Summary Note on the Main Areas of Dispute for the Viability Evidence

- 1.1 This document has been formed in response to Panel Note 9 ("NLP_EX_32_Panel Note No. 9 viability") which requests that the Mayor prepares, in liaison with participants, a short summary note identifying the main areas of dispute relating to the viability evidence supporting the draft Plan.
- 1.2 Panel Note 9 identifies four areas that should be covered to help focus the discussion for Matter 92. The areas are set out below and related information can be found in Appendices A to D:
 - A list of the policies in the Plan that are likely to have a significant effect on development costs and/or development values: **Appendix A.**
 - LPVS assumptions about the costs of different types of development, with alternative figures suggested by other participants: **Appendix B.**
 - LPVS assumptions about the values of different types of development, with alternative figures suggested by other participants: **Appendix C.**
 - LPVS assumptions about benchmark land values, with alternative figures suggested by other participants: **Appendix D.**
- 1.3 The table at Appendix A includes the main policies referred to in participants' statements as having the potential to significantly effect development costs and/ or values. The focus of the note is on the main areas of dispute and policies have not been included where these were not previously referenced as significantly effecting development costs and/ or values in participants' statements. Inclusion of a policy within the table does not indicate that the GLA consider that this will have a significant detrimental impact on development viability.
- 1.4 The tables at Appendices B to D include the main cost/value/benchmark land value (as relevant) related viability assumptions within the LPVS and supporting documents referred to in participants' statements where alternative figures were suggested and participants indicated that inputs are too high or too low, as requested in Panel Note 9.
- 1.5 A draft version of this note was provided to participants for Matter 92. The note has been updated to indicate where participants consider that policies are likely to have a significant effect on development costs and/or values; alternative figures suggested by participants; and, where participants consider that the figures adopted should be higher or lower. Comments provided by participants which repeat points made in their previous written submissions or introduce new information which is beyond the scope of Panel Note 9 have not been included.

Appendix A: Policies in the draft Plan that are likely to have a significant effect on development costs and/or development values

Policy Reference	Policy Title
H2 H	Small sites
H5	Delivering affordable housing
H6	Threshold approach to applications
H13	Build to rent
H15	Specialist older person's housing
H17	Purpose-built student accommodation
E3	Affordable workspace

E7	Industrial intensification, co-location and substitution
G5	Urban greening
SI1	Improving air quality
SI2	Minimising greenhouse gas emissions
T6.3	Retail parking

Appendix B: Main cost related viability assumptions in evidence documents and alternative figures suggested by participants

Theme	LPVS Costs Assumptions					Participant alternative figure	Participant comment where no alternative – too high/ too low		
Build costs (residential typologies)	heights, le additiona Paragraph ranges us consultan	evels of a l cost assumed 5.6 of the ed in the t Turner a	ffordable umptions ne LPVS o viability to and Town	housing p which are utlines the esting pro	rovision, detailed i e base bu vided by	cost	London First: Modelled "5% increase" to base build costs.	Just Space: Costs too low.	
	Storeys	Base Band A	Base Band B	Base Band C	Base Band D	Base Band E			
	1 to 3	£2,965	£2,825	£2,708	£2,475	£2,280			
	4 to 10	£3,140	£2,990	£2,883	£2,625	£2,555			
	11 to 20	£3,380	£3,220	£3,078	£2,825	£2,760			
	21+	£3,550	£3,400	£3,254	£2,950	£2,900			
	• Safe at £20 5.8.14 where • Energy	et out in to s, Safe and and Secu D per sq m 1), and fire appropri gy Stand mance -	the LPVS. d Secure Is Ire Enviro for schel e evacuat ate (LPVS ards - rel £1,500 pe	This incluent on the control on the control of the	ents and E relating to 10 storeys £20,000 ondon LE	AN			
	local I	nard and	soft lands	caping, ex	ternal am	works such a nenity space, ions calculate			

Theme	LPVS Co						Participant alternative figure	Participant comment where no alternative – too high/ too low
	Safe a	ınd Secure	Environm	nent costs	(LPVS 5.6			
	Standards	ase build cos , Safe and So gross floors	ecure Enviro					
	Storeys	Average for Band A	Average for Band B	Average for Band C	Average for Band D	Average for Band E		
	1 to 3	£3,178	£3,029	£2,879	£2,633	£2,533		
	4 to 10	£3,386	£3,227	£3,086	£2,813	£2,739		
	11 to 20	£3,621 £3,807	£3,450 £3,647	£3,270 £3,459	£3,003 £3,137	£2,934 £3,084		
	such a and E (LPVS Sensitest a Adder Floor tested This recosts	r Addition as Demolit lectric Veh 5 5.6 onwa tivity Tes a Abnorma dum Tabl Area Eff I reduced esults in the increasing ate that is	ion Costs nicle Chargerds). sting: Add al Costs so e 5.2). iciency B gross to n ne saleable . This is in	at £29 per ging and P ditional co cenario at uild Cost et efficien e area beir addition				

Theme	LPVS Cos	sts Assun	nptions				Participant alternative figure	Participant comment where no alternative – too high/ too low		
Build costs (student development)	The build Turner an					,		Tide Construction: Too low.		
acreio pinionio,		udent build gross floors		R1 and SR2						
		Band A	Band B	Band C	Band D	Band E				
	SR1	£2,497	£2,	459	£2,	.307				
	SR2	£2,609	£2,	570	£2,	411				
	resulting i	ed to the beat to the beat to the following the total to the beat to the total to t	oase costs owing rate	at £166 p	er sq m (l ