to a detailed appraisal, complete with cashflow analysis.
- 5.2** The results are summarised below, with the full residential testing results in Appendix E and appraisal summary sheet examples (one for each typology) also in Appendix E. The results are presented as net viability 'headroom' per typology after all costs including construction and other development costs (fees, return, policy costs and land costs) have been deducted. The same figures are also presented as £/sqm 'CIL headroom' (i.e. the headroom divided by the CIL liable floorspace. Where the headroom is positive the typology can be considered viable and therefore potential for a positive CIL charge.

### Flatted development typologies results

- 5.3** Five typologies were tested on greenfield sites, Res1 15 units and on brownfield sites Res2 15 dwellings, Res3 75 dwellings, Res4 150 dwellings and Res5 350 units. Development costs have varied according to the size of the proposed development as set out in the assumptions chapter (4) - there is an allowance for habitat mitigation. Results for the flatted typologies are shown in the following table.
- 5.4** As some of the results are negative or marginal, it is anticipated that the council may wish to set a £zero rate for CIL, therefore an allowance for a separate payment for habitat mitigation (as set out in table 4.8) is included within this testing.

**Table 5.1 Flatted typologies testing results**

Typology	Description	Units	Scheme headroom (£/typology) including BLV and return	CIL headroom (£/sqm)
Res 1	GF flatted scheme	15	£37,470	£44
Res 2	BF flatted scheme	15	£511	£1
Res 3	BF flatted scheme	75	£367,981	£87
Res 4	BF flatted scheme	150	-£502,042	-£59

Res 5	BF flatted scheme	350	-£400,175	-£20
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### Commentary on flatted testing results

- The two larger schemes are not viable
- Res 1 and Res 2 are viable but arguably marginal
- Res 3 is viable but with a small headroom from which to draw CIL

### BtR development typologies results

**5.5** Three typologies were tested on brownfield sites BtR1 150 units, BtR2 350 units and BtR3 350 units. Development costs have varied according to the size of the proposed development as set out in the assumptions chapter (4). Results for the BtR typologies are shown in the following table.

**5.6** As the results shown in Table 5.2 are positive, suggesting potential for CIL, no habitat mitigation allowance is included in this testing as it is anticipated that any requirements for payment towards mitigation will be met by the council via the CIL receipt.

**Table 5.2 BtR typologies testing results**

Typology	Description	Units	Scheme headroom (£/typology) including BLV and return	CIL headroom (£/sqm)
BtR 1	BF flatted scheme	150	£3,029,596	£313
BtR 2	BF flatted scheme	350	£8,103,563	£359
BtR 3	BF flatted scheme	350	£1,275,099	£53

### Commentary on BtR testing results

- All BtR schemes are viable and capable of supporting a CIL charge
- The different model of housing provision is clearly distinct in viability terms when compared to the standard 'for sale' flatted development – suggesting a different approach to CIL is justified

- Whilst the schemes are positive, this needs to be considered carefully within the context of an immature market in terms of this form of development in Exeter
- The more dense and importantly 'taller' BtR 3 typology is significantly less viable than BtR 1 and BtR 2, suggested that when setting CIL, rates should reflect the potential for different economics for different types of BtR development in terms of scale.

## PBSA development typologies results

**5.7** Three typologies were tested on brownfield sites PBSA1 40 units, PBSA2 100 units and PBSA3 250 units. Development costs have varied according to the size of the proposed development as set out in the assumptions chapter (4). Results for the PBSA typologies are shown in the following table.

**Table 5.3 PBSA typologies testing results**

Typology	Description	Units	Scheme headroom (£/typology) including BLV and return	CIL headroom (£/sqm)
PBSA 1	BF flatted scheme	40	£856,570	£669
PBSA 2	BF flatted scheme	100	£1,868,439	£584
PBSA 3	BF flatted scheme	250	£4,061,102	£508

### Commentary on PBSA testing results

- The PBSA typologies tested are all viable and continue to be able to support CIL.
- The theoretical maximum headroom for CIL is between £508-£669/ sqm, although this is before any buffer.

## Co-living development typologies results

**5.8** Three typologies were tested on brownfield sites CoL1 40 units, CoL2 100 units and CoL3 250 units. Development costs have varied according to the size of the proposed development as set out in the assumptions chapter (4). Results for the co-living typologies are shown in the following table.

Table 5.4 Co-living typologies testing results

Typology	Description	Units	Scheme headroom (£/typology) including BLV and return	CIL headroom (£/sqm)
CoL 1	BF flatted scheme	40	£384,370	£343
CoL 2	BF flatted scheme	100	£678,939	£242
CoL 3	BF flatted scheme	250	£979,209	£140

#### **Commentary on Co-living testing results**

- All co-living schemes are viable and capable of supporting a CIL charge
- The different model of housing provision is clearly distinct in viability terms when compared to both BtR and the standard 'for sale' flatted development – suggesting a different approach to CIL is justified
- Whilst the schemes are positive, this needs to be considered carefully within the context of an immature market in terms of this form of development in Exeter
- The more dense and importantly 'taller' schemes are less viable than those with more limited heights, so type of future development should be a consideration when setting CIL

## Chapter 6 Setting a CIL rate

### Setting a CIL charge - parameters

- 6.1** In coming to a view over an appropriate CIL charge the council will need to consider as to what an examiner will be concerned about when reviewing the proposed charges and supporting evidence. The Examiner will consider whether the schedule is compliant in legal terms with the 2008 Act and 2010 Regulations (as amended) and whether it is reasonable, viable and consistent with national guidance in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). To fulfil relevant legislative requirements the charging schedule should set an appropriate balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across the district.
- 6.2** There is no prescribed approach to setting a CIL rate and the preferred method varies across councils that have implemented CIL. As per best practice the council will need to be informed by the evidence on CIL headroom but does not have to follow prescriptively the results of the testing. A judgement needs to be made based on a range of factors that are bespoke to ECC and ultimately the balance between funding infrastructure and delivering the plan. Therefore, there are a number of considerations for the council:
- the data on values shows that Exeter is a relatively high value area
  - whilst house prices are high, delivery may slow as allocated sites are built out. Ensuring planned delivery and windfall homes come forward should be a consideration for the council in setting an appropriate CIL rate.
  - simplicity of charging zones – whilst the guidance suggests that CIL should be easily understandable and minimise the need for multiple charging zones and development types, they also need to reflect in viability terms any apparent differences in viability and ability to support infrastructure provision
  - market shock - the contributions that could be sought from development based on the viability tests are for some typologies in excess of those that the council currently charge - a large step change could potentially have an effect on future delivery, when the CIL is in place
  - future changes to building regulations to move towards carbon net zero development have been indicated for 2025, which is within the Core Strategy plan period - whilst it is unclear as to how these will be brought forward, it is likely there will be additional building costs to take into account at that time
  - immature markets – neither BtR or co-living is currently available in Exeter. Whilst applications have been permitted these were relatively recently and are yet to be fully built out. Therefore a degree of caution needs to be exercised by the council, whereby thought

should be given to setting a relatively low CIL initially until these markets are more established – at the next review of CIL these could then be reconsidered.

- buffer – whilst there is no method prescribed to setting the CIL rate, guidance does suggest that the rate should not be at the margin of viability; in other words the CIL rate should not generally be set the same as the total headroom available – a buffer should be incorporated<sup>16</sup>
- reasonableness – some councils (and Examiners) have come to a view that a CIL rate which is set at no more than 5% of GDV is generally acceptable and unlikely to put development at risk whether a site is viable or not and lower proportions of 1-2% of GDV is effectively *deminimus*, i.e. without impact<sup>17</sup>

### Flatted development rate setting (sale)

- 6.3** In terms of setting an appropriate rate for flatted development it is recommended that the Council considers reducing the CIL to £0/sqm. This reflects the marginal viability for this form of development in Exeter.

### BtR development rate setting

- 6.4** In terms of setting an appropriate rate for BtR development it is recommended that the Council considers £50/sqm. This recognises that this is a relatively untried form of development in the city, provides a substantial buffer and remains less than 5% of GDV.

### PBSA development rate setting

- 6.5** In terms of setting an appropriate rate for PBSA it is recommended that the Council considers £150/sqm. This is an increase over the 2022 rate of £59/sqm and represents 4% of GDV.

### Co-living development rate setting

- 6.6** In terms of setting an appropriate rate for Co-Living it is recommended that the Council considers £50/sqm. This recognises that this is a relatively untried form of development in the city, provides a substantial buffer and remains less than 5% of GDV.

### Summary and conclusions

- 6.7** We have based proposed CIL rates on results achieved separately for all the tested typologies and separate positive rates are proposed for BtR, PBSA and co-living.

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<sup>16</sup> The buffers used in other CIL studies have varied, but generally fall around 30-50%.

<sup>17</sup> E.g. Planning Inspectorate, 2012, Report on the examination of the draft mayoral community infrastructure levy charging schedule Para 48 ...” 1% is within the margin of error for most valuations and cannot be said to generally represent an intolerable burden.” See also Planning Inspectorate, 2019, Chiltern District Council and South Bucks District Council CIL examination report.

- 6.8** The result of the testing shows that most of the typologies are viable. Whilst flatted development is marginal or unviable it would pose a risk to delivery with positive CIL rate, however it will still be expected to contribute toward s106, including both habitat mitigation and affordable housing.
- 6.9** BtR is currently subject to the full rate, which will be challenging to achieve on higher developments. Co-living currently does not attract any CIL and therefore as it is viable to do so it is reasonable to expect a contribution to infrastructure provision through CIL. For simplicity whilst both these forms of development have different characteristics, the same CIL charge is recommended.
- 6.10** In terms of PBSA it is already subject to a CIL charge, although this was set at a time where this form of development was relatively untested. The market for PBSA in Exeter has matured and with potential for more in the future it is reasonable that this has been reviewed and a higher charge recommended.
- 6.11** Proposed and retained (as indexed 2022) CIL rates are set out in the table below:

**Table 6.1 Proposed and current CIL rates**

Zone and/or use	Proposed/retained CIL rate
<b>Revised or new rates</b>	
Flatted development	£0 / sqm (replaces current rate £118.57)
Build to rent	£50 / sqm (replaces current rate £118.57)
Purpose built student accommodation	£150 / sqm (replaces current rate £59.29)
Co-living	£50 / sqm (replaces current rate £0)
<b>Current rates 2022 retained</b>	
Residential development excluding flats	£118.57
Out of centre retail	£185.27
Other forms of development not listed above	£0

- 6.12** The rates proposed could be higher with a reduced buffer, however they are already generally an increase on what the Council is currently collecting through a combination of affordable homes contributions and s106 requirements and through this more cautious approach reflect concerns in terms of market shock.
- 6.13** The analysis in this report has used current values and costs, as previously promoted in the guidance. But we and the council are aware that both can change over time. It is important that the council keeps values and costs under review. We recommend that the main build costs and market and rental values are monitored regularly (at least annually) using published sources and that the development industry is consulted on these and other changes that can affect viability (e.g. interest rates and developer returns). A sustained change in the key variables should trigger a review of CIL and/or the affordable homes policy. In any case, the council should consider a regular review of CIL (say when/after the new Exeter Plan is nearing adoption)

but noting that a review does not have to lead to a revised rate.

## Appendix A - National policy requirements viability testing

### National policy context

1. **National framework** - The National Planning Policy Framework (NPPF) recognises the importance of positive and aspirational planning but states that this should be done 'in a way that is aspirational but deliverable'<sup>18</sup>.
2. The NPPF advises that cumulative effects of policy should not combine to render plans unviable:
 

*'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.'*<sup>19</sup>
3. The government has signalled its desire to simplify the planning process, including development contributions. The NPPF advises that:
 

*'All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.'*<sup>20</sup>
4. In terms of affordable homes the government has reiterated previous policy on affordable homes thresholds and a desire to increase affordable home products that can potentially lead to home ownership:
 

*'Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount'*<sup>21</sup>

*'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.'*<sup>22</sup>
5. With regard to non-residential development, the NPPF states that local planning authorities should:

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<sup>18</sup> DLUHC, 2021 NPPF Para 16

<sup>19</sup> DLUHC, 2021 NPPF Para 34

<sup>20</sup> DLUHC, 2021 NPPF Para 58

<sup>21</sup> DLUHC, 2021 NPPF Para 64

<sup>22</sup> DLUHC, 2021 NPPF Para 65

*'set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth...local policies for economic development and regeneration...seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment...be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.'*<sup>23</sup>

6. However, the NPPF does not state that all sites must be viable now in order to appear in the plan. Instead, the NPPF is concerned to ensure that the bulk of the development is not rendered unviable by unrealistic policy costs. It is important to recognise that economic viability will be subject to economic and market variations over the local plan timescale. In a free market, where development is largely undertaken by the private sector, the local planning authority can seek to provide suitable sites to meet the needs of sustainable development. It is not within the local planning authority's control to ensure delivery actually takes place; this will depend on the willingness of a developer to invest and a landowner to release the land. So, in considering whether a site is deliverable now or developable in the future, we have taken account of the local context to help shape our viability assumptions.
7. **Planning Practice Guidance** - Planning Practice Guidance<sup>24</sup> (PPG) provides further detail about how the NPPF should be applied. PPG contains general principles for understanding viability (also relevant to CIL viability testing). The approach taken reflects the latest version of PPG. In order to understand viability, a realistic understanding of the costs and the value of development is required and direct engagement with development sector may be helpful<sup>25</sup>. Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability, with further detail for strategic sites that provide a significant proportion of planned supply<sup>26</sup>.
8. For a specific site, values should be based on market evidence (rather than average figures) from the actual site<sup>27</sup>. All development costs should be taken into account, including within setting of benchmark land values, in particular para 012 within the PPG Viability section states that:

*'Costs include: build costs based on appropriate data, for example that of the Building Cost Information Service*

- *abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value.*
- *site-specific infrastructure costs, which might include access roads, sustainable drainage systems, green infrastructure, connection to utilities and decentralised energy. These costs should be taken into account when defining benchmark land value.*

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<sup>23</sup> DLUHC, 2021 NPPF, para 82

<sup>24</sup> DLUHC, Planning Practice Guidance

<sup>25</sup> PPG Paragraph: 010 Reference ID: 10-001-20180724

<sup>26</sup> PPG Paragraph: 005 Reference ID: 10-004-20180724

<sup>27</sup> PPG Paragraph: 011 Reference ID: 10-011-20180724

- *the total cost of all relevant policy requirements including contributions towards affordable housing and infrastructure, Community Infrastructure Levy charges, and any other relevant policies or standards. These costs should be taken into account when defining benchmark land value.*
  - *general finance costs including those incurred through loans.*
  - *professional, project management, sales, marketing and legal costs incorporating organisational overheads associated with the site. Any professional site fees should also be taken into account when defining benchmark land value.*
  - *explicit reference to project contingency costs should be included in circumstances where scheme specific assessment is deemed necessary, with a justification for contingency relative to project risk and developers return.'*
9. Land values<sup>28</sup> should be defined using a benchmark land value that is established on the basis of Existing Use Value plus a premium for the landowner. The premium should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The benchmark should reflect the implications of abnormal costs, site specific infrastructure and fees. It can be informed by market evidence including current costs and values but that this should be based on development that is compliant with policies, where evidence is not available adjustments should be made to reflect policy compliance.
10. PPG states that developer return should be 15 - 20% of gross development value and that a lower figure may be more appropriate for affordable homes delivery<sup>29</sup>.
11. **Community Infrastructure Levy (CIL)** - CIL is payable on development which creates net additional floor space, where the gross internal area of new build exceeds 100 square metres (this limit does not apply to new houses or flats)<sup>30</sup>. Custom & self-build is exempt, along with affordable homes, charitable development, buildings into which people do not normally go and vacant buildings brought back into the same use<sup>31</sup>.
12. CIL rates should be set so that they strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments<sup>32</sup>.
13. For the purposes of CIL, a charging authority should use an area-based approach, involving a broad test of viability across their area. This should use appropriate available evidence, recognising that the available data is unlikely to be fully comprehensive. A sample of site types should be used, however more fine-grained sampling may be required where differential CIL rates

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<sup>28</sup> PPG Paragraph: 013 Reference ID: 10-013-20190509 and 014 Reference ID: 10-014-20190509

<sup>29</sup> PPG Paragraph: 018 Reference ID: 10-018-20190509

<sup>30</sup> PPG Paragraph: 001 Reference ID: 25-001-20190901

<sup>31</sup> PPG Paragraph: 005 Reference ID: 25-005-20190901

<sup>32</sup> PPG Paragraph: 010 Reference ID: 25-010-20190901

are set. Rates should be reasonable and include a buffer, but there is no requirement for a proposed rate to exactly mirror the evidence<sup>33</sup>.

14. Differential rates may be set in relation to geography, development type and/or scale. However undue complexity and disproportionate impact should be avoided. The charging authority should consider a zero CIL where plan policies require significant contributions towards homes or infrastructure through planning obligations<sup>34</sup>. The guidance for testing viability for plan-making and for setting CIL rates is closely aligned and so testing both together follows the same approach and can use common assumptions.

15. **Other guidance on viability testing for development** - Guidance has been published to assist practitioners in undertaking viability studies for policy making purposes - "*Viability Testing Local Plans - Advice for planning practitioners*"<sup>35</sup>. The foreword to the Advice for planning practitioners includes support from DHCLG, the LGA, the HBF, PINS and POS. PINS and the POS<sup>36</sup> state that:

*'The Planning Inspectorate and Planning Officers Society welcome this advice on viability testing of Local Plans. The use of this approach will help enable local authorities to meet their obligations under NPPF when their plan is examined'*

16. The approach to viability testing adopted for this study follows the principles set out in the Advice. The Advice re-iterates that:

*'The approach to assessing plan viability should recognise that it can only provide high level assurance'*

17. The Advice also comments on how viability testing should deal with potential future changes in market conditions and other costs and values and states that:

*'The most straightforward way to assess plan policies for the first five years is to work on the basis of current costs and values'. (page 26)*

18. But that:

*'The one exception to the use of current costs and current values should be recognition of significant national regulatory changes to be implemented.....' (page 26)*

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<sup>33</sup> PPG Paragraph: 020 Reference ID: 25-020-20190901

<sup>34</sup> PPG Paragraph: 026 Reference ID: 25-026-20190901

<sup>35</sup> The guide was published in June 2012 and is the work of the Local Housing Delivery Group, chaired by Sir John Harman, which is a cross-industry group, supported by the Local Government Association and the Home Builders Federation

<sup>36</sup> Acronyms for the following organisations - Department of Communities and Local Government, LGA Environment and Housing Board, Home Builders Federation, Planning Inspectorate, Planning Officers Society

## Principles of viability testing

19. The Advice for planning practitioners<sup>37</sup> summarises viability as follows:
20. 'An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.' (page 14)
21. Reflecting this definition of viability, and as specifically recommended by the Advice for planning practitioners, we have adopted a residual value approach to our analysis. Residual value is the value of the completed development (known as the Gross Development Value or GDV) less the costs of undertaking the development. The residual value is then available to pay for the land. The value of the scheme includes both the value of the market homes and affordable homes (and other non-residential values). Scheme costs include the costs of building the development, plus professional fees, scheme finance and a return to the developer. Scheme costs also include planning obligations (including affordable homes, direct s106 costs) and the greater the planning obligations, the less will be the residual value.
22. The residual value of a scheme is then compared with a benchmark land value. If the residual value is less than the benchmark value, then the scheme is less likely to be brought forward for development and is considered unviable for testing purposes. If the residual value exceeds the benchmark, then it can be considered viable in terms of policy testing.
23. PPG paragraph 012 - 015 sets out that benchmark land values should be based on the current use value of a site plus an appropriate site premium in most cases. The principle of this approach is that a landowner should receive at least the value of the land in its *'pre-permission'* use, which would normally be lost when bringing forward land for development. The benchmark land values used in this study are based on the principle of *'Existing Use Value Plus'* which is considered further in other parts of this report.
24. Note the approach to Local Plan level viability (or CIL) assessment does not require all sites in the plan to be viable. The Harman Report says that a site typologies approach (i.e. assessing a range of example development sites likely to come forward) to understanding plan viability is sensible, a view echoed in CIL guidance. Viability *'...is to provide high level assurance that the policies with the plan are set in a way that is compatible with the likely economic viability of development needed to deliver the plan'*.

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<sup>37</sup> Local Housing Delivery Group, 2012, Viability Testing Local Plans - Advice for planning practitioners

## Appendix B - Flats values from Land Registry/EPC

Date	HPI Adjusted Sale		Postcode	A3	Floorspace	£ per sqm
	Price					
11/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
08/01/2016	£219,029		EX1 1PD	SOUTHERNHAY EAST	47	£4,660
06/06/2019	£193,230		EX2 6FW	BURNTHOUSE LANE	62	£3,117
07/01/2016	£248,627		EX1 1PD	SOUTHERNHAY EAST	57	£4,362
08/01/2016	£219,029		EX1 1PD	SOUTHERNHAY EAST	47	£4,660
26/04/2019	£181,858		EX2 6FW	BURNTHOUSE LANE	62	£2,933
04/01/2016	£219,029		EX1 1PD	SOUTHERNHAY EAST	46	£4,761
08/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
08/01/2016	£342,158		EX1 1PD	SOUTHERNHAY EAST	78	£4,387
24/02/2017	£156,011		EX4 6AG	ACLAND ROAD	62	£2,516
02/04/2019	£188,260		EX2 6FW	BURNTHOUSE LANE	62	£3,036
12/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
23/12/2015	£242,354		EX1 1PD	SOUTHERNHAY EAST	50	£4,847
10/03/2017	£130,946		EX4 6AG	ACLAND ROAD	40	£3,274
18/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
22/11/2019	£167,582		EX4 1AJ	COWICK STREET	52	£3,223
04/01/2016	£236,788		EX1 1PD	SOUTHERNHAY EAST	51	£4,643
29/04/2019	£185,032		EX2 6FW	BURNTHOUSE LANE	62	£2,984
07/01/2016	£325,583		EX1 1PD	SOUTHERNHAY EAST	60	£5,426
08/01/2016	£313,744		EX1 1PD	SOUTHERNHAY EAST	60	£5,229
01/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
22/12/2015	£354,665		EX1 1PD	SOUTHERNHAY EAST	70	£5,067
01/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
04/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
08/01/2016	£248,627		EX1 1PD	SOUTHERNHAY EAST	50	£4,973
12/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
06/01/2016	£242,708		EX1 1PD	SOUTHERNHAY EAST	51	£4,759
11/03/2019	£179,688		EX2 6FW	BURNTHOUSE LANE	62	£2,898
07/01/2016	£349,262		EX1 1PD	SOUTHERNHAY EAST	60	£5,821
27/02/2019	£180,440		EX2 6FW	BURNTHOUSE LANE	62	£2,910
08/01/2016	£329,135		EX1 1PD	SOUTHERNHAY EAST	60	£5,486
12/03/2019	£179,688		EX2 6FW	BURNTHOUSE LANE	62	£2,898
08/01/2016	£378,861		EX1 1PD	SOUTHERNHAY EAST	70	£5,412
12/03/2019	£179,688		EX2 6FW	BURNTHOUSE LANE	62	£2,898
04/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
07/01/2016	£260,467		EX1 1PD	SOUTHERNHAY EAST	50	£5,209
05/03/2019	£178,684		EX2 6FW	BURNTHOUSE LANE	62	£2,882
07/01/2016	£248,627		EX1 1PD	SOUTHERNHAY EAST	51	£4,875
12/03/2019	£184,975		EX2 6FW	BURNTHOUSE LANE	62	£2,983
08/01/2016	£361,101		EX1 1PD	SOUTHERNHAY EAST	60	£6,018

28/03/2019	£184,975	EX2 6FW	BURNTHOUSE LANE	62	£2,983
08/01/2016	£361,101	EX1 1PD	SOUTHERNHAY EAST	60	£6,018
23/04/2019	£185,032	EX2 6FW	BURNTHOUSE LANE	62	£2,984
24/03/2016	£381,683	EX1 1PD	SOUTHERNHAY EAST	70	£5,453
28/03/2019	£181,803	EX2 6FW	BURNTHOUSE LANE	62	£2,932
24/03/2016	£456,863	EX1 1PD	SOUTHERNHAY EAST	92	£4,966
27/02/2019	£182,564	EX2 6FW	BURNTHOUSE LANE	62	£2,945
10/06/2016	£1,612,426	EX1 1PD	SOUTHERNHAY EAST	325	£4,961
12/03/2019	£179,688	EX2 6FW	BURNTHOUSE LANE	52	£3,456
12/03/2019	£184,975	EX2 6FW	BURNTHOUSE LANE	62	£2,983
04/03/2019	£184,975	EX2 6FW	BURNTHOUSE LANE	52	£3,557
23/08/2019	£186,252	EX2 6FW	BURNTHOUSE LANE	62	£3,004
23/08/2019	£186,252	EX2 6FW	BURNTHOUSE LANE	62	£3,004
28/08/2019	£183,059	EX2 6FW	BURNTHOUSE LANE	52	£3,520
23/08/2019	£183,059	EX2 6FW	BURNTHOUSE LANE	62	£2,953
23/08/2019	£186,252	EX2 6FW	BURNTHOUSE LANE	62	£3,004
23/08/2019	£186,252	EX2 6FW	BURNTHOUSE LANE	52	£3,582
26/09/2019	£182,456	EX2 6FW	BURNTHOUSE LANE	62	£2,943
26/09/2019	£182,456	EX2 6FW	BURNTHOUSE LANE	62	£2,943
26/09/2019	£179,327	EX2 6FW	BURNTHOUSE LANE	52	£3,449
26/09/2019	£179,327	EX2 6FW	BURNTHOUSE LANE	62	£2,892
26/09/2019	£161,650	EX2 6FW	BURNTHOUSE LANE	62	£2,607
26/09/2019	£161,650	EX2 6FW	BURNTHOUSE LANE	52	£3,109
26/09/2019	£182,456	EX2 6FW	BURNTHOUSE LANE	62	£2,943
26/09/2019	£182,456	EX2 6FW	BURNTHOUSE LANE	62	£2,943
26/09/2019	£179,327	EX2 6FW	BURNTHOUSE LANE	52	£3,449
26/09/2019	£179,327	EX2 6FW	BURNTHOUSE LANE	62	£2,892
26/09/2019	£161,650	EX2 6FW	BURNTHOUSE LANE	62	£2,607
27/08/2020	£193,328	EX4 1FB	OKEHAMPTON ROAD	60.00	£3,222
03/11/2015	£557,762	EX1 1AP	SOUTHERNHAY EAST	120	£4,648
31/03/2016	£404,815	EX4 3BG	BARTHOLOMEW STREET EAST	192	£2,108
24/07/2020	£196,261	EX4 1FB	OKEHAMPTON ROAD	56.00	£3,505
12/01/2016	£941,232	EX1 1AP	SOUTHERNHAY EAST	220	£4,278
31/03/2016	£375,900	EX4 3BG	BARTHOLOMEW STREET EAST	151	£2,489
20/03/2020	£208,601	EX4 1FB	OKEHAMPTON ROAD	67.00	£3,113
23/08/2019	£106,407	EX4 6LQ	OLD TIVERTON ROAD	29	£3,669
26/01/2016	£213,109	EX1 2FB	LADYSMITH LANE	61	£3,494
10/09/2020	£174,364	EX4 1FB	OKEHAMPTON ROAD	49.00	£3,558
15/04/2016	£198,930	EX1 2DL	CLIFTON HILL	76.11	£2,614
14/01/2019	£117,270	EX4 6LQ	OLD TIVERTON ROAD	34.49	£3,400
25/03/2020	£224,647	EX4 1FB	OKEHAMPTON ROAD	83.00	£2,707
25/09/2020	£187,045	EX4 1FB	OKEHAMPTON ROAD	58.00	£3,225
20/11/2015	£140,850	EX4 3DX	EXE STREET	42	£3,354
07/07/2020	£187,538	EX4 1FB	OKEHAMPTON ROAD	57.00	£3,290
22/03/2019	£422,868	EX2 6FN	EAST KINGFISHER LANE	118	£3,584

23/12/2016	£233,320	EX1 3FS	STADDLE STONE ROAD	75	£3,111
13/03/2019	£322,477	EX1 3RA	PILTON LANE	94	£3,431
22/12/2016	£216,573	EX1 3FS	STADDLE STONE ROAD	71	£3,050
28/11/2016	£188,594	EX1 3FX	ELSIE PLACE	52	£3,627
25/11/2016	£186,381	EX1 3FX	ELSIE PLACE	52	£3,584
25/11/2016	£183,047	EX1 3FX	ELSIE PLACE	52	£3,520
28/11/2016	£183,053	EX1 3FX	ELSIE PLACE	52	£3,520
25/11/2016	£179,719	EX1 3FX	ELSIE PLACE	52	£3,456
25/11/2016	£177,506	EX1 3FX	ELSIE PLACE	49	£3,623
23/12/2016	£178,605	EX1 3FS	STADDLE STONE ROAD	49	£3,645
28/11/2016	£188,594	EX1 3FX	ELSIE PLACE	52	£3,627
23/12/2016	£178,605	EX1 3FS	STADDLE STONE ROAD	49	£3,645
21/12/2016	£178,605	EX1 3FS	STADDLE STONE ROAD	49	£3,645
23/11/2018	£387,193	EX3 0FB	THE CHASE	106	£3,653
28/11/2016	£181,943	EX1 3FX	ELSIE PLACE	52	£3,499
23/12/2016	£178,605	EX1 3FS	STADDLE STONE ROAD	49	£3,645
07/12/2018	£265,504	EX3 0FB	THE CHASE	106	£2,505
28/11/2016	£186,375	EX1 3FX	ELSIE PLACE	52	£3,584
28/11/2016	£181,938	EX1 3FX	ELSIE PLACE	52	£3,499
11/12/2018	£265,504	EX3 0FB	THE CHASE	71	£3,739
08/03/2019	£315,869	EX3 0FB	THE CHASE	75	£4,212
28/11/2016	£183,047	EX1 3FX	ELSIE PLACE	52	£3,520
08/03/2019	£315,869	EX3 0FB	THE CHASE	75	£4,212
30/08/2019	£291,169	EX3 0FB	THE CHASE	75	£3,882
28/11/2016	£180,828	EX1 3FX	ELSIE PLACE	49	£3,690
10/10/2019	£293,740	EX3 0FB	THE CHASE	75	£3,917
23/08/2019	£294,895	EX3 0FB	THE CHASE	75	£3,932
16/08/2019	£294,895	EX3 0FB	THE CHASE	75	£3,932
27/04/2018	£380,427	EX3 0FB	THE CHASE	87	£4,373
08/02/2019	£191,058	EX4 8GB	COBLEY COURT	49	£3,899
21/09/2018	£203,471	EX4 8GB	COBLEY COURT	61	£3,336
27/04/2018	£418,469	EX3 0FB	THE CHASE	87	£4,810
21/09/2018	£201,332	EX4 8GB	COBLEY COURT	61	£3,301
18/09/2018	£203,471	EX4 8GB	COBLEY COURT	65	£3,130
27/01/2017	£180,737	EX1 3FS	STADDLE STONE ROAD	49	£3,689
24/08/2018	£453,720	EX3 0FB	THE CHASE	113	£4,015
14/02/2017	£184,913	EX1 3FS	STADDLE STONE ROAD	49	£3,774
21/09/2018	£187,767	EX4 8GB	COBLEY COURT	49	£3,832
21/09/2018	£206,549	EX4 8GB	COBLEY COURT	61	£3,386
22/06/2018	£243,733	EX3 0FB	THE CHASE	54	£4,514
20/09/2018	£208,636	EX4 8GB	COBLEY COURT	61	£3,420
14/06/2019	£245,700	EX3 0FB	THE CHASE	54	£4,550
23/02/2017	£184,913	EX1 3FS	STADDLE STONE ROAD	49	£3,774
14/09/2018	£208,636	EX4 8GB	COBLEY COURT	65	£3,210
26/09/2018	£181,507	EX4 8GB	COBLEY COURT	49	£3,704

21/09/2018	£203,471	EX4 8GB	COBLEY COURT	61	£3,336
14/09/2018	£203,471	EX4 8GB	COBLEY COURT	61	£3,336
20/09/2018	£208,636	EX4 8GB	COBLEY COURT	65	£3,210
28/06/2018	£205,814	EX1 3WX	MYRTLEBURY WAY	52	£3,958
27/06/2018	£194,981	EX1 3WX	MYRTLEBURY WAY	49	£3,979
26/06/2018	£203,647	EX1 3WX	MYRTLEBURY WAY	52	£3,916
28/06/2018	£209,064	EX1 3WX	MYRTLEBURY WAY	52	£4,020
27/06/2018	£210,147	EX1 3WX	MYRTLEBURY WAY	52	£4,041
23/08/2019	£170,337	EX4 1AJ	COWICK STREET	52	£3,276
26/07/2019	£175,017	EX4 1AJ	COWICK STREET	51	£3,432

# Appendix C - Property for sale

24/03/2022, 14:27 Properties For Sale in Exeter | Rightmove

Exeter + 0 miles Min Price to Max Price Filters (1)

New Homes and Developments For Sale in Exeter, Devon, flat > ☆ Save search 🔔 Create Alert

8 results Sort: Lowest Price

Prioritise properties with... + Add keyword

**1/5** FEATURED NEW HOME



**St Leonards, Exeter**  
Apartment | 2 | 2

STYLISH FIRST FLOOR CITY CENTRE APARTMENT in this exclusive contemporary design development of just 9 HIGH SPECIFICATION apartments on the fringes of St Leonards, just yards from the City Centre. Offering a GREAT OPEN-PLAN LIVING SPACE with fantastic SOUTH FACING BALCONY, two bedrooms, en suite a...

**£530,000**  
Guide Price

**NEW HOME**

Added on 17/03/2022 by Wilkinson Grant & Co, New Homes

Price Change History  
17/03/2022 Initial entry found: £530,000

Wilkinson Grant & Co 01392 799041 Local call rate Contact Save

**1/13**

**Spicer Road, Exeter, EX1**  
Apartment | 2 | 2

https://www.rightmove.co.uk/property-for-sale/find.html?locationIdentifier=REGION%5E494&sortType=1&propertyTypes=flat&primaryDisplayPropertyType=flats&includeSSTC=false&mustHave=newHome&dontShow... 1/8

24/03/2022, 14:27 Properties For Sale in Exeter | Rightmove

Exeter + 0 miles Min Price to Max Price Filters (1)



**£449,000** NO CHAIN

**NEW HOME**

Reduced on 13/07/2021 by Jackson-Stops, Exeter Developments

Price Change History  
13/07/2021 Price changed from £485,000 to £449,000  
28/06/2021 Initial entry found: £485,000

JACKSON-STOPS 01392 799178 Local call rate Contact Save



**Spicer Road, Exeter, EX1**  
Apartment | 2 | 2

A striking 2 bedroom, 2nd floor apartment with en-suite to master bedroom, home office and Juliette balcony. Allocated parking space pre-wired for electric vehicle connection and a 10 year premier warranty. \*\*\*ANTICIPATED FOR COMPLETION FROM AUGUST 2021\*\* Situated...

**£449,000**

**NEW HOME**

Reduced on 13/07/2021 by Jackson-Stops, Exeter Developments

01392 799178

https://www.rightmove.co.uk/property-for-sale/find.html?locationIdentifier=REGION%5E494&sortType=1&propertyTypes=flat&primaryDisplayPropertyType=flats&includeSSTC=false&mustHave=newHome&dontShow... 2/8

1/5

St Leonards, Exeter ✕

Apartment | 2 | 2

\*\*\*\*WITH PARKING AND BALCONY\*\*\*\* STUNNING SPACIOUS first floor CITY CENTRE APARTMENT in this CONTEMPORARY-DESIGN exclusive new development on the fringes of St Leonards, just yards from the vibrant Princesshay Quarter and Cathedral. Boasting FABULOUS STYLISH OPEN-PLAN LIVING ROOM KITCH...

£495,000 OFF-STREET PARKING  
Guide Price

NEW HOME

Added on 22/12/2021 by Wilkinson Grant & Co, New Homes

WG Wilkinson Grant & Co

01392 799041  
Local call rate

✉ **Contact**

♡ **Save**

Price Change History  

22/12/2021	Initial entry found: £495,000
------------	-------------------------------

<https://www.rightmove.co.uk/property-for-sale/find.html?locationIdentifier=REGION%5E494&sortType=1&propertyTypes=flat&primaryDisplayPropertyType=flats&includeSSTC=false&mustHave=newHome&dontShow...> 3/8

24/03/2022, 14:27

Properties For Sale in Exeter | Rightmove

Exeter
+ 0 miles
Min Price to Max Price
Filters (1)

1/15

**Newberry Lodge, 147 Magdalen Road, Exeter, EX2**  
Flat | 2

A stunning 2 bedroom apartment with a private garden and parking. The apartment has its own private entrance Originally the Biology and Physics Department, your spacious two-bedroom apartment is situated on the ground and first floor, with a private entrance to the west of the building. The apa...

£500,000  
Guide Price

NEW HOME

Added on 18/03/2021 by Knight Frank, Exeter

Knight Frank

01392 799083  
Local call rate

✉ **Contact**

♡ **Save**

Price Change History  

11/11/2021	Initial entry found: £500,000
------------	-------------------------------

1/5

**St Leonards, Exeter** ✕  
Apartment | 2 | 2

STYLISH FIRST FLOOR CITY CENTRE APARTMENT in this exclusive contemporary design development of just 9 HIGH SPECIFICATION apartments on the fringes of St Leonards, just yards from the City Centre. Offering a GREAT OPEN-PLAN LIVING SPACE with fantastic SOUTH FACING BALCONY, two bedrooms, en suite a...

£530,000  
Guide Price

NEW HOME

Added on 17/03/2022 by Wilkinson Grant & Co, New Homes

WG Wilkinson Grant & Co

01392 799041  
Local call rate

✉ **Contact**

♡ **Save**

Price Change History  

17/03/2022	Initial entry found: £530,000
------------	-------------------------------

<https://www.rightmove.co.uk/property-for-sale/find.html?locationIdentifier=REGION%5E494&sortType=1&propertyTypes=flat&primaryDisplayPropertyType=flats&includeSSTC=false&mustHave=newHome&dontShow...> 4/8

24/03/2022, 14:27

Properties For Sale in Exeter | Rightmove

Exeter + 0 miles Min Price to Max Price Filters (1)

**Apartment** | 2 | 2

\*\*\*WITH STUNNING ROOF TERRACE AND PARKING\*\*\* ONE OF THE BEST VIEWS IN THE CITY overlooking the RIVER EXE, Exeter's historic quayside and Cathedral. SPECTACULAR, RESTORED GRADE II LISTED PENTHOUSE apartment with ROOFTOP TERRACE. Offering two large Bedrooms, luxurious Bathroom, STY...

**£750,000**  
From

[Price Change History](#)  
20/03/2022 Initial entry found: £750,000

**NEW HOME**  
Added on 20/03/2022 by Wilkinson Grant & Co, New Homes

**WG Wilkinson Grant & Co** 01392 799041 Local call rate [Contact](#) [Save](#)

**St Leonards, Exeter** 1/6 ×

**Apartment** | 2 | 2

\*\*PENTHOUSE APARTMENT WITH DOUBLE GARAGE\*\* AN INCREDIBLY IMPRESSIVE PENTHOUSE apartment in this prestigious building in the popular area of St Leonards. Served by an elevator this apartment occupies the whole top floor. STUNNING OPEN PLAN living/dining/kitchen, two bedrooms, each with ...

**POA** **GARAGE**

[Price Change History](#)  
02/02/2022 Initial entry found: POA

**NEW HOME**  
Added on 22/12/2021 by Wilkinson Grant & Co, New Homes

**WG Wilkinson Grant & Co** 01392 799041 Local call rate [Contact](#) [Save](#)

<https://www.rightmove.co.uk/property-for-sale/find.html?locationIdentifier=REGION%5E494&sortType=1&propertyTypes=flat&primaryDisplayPropertyType=flats&includeSTC=false&mustHave=newHome&dontShow...> 5/8

24/03/2022, 14:27

Properties For Sale in Exeter | Rightmove

Exeter + 0 miles Min Price to Max Price Filters (1)

**Exeter** 1/13 ×

**Apartment** | 3 | 3

\*\*\*WITH GARAGE AND GARDEN\*\*\* FABULOUS LUXURY DUPLEX APARTMENT forming first and second floors of a MAGNIFICENT RESTORED GRADE II LISTED GEORGIAN TERRACE overlooking the RIVER EXE and Exeter's historic quayside. Offering three good bedrooms, three luxurious bathrooms, IMPRESSIVE 2...

**£1,250,000** **STUNNING VIEWS**

[Price Change History](#)  
07/02/2022 Initial entry found: £1,250,000

**NEW HOME**  
Added on 07/02/2022 by Wilkinson Grant & Co, New Homes

**01392 799041** Local call rate [Contact](#) [Save](#)

# Appendix D - BCIS



## £/m<sup>2</sup> study

Description: Rate per m<sup>2</sup> gross internal floor area for the building Cost including prelims.

Last updated: 15-Jan-2022 00:38

↳ Rebased to 4Q 2021 (344) and Exeter ( 99; sample 38 )

Maximum age of results: 5 years

Building function (Maximum age of projects)	£/m <sup>2</sup> gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
<b>New build</b>							
810. Housing, mixed developments (5)	1,268	720	1,129	1,247	1,367	2,785	384
<b>810.1 Estate housing</b>							
Generally (5)	1,264	709	1,075	1,203	1,371	4,552	216
Single storey (5)	1,460	869	1,114	1,368	1,591	4,552	46
2-storey (5)	1,201	709	1,056	1,179	1,313	1,934	166
3-storey (5)	1,231	-	-	-	-	-	1
4-storey or above (5)	2,208	-	-	-	-	-	1
810.11 Estate housing detached (5)	2,491	1,069	-	2,170	-	4,552	4
<b>810.12 Estate housing semi detached</b>							
Generally (5)	1,248	777	1,089	1,239	1,350	2,268	52
Single storey (5)	1,338	1,017	1,090	1,274	1,490	2,268	21
2-storey (5)	1,187	777	1,093	1,184	1,296	1,934	31
<b>810.13 Estate housing terraced</b>							
Generally (5)	1,283	852	1,071	1,188	1,412	1,881	15
2-storey (5)	1,240	852	1,065	1,183	1,366	1,767	14
<b>816. Flats (apartments)</b>							
Generally (5)	1,452	823	1,200	1,357	1,633	3,231	202
1-2 storey (5)	1,401	909	1,166	1,315	1,479	2,083	45
3-5 storey (5)	1,446	823	1,204	1,348	1,619	3,231	130
6 storey or above (5)	1,565	1,134	1,340	1,574	1,710	2,285	27
856.2 Students' residences, halls of residence, etc (5)	1,838	1,126	1,414	1,950	2,167	2,471	16

## Appendix E - Summary results and appraisals

Typology	Dwgs	%AH	CIL liable floor area	Market GDV	First Homes GDV	AH GDV (Exc FH)	Dev rtn - 17.5% Mkt GDV	Dev rtn - 10% FH GDV	Cont Rtn - 6% AH GDV	Scheme gross RV	Scheme RV post returns	Additional headroom £/sqm (CIL liable)
Res1	15	35%	849.3	£2,340,000	£200,813	£319,988	£409,500	£20,081	£19,199	£486,251	<b>£37,470</b>	£44
Res2	15	35%	849.3	£2,340,000	£200,813	£319,988	£409,500	£20,081	£19,199	£449,292	<b>£511</b>	£1
Res3	75	35%	4,246.3	£11,700,000	£1,004,063	£1,599,938	£2,047,500	£100,406	£95,996	£2,611,884	<b>£367,981</b>	£87
Res4	150	35%	8,492.6	£23,400,000	£2,008,125	£3,199,875	£4,095,000	£200,813	£191,993	£3,985,763	<b>-£502,042</b>	<b>-£59</b>
Res5	350	35%	19,816.1	£54,600,000	£4,685,625	£7,466,375	£9,555,000	£468,563	£447,983	£10,071,370	<b>-£400,175</b>	<b>-£20</b>
Typology	Dwgs	%AH	CIL liable floor area	Market GDV		Discount Rent GDV	Dev rtn - 10% Mkt GDV		Cont Rtn - 10% AH GDV	Scheme Gross RV	Scheme Net RV post land & returns	Additional headroom £/sqm (CIL liable)
BtR1	150	20%	9,678.0	£26,640,000	£0	£5,340,000	£2,664,000		£534,000	£6,227,596	<b>£3,029,596</b>	£313
BtR2	350	20%	22,582.0	£62,160,000	£0	£12,460,000	£6,216,000		£1,246,000	£15,565,563	<b>£8,103,563</b>	£359
BtR3	350	20%	23,940.0	£62,160,000	£0	£12,460,000	£6,216,000		£1,246,000	£8,737,099	<b>£1,275,099</b>	£53

Summary Results							
Site Details	Enter - CIL testing March 2022		Site Address	Plot 1, 15 Rats, Greenfield		Site Reference	GP land value 2
Schema Description			Notes			Application No	
						Date Saved	16/03/2022

Site Details			Dwellings			GIA (sq m)	
Gross Area	0.10	ha	Total	15.00		1,110.0	
Net Area	0.10	ha	Market Housing	11.00		849.3	
Net to Gross Ratio	100.0%		Affordable Housing	3.94		260.7	
Density	150.00	dwgs per net ha	% Affordable Housing	26.25%			

	Affordable Housing						
	Total	Market	Social Rent	Affordable Rent	Intermediate Rent	Equity Share	Shared Ownership
Total No of Dwellings	15.00	11.00	-	-	-	3.00	0.20
Total GIA (sq m)	1,110.0	849.3	-	-	-	342.2	18.5
Tenure Split (by % dwellings)		73.8%	0.0%	0.0%	0.0%	24.5%	1.8%
Total Revenue	2,868,800	2,648,813	-	-	-	279,330	40,698
Average Revenue per unit	190,720	229,678	-	-	-	76,000	155,000
Average Revenue per sq m GIA	2,577	2,992	-	-	-	1,193	2,195

Scheme Revenue	
Total Capital Contributions	-
Total Commercial Elements	-
<b>Total Scheme Revenue</b>	<b>2,868,800</b>

	Affordable Housing							Per dwelling	per sq m
	Total	Market	Social Rent	Affordable Rent	Intermediate Rent	Equity Share	Shared Ownership		
Build Cost (inc external works)	1,768,530	1,388,837	-	-	-	285,216	29,476	117,702	1,597
Additional Dwelling Standards	-	-	-	-	-	-	-	-	-
Professional Fees	141,242	108,087	-	-	-	33,817	2,358	9,416	127
Marketing Costs (market housing)	78,224	78,224	-	-	-	-	-	6,899	95
Marketing Costs (aff housing)	-	-	-	-	-	-	-	-	-
Land & Development Costs	208,079	151,246	-	-	-	50,244	3,599	13,672	188
Planning Obligations Costs	54,420	-	-	-	-	-	-	2,629	49
Commercial Elements Costs	-	-	-	-	-	-	-	-	-
Community Infrastructure Levy	-	-	-	-	-	-	-	-	-
<b>Total Development Costs</b>	<b>2,242,496</b>							149,500	2,095
<b>Total Operating Profit</b>	<b>616,304</b>							41,295	567

Finance Costs and Residual Value	
Period	2 years
Detail Interest Rate	6.8%
Credit Interest Rate	0.8%
Annual Discount Rate	0.8%
Revenue and Capital Contributions	2,868,800
Total Development Cost	2,242,496
Finance Cost	132,053
Annual Discount Rate Cost	-
Total Dev Cost, Finance Cost & ADR Cost	2,374,549
<b>Gross Residual Value</b>	<b>494,251</b>

Notes: (use Alt-Enter to start a new line)

0.0% Build costs
3.0% market revenue
0.0% affordable revenue
0.0% CIL as %Revenue
£0.00 per market sq m
0.0% CIL as %Dev Costs

Summary Results																																																																																																																																						
Site Details	Exeter - CR, listing March 2022			Site Address	Plas2, 15 Bats, Brownfield		Site Reference	BF land value 2																																																																																																																														
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Total No of Dwellings	75.00	55.31	-	-	-	19.69	1.31																																																																																																																											
Total GIA (sq m)	5,549.9	4,246.3	-	-	-	1,210.9	92.7																																																																																																																											
Tenure Split (by % dwellings)		73.8%	0.0%	0.0%	0.0%	24.5%	1.8%																																																																																																																											
Total Revenue	14,304,000	12,704,063	-	-	-	1,388,930	293,436																																																																																																																											
Average Revenue per unit	190,720	229,678	-	-	-	70,093	155,093																																																																																																																											
Average Revenue per sq m GIA	2,577	2,992	-	-	-	1,153	2,195																																																																																																																											
Total Capital Contributions	-																																																																																																																																	
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Summary Results																																					
Site Details	Enter - CIL, listing March 2022		Site Address	Plot4, 150 Rats, Brevenfield		Site Reference	DF land value 2																														
Scheme Description			Notes			Application No																															
						Date Saved	16/03/2022																														
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	Total	Market	Social Rent	Affordable Rent	Intermediate Rent	Equity Share	Shared Ownership																														
Total No of Dwellings	190.00	110.63	-	-	-	30.70	2.63																														
Total GIA (sq m)	11,999.8	8,492.6	-	-	-	2,421.8	185.3																														
Tenure Split (by % dwellings)		73.8%	0.0%	0.0%	0.0%	24.5%	1.8%																														
Total Revenue	26,608,000	26,408,125	-	-	-	2,793,000	436,870																														
Average Revenue per unit	190,720	226,678	-	-	-	78,090	155,090																														
Average Revenue per sq m GIA	2,577	2,982	-	-	-	3,153	2,185																														
Total Capital Contributions	-																																				
Total Commercial Elements	-																																				
Total Scheme Revenue	26,608,000																																				
<b>Scheme Development Costs</b>																																					
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	Total	Market	Social Rent	Affordable Rent	Intermediate Rent	Equity Share	Shared Ownership																														
Build Cost (inc external works)	17,625,262	13,508,389	-	-	-	3,852,150	294,778	Per dwelling 117,702 per sq m 1,587																													
Additional Dwelling Standards	-	-	-	-	-	-	-	-																													
Professional Fees	1,412,424	1,089,870	-	-	-	308,172	23,582	9,418 127 8.0% build costs																													
Marketing Costs (market housing)	762,244	762,244	-	-	-	-	-	6,895 90 3.0% market revenue																													
Marketing Costs (aff housing)	-	-	-	-	-	-	-	-																													
Land & Development Costs	2,533,081	1,888,147	-	-	-	620,805	44,329	16,087 228 0.0% affordable revenue																													
Planning Obligations Costs	1,116,000	-	-	-	-	-	-	7,409 100																													
Commercial Elements Costs	-	-	-	-	-	-	-	-																													
Community Infrastructure Levy	-	-	-	-	-	-	-	-																													
Total Development Costs	23,473,651	15,148,650	-	-	-	4,481,132	362,739	126,497 2,115 0.0% CL as %Revenue 20.00 per market sq m 0.0% CL as %Dev Costs																													
Total Operating Profit	5,134,849																																				
<b>Finance Costs and Residual Value</b>																																					
Period	5 years																																				
Debit Interest Rate	8.2%																																				
Credit Interest Rate	0.2%																																				
Annual Discount Rate	0.2%																																				
Revenue and Capital Contributions	26,608,000																																				
Total Development Cost	23,473,651																																				
Finance Cost	1,146,188																																				
Annual Discount Rate Cost	-																																				
Total Dev Cost, Finance Cost & ADR Cost	24,622,237																																				
Gross Residual Value	3,965,763																																				
Notes: (use Alt+Enter to start a new line)																																					

Summary Results													
<b>Site Details</b>	Enter - CIL, listing March 2022			<b>Site Address</b>	Plot 5, 350 flats, Brevenfield			<b>Site Reference</b>	SF land value 2				
<b>Scheme Description</b>				<b>Notes</b>				<b>Application No</b>					
								<b>Date Saved</b>	16/03/2022				
<b>Site Details</b>				<b>Dwellings</b>		<b>GIA (sq m)</b>							
Gross Area	1.17 ha			Total	390.00		26,869.6						
Net Area	1.17 ha			Market Housing	258.13		19,816.1						
Net to Gross Ratio	100.0%			Affordable Housing	91.88		6,053.4						
Density	299.91 dwgs per net ha			% Affordable Housing	23.55%								
<b>Scheme Revenue</b>													
	<b>Total</b>		<b>Affordable Housing</b>										
		<b>Market</b>	<b>Social Rent</b>	<b>Affordable Rent</b>	<b>Intermediate Rent</b>	<b>Equity Share</b>	<b>Shared Ownership</b>						
<b>Total No of Dwellings</b>	293.00	258.13	-	-	-	95.76	6.13						
<b>Total GIA (sq m)</b>	25,899.6	19,816.1	-	-	-	5,850.9	432.4						
<b>Tenure Split (by % dwellings)</b>		73.8%	0.0%	0.0%	0.0%	24.5%	1.8%						
<b>Total Revenue</b>	66,752,000	56,285,625	-	-	-	6,617,800	948,375						
<b>Average Revenue per unit</b>	227,464	226,678	-	-	-	78,000	155,000						
<b>Average Revenue per sq m GIA</b>	2,577	2,982	-	-	-	1,153	2,195						
<b>Total Capital Contributions</b>	-												
<b>Total Commercial Elements</b>	-												
<b>Total Scheme Revenue</b>	66,752,000												
<b>Scheme Development Costs</b>													
	<b>Total</b>		<b>Affordable Housing</b>							<b>Per dwelling</b>		<b>per sq m</b>	
		<b>Market</b>	<b>Social Rent</b>	<b>Affordable Rent</b>	<b>Intermediate Rent</b>	<b>Equity Share</b>	<b>Shared Ownership</b>						
<b>Build Cost (inc external works)</b>	41,195,785	31,519,528	-	-	-	8,988,381	887,815	117,702	1,581	8.0% build cost			
<b>Additional Dwelling Standards</b>	-	-	-	-	-	-	-	-	-	3.0% market revenue			
<b>Professional Fees</b>	3,295,656	2,521,562	-	-	-	719,099	55,825	9,416	127	0.0% affordable revenue			
<b>Marketing Costs (market housing)</b>	1,778,549	1,778,549	-	-	-	-	-	6,695	99				
<b>Marketing Costs (aff housing)</b>	-	-	-	-	-	-	-	-	-				
<b>Land &amp; Development Costs</b>	5,924,287	4,369,197	-	-	-	1,451,449	153,875	16,927	229				
<b>Planning Obligations Costs</b>	2,596,000	-	-	-	-	-	-	7,406	106				
<b>Commercial Elements Costs</b>	-	-	-	-	-	-	-	-	-				
<b>Community Infrastructure Levy</b>	-	-	-	-	-	-	-	-	-	0.0% CIL as %Revenue			
<b>Total Development Costs</b>	54,784,219	49,389,236	-	-	-	10,158,929	1,097,515	156,526	2,115	20.00 per market sq m			
<b>Total Operating Profit</b>	11,967,789	6,896,389	-	-	-	3,458,871	850,860	34,194	462	0.0% CIL as %Dev Costs			
<b>Finance Costs and Residual Value</b>													
<b>Period</b>	10 years												
<b>Debit Interest Rate</b>	8.0%												
<b>Credit Interest Rate</b>	0.0%												
<b>Annual Discount Rate</b>	0.0%												
<b>Revenue and Capital Contributions</b>	66,752,000												
<b>Total Development Cost</b>	54,784,219												
<b>Finance Cost</b>	1,886,430												
<b>Annual Discount Rate Cost</b>	-												
<b>Total Dev Cost, Finance Cost &amp; ADR Cost</b>	56,668,630												
<b>Gross Residual Value</b>	16,071,379												
<b>Notes:</b> (use Alt+Enter to start a new line)													

Summary Results																																																																																																																																						
Site Details	Estate - CIL Issued March 2022			Site Address	B911, 150 Rata, Brownfield			Site Reference	BF land value 2																																																																																																																													
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<b>Non-residential viability assessment model</b>						
<b>Student accommodation with a mix of studios and cluster flat rooms</b>						
	Size of unit (GIA)	1,280	sq m			
	Ratio of GEA to GIA	100.0%				User input cells
	GEA	1280	sq m			Produced by model
	NIA as % of GIA	95%				Key results
	NIA	1216	sq m		GEA	Gross external area
	Rooms	40			GIA	Gross internal area
	Floors	3			NIA	Net internal area
	Site area	0.05	Hectares			
<b>SCHEME REVENUE</b>						
	Capital value per room	£ 121,700			£ 4,868,000	
	Less purchaser costs	6.80	% of yield x rent			
	Gross Development Value					£ 4,558,052
<b>SITE BENCHMARK</b>						
	Benchmark per ha	£1,200,000				
	Site benchmark				£56,889	
	SDLT				£0	
	Agents and legal	1.75%			£996	
	Total site costs					£ 57,884
<b>SCHEME COSTS</b>						
	Build costs	£ 1,838	per sq m		£ 2,352,640	
	Building standards	2.50%	of base build costs		£ 58,816	
	External costs	10%	of base build costs		£ 235,264	
	<b>Total construction costs</b>					£ 2,646,720
	Professional fees	8.00%	of construction costs		£ 211,738	
	Sales and lettings costs	3%	of GDV		£ 136,742	
	Planning obligations				£ 8,000	
	Other policy costs				£ 876	
	<b>Total 'other costs'</b>					£ 357,355
	Finance costs	6.0%	Interest rate			
	Build period	12	Months			
	Finance costs for 100% of construction and other costs				£ 183,718	
	Void finance period (in months)	0	Months		£ -	
	<b>Total finance costs</b>					£ 183,718
	Developer return	10.0%	Scheme value			£ 455,805
	<b>Total scheme costs</b>					£ 3,701,482
<b>RESIDUAL VALUE</b>						
	Residual value		For the scheme			£ 856,570
			Equivalent per hectare			£ 18,068,282
						Go to next stage
<b>Potential for CIL</b>						
	Total potential scheme headroom				£ 856,570	
	Headroom per sq m				£ 669	

<b>Non-residential viability assessment model</b>						
<b>Student accomodation with a mix of studios and cluster flat rooms</b>						
	Size of unit (GIA)	3,200	sq m			
	Ratio of GEA to GIA	100.0%				User input cells
	GEA	3200	sq m			Produced by model
	NIA as % of GIA	95%				Key results
	NIA	3040	sq m		GEA	Gross external area
	Rooms	100			GIA	Gross internal area
	Floors	5			NIA	Net internal area
	Site area	0.09	Hectares			
<b>SCHEME REVENUE</b>						
	Capital value per room	£ 121,700			£ 12,170,000	
	Less purchaser costs	6.80	% of yield x rent			
	Gross Development Value					<b>£ 11,395,131</b>
<b>SITE BENCHMARK</b>						
	Benchmark per ha	£1,200,000				
	Site benchmark				£102,400	
	SDLT				£0	
	Agents and legal	1.75%			£1,792	
	Total site costs					<b>£ 104,192</b>
<b>SCHEME COSTS</b>						
	Build costs	£ 1,838	per sq m		£ 5,881,600	
	Building standards	2.50%	of base build costs		£ 147,040	
	External costs	10%	of base build costs		£ 588,160	
	<b>Total construction costs</b>					<b>£ 6,616,800</b>
	Professional fees	8.00%	of construction costs		£ 529,344	
	Sales and lettings costs	3%	of GDV		£ 341,854	
	Planning obligations				£ 20,000	
	Other policy costs				£ 82,470	
	<b>Total 'other costs'</b>					<b>£ 973,668</b>
	Finance costs	6.0%	Interest rate			
	Build period	18	Months			
	Finance costs for 100% of construction and other costs				£ 692,519	
	Void finance period (in months)	0	Months		£ -	
	<b>Total finance costs</b>					<b>£ 692,519</b>
	Developer return	10.0%	Scheme value			
	<b>Total scheme costs</b>					<b>£ 9,526,693</b>
<b>RESIDUAL VALUE</b>						
	Residual value		For the scheme			<b>£ 1,868,439</b>
			Equivalent per hectare			<b>£ 21,895,764</b>
						<b>Go to next stage</b>
<b>Potential for CIL</b>						
	Total potential scheme headroom				£ 1,868,439	
	Headroom per sq m				£ 584	

<b>Non-residential viability assessment model</b>						
<b>Student accommodation with a mix of studios and cluster flat rooms</b>						
	Size of unit (GIA)	8,000	sq m			
	Ratio of GEA to GIA	100.0%				User input cells
	GEA	8000	sq m			Produced by model
	NIA as % of GIA	95%				Key results
	NIA	7600	sq m		GEA	Gross external area
	Rooms	250			GIA	Gross internal area
	Floors	6			NIA	Net internal area
	Site area	0.27	Hectares			
<b>SCHEME REVENUE</b>						
	Capital value per room	£ 121,700			£ 30,425,000	
	Less purchaser costs	6.80	% of yield x rent			
	Gross Development Value					<b>£ 28,487,828</b>
<b>SITE BENCHMARK</b>						
	Benchmark per ha	£1,200,000				
	Site benchmark				£320,000	
	SDLT				£5,500	
	Agents and legal	1.75%			£5,600	
	Total site costs					<b>£ 331,100</b>
<b>SCHEME COSTS</b>						
	Build costs	£ 1,838	per sq m		£ 14,704,000	
	Building standards	2.50%	of base build costs		£ 367,600	
	External costs	10%	of base build costs		£ 1,470,400	
	<b>Total construction costs</b>					<b>£ 16,542,000</b>
	Professional fees	8.00%	of construction costs		£ 1,323,360	
	Sales and lettings costs	3%	of GDV		£ 854,635	
	Planning obligations				£ 50,000	
	Other policy costs				£ 164,925	
	<b>Total 'other costs'</b>					<b>£ 2,392,920</b>
	Finance costs	6.0%	Interest rate			
	Build period	24	Months			
	Finance costs for 100% of construction and other costs				£ 2,311,922	
	Void finance period (in months)	0	Months		£ -	
	<b>Total finance costs</b>					<b>£ 2,311,922</b>
	Developer return	10.0%	Scheme value			
	<b>Total scheme costs</b>					<b>£ 2,848,783</b>
						<b>£ 24,426,725</b>
<b>RESIDUAL VALUE</b>						
	Residual value		For the scheme			<b>£ 4,061,102</b>
			Equivalent per hectare			<b>£ 15,229,134</b>
						<b>Go to next stage</b>
<b>Potential for CIL</b>						
	Total potential scheme headroom				£ 4,061,102	
	Headroom per sq m				£ 508	

<b>Non-residential viability assessment model</b>						
<b>Co-living with a mix of studios and cluster flat rooms</b>						
	Size of unit (GIA)	1,400	sq m			
	Ratio of GEA to GIA	100.0%				User input cells
	GEA	1400	sq m			Produced by model
	NIA as % of GIA	95%				Key results
	NIA	1,330	sq m		GEA	Gross external area
	Rooms	40			GIA	Gross internal area
	Floors	5			NIA	Net internal area
	Site area	0.08	Hectares			
<b>SCHEME REVENUE</b>						
	Capital value per market room	£ 145,000			£ 4,640,000	
	Capital value per discount market room	£ 103,000			£ 824,000	
	Less purchaser costs	6.80	% of yield x rent			
	Gross Development Value					<b>£ 5,116,105</b>
<b>SITE BENCHMARK</b>						
	Benchmark per ha	£1,200,000				
	Site benchmark				£96,000	
	SDLT				£0	
	Agents and legal	1.75%			£1,680	
	Total site costs					<b>£ 97,680</b>
<b>SCHEME COSTS</b>						
	Build costs	£ 1,996	per sq m		£ 2,793,760	
	Building standards	2.50%	of base build costs		£ 69,844	
	External costs	10%	of base build costs		£ 279,376	
	<b>Total construction costs</b>					<b>£ 3,142,980</b>
	Professional fees	8.00%	of construction costs		£ 251,438	
	Sales and lettings costs	3%	of GDV		£ 153,483	
	Planning obligations				£ 64,000	
	Other policy costs				£ 30,343	
	<b>Total 'other costs'</b>					<b>£ 499,264</b>
	Finance costs	6.0%	Interest rate			
	Build period	12	Months			
	Finance costs for 100% of construction and other costs				£ 224,395	
	<b>Total finance costs</b>					<b>£ 224,395</b>
	Developer return	15.0%	Scheme value			
	<b>Total scheme costs</b>					<b>£ 767,416</b>
						<b>£ 4,731,735</b>
<b>RESIDUAL VALUE</b>						
	Residual value		For the scheme			<b>£ 384,370</b>
			Equivalent per hectare			<b>£ 4,804,619</b>
						<b>Go to next stage</b>
<b>Potential for CIL</b>						
	Total potential scheme headroom				£ 384,370	
	Headroom per sq m				£ 343	

Non-residential viability assessment model						
Co-living with a mix of studios and cluster flat rooms						
	Size of unit (GIA)	3,500	sq m			
	Ratio of GEA to GIA	100.0%				User input cells
	GEA	3500	sq m			Produced by model
	NIA as % of GIA	95%				Key results
	NIA	3,325	sq m		GEA	Gross external area
	Rooms	100			GIA	Gross internal area
	Floors	5			NIA	Net internal area
	Site area	0.20	Hectares			
<b>SCHEME REVENUE</b>						
	Capital value per market room	£ 145,000			£ 11,600,000	
	Capital value per discount market room	£ 103,000			£ 2,060,000	
	Less purchaser costs	6.80	% of yield x rent			
	Gross Development Value					£ 12,790,262
<b>SITE BENCHMARK</b>						
	Benchmark per ha	£1,200,000				
	Site benchmark				£240,000	
	SDLT				£1,800	
	Agents and legal	1.75%			£4,200	
	Total site costs					£ 246,000
<b>SCHEME COSTS</b>						
	Build costs	£ 1,996	per sq m		£ 6,984,400	
	Building standards	2.50%	of base build costs		£ 174,610	
	External costs	10%	of base build costs		£ 698,440	
	<b>Total construction costs</b>					£ 7,857,450
	Professional fees	8.00%	of construction costs		£ 628,596	
	Sales and lettings costs	3%	of GDV		£ 383,708	
	Planning obligations				£ 160,000	
	Other policy costs				£ 75,424	
	<b>Total 'other costs'</b>					£ 1,247,728
	Finance costs	6.0%	Interest rate			
	Build period	18	Months			
	Finance costs for 100% of construction and other costs				£ 841,606	
	<b>Total finance costs</b>					£ 841,606
	Developer return	15.0%	Scheme value			£ 1,918,539
	<b>Total scheme costs</b>					£ 12,111,323
<b>RESIDUAL VALUE</b>						
	Residual value		For the scheme			£ 678,939
			Equivalent per hectare			£ 3,394,695
						Go to next stage
<b>Potential for CIL</b>						
	Total potential scheme headroom				£	678,939
	Headroom per sq m				£	242

<b>Non-residential viability assessment model</b>						
<b>Co-living with a mix of studios and cluster flat rooms</b>						
	Size of unit (GIA)	8,750	sq m			
	Ratio of GEA to GIA	100.0%				User input cells
	GEA	8750	sq m			Produced by model
	NIA as % of GIA	95%				Key results
	NIA	8,313	sq m	GEA		Gross external area
	Rooms	250		GIA		Gross internal area
	Floors	5		NIA		Net internal area
	Site area	0.50	Hectares			
<b>SCHEME REVENUE</b>						
	Capital value per market room	£ 145,000			£ 29,000,000	
	Capital value per discount market room	£ 103,000			£ 5,150,000	
	Less purchaser costs	6.80	% of yield x rent			
	Gross Development Value					<b>£ 31,975,655</b>
<b>SITE BENCHMARK</b>						
	Benchmark per ha	£1,200,000				
	Site benchmark				£600,000	
	SDLT				£19,500	
	Agents and legal	1.75%			£10,500	
	Total site costs					<b>£ 630,000</b>
<b>SCHEME COSTS</b>						
	Build costs	£ 1,996	per sq m		£ 17,461,000	
	Building standards	2.50%	of base build costs		£ 436,525	
	External costs	10%	of base build costs		£ 1,746,100	
	<b>Total construction costs</b>					<b>£ 19,643,625</b>
	Professional fees	8.00%	of construction costs		£ 1,571,490	
	Sales and lettings costs	3%	of GDV		£ 959,270	
	Planning obligations				£ 400,000	
	Other policy costs				£ 188,560	
	<b>Total 'other costs'</b>					<b>£ 3,119,320</b>
	Finance costs	6.0%	Interest rate			
	Build period	24	Months			
	Finance costs for 100% of construction and other costs				£ 2,807,153	
	<b>Total finance costs</b>					<b>£ 2,807,153</b>
	Developer return	15.0%	Scheme value			
	<b>Total scheme costs</b>					<b>£ 4,796,348</b>
						<b>£ 30,996,446</b>
<b>RESIDUAL VALUE</b>						
	Residual value		For the scheme			<b>£ 979,209</b>
			Equivalent per hectare			<b>£ 1,958,418</b>
						<b>Go to next stage</b>
<b>Potential for CIL</b>						
	Total potential scheme headroom				£ 979,209	
	Headroom per sq m				£ 140	



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## Equality Impact Assessment: Community Infrastructure Levy: Partial Review consultation

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

<b>Committee name and date:</b>	<b>Report Title</b>	<b>Decisions being recommended:</b>	<b>People with protected characteristics potentially impacted by the decisions to be made:</b>
Executive. 29.11.2022	Community Infrastructure Levy: Partial Review consultation	<p>That the Executive approves the Draft Charging Schedule (Appendix A) and supporting evidence (Appendix B and Appendix C) as the basis for public consultation for six weeks commencing in December 2022;</p> <p>That the Executive gives delegated authority to the Director of City Development, in consultation with the Council Leader, to agree minor changes to the Draft Charging Schedule (Appendix A) before it is published for consultation;</p> <p>That the Executive approves the submission of the Draft Charging Schedule (Appendix A), supporting evidence (Appendix B and Appendix C), consultation responses and other information as may be required, to enable an independent examination on the Draft Charging Schedule to take</p>	None specifically.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		<p>place, subject to there being no revisions to the proposed CIL charges following consultation; and</p> <p>That if further revisions to the CIL charges are proposed following consultation, an updated draft will be brought to Executive in advance of submission for examination.</p>	

**Factors to consider in the assessment:** For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

**High impact** – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

**Medium impact** –some potential impact exists, some mitigating measures are in place, poor evidence

**Low impact** – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<b>Race and ethnicity</b> (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Disability:</b> as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Sex/Gender</b>	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Gender reassignment</b>	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Religion and belief</b> (includes no belief, some philosophical beliefs such	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative

<b>Protected characteristic/ area of interest</b>	<b>Positive or Negative Impact</b>	<b>High, Medium or Low Impact</b>	<b>Reason</b>
as Buddhism and sects within religions).			requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual).	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Age</b> (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Pregnancy and maternity</b> including new and breast feeding mothers	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability evidence. The consultation will meet the requirements of the consultation charter.
<b>Marriage and civil partnership status</b>	Neutral	N/A	The recommendation to consult on the partial review of the CIL Charing Schedule will have a neutral impact on groups with protected characteristics. This is a technical consultation to meet legislative requirements and significantly focuses on development viability

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			evidence. The consultation will meet the requirements of the consultation charter.

**Actions identified that will mitigate any negative impacts and/or promote inclusion**

N/A

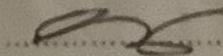
**Officer:** George Marshall: Assistant Service Lead: Local Plans

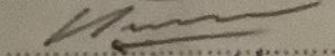
**Date:** 3 November 2022

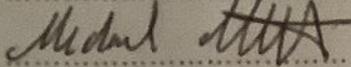
**Exeter City Council**

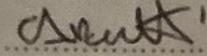
**Request For Call-In Of Executive Decision  
Under Standing Order 17**

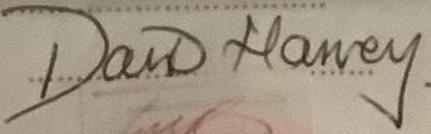
We, the following Scrutiny Committee Members

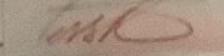
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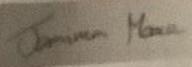
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(7) 

(8) .....

(to be signed by at least seven Scrutiny Members)

request that Minute ...9..... relating to the issue of Community Infrastructure Levy: Partial Review Consultation approved by the Executive on Tuesday 29<sup>th</sup> November 2022

be called in for scrutiny by ...Strategic .... Scrutiny Committee, for the following reason:

**1. Deficient process:**

- a) At the July 2019 executive, and agreed at the subsequent Council, the allocation of a budget of up to £75,000 in order to instruct Consultants to review the Community Infrastructure Levy Charging Schedule was allocated. The decision was a for a review not a partial review, a partial review was not presented as an option in the paper.
- b) There has been no report back or request to Executive and Council to change the decision to for partial review to be undertaken as an alternative option since the decision in 2019 above was taken.

**2. Decision-maker failed to take account of relevant factors:**

- a) The Executive have failed to take into consideration the consequences of not taking a full review. The issues for consideration which were set out on P14 in the procurement pack of 12<sup>th</sup> February 2020 ref no: PR 772019 HR.
- b) The partial review omits consideration of other factors such as the assumption is that the Exeter Development Fund will proceed, but as identified in the Council's risk register the fund is high risk, so if it doesn't proceed then then there may not be sufficient CIL to contribute to required infrastructure.

**3. Decision maker is wrong in fact or law:**

The Executive paper (29/11/22) includes 'co-living': this is not defined in planning policy either nationally or locally. Local schemes branded as 'co-living' have been bought forward as build to rent schemes, which are defined in law. There is no basis therefore for such an undefined term to be used in a planning document which requires absolute clarity to determine CIL liability.

Dated: 1<sup>st</sup> December 2022

- This request must be delivered to the Corporate Manager Democratic & Civic Support by no later than 10am, 5 days after publication of the Executive decision.
- A special meeting of the relevant Scrutiny Committee will normally take place within 5 working days of the receipt of this notice by the Corporate Manager Democratic & Civic Support.
- A resolution/recommendation made by the Executive may only be called in once for reconsideration.

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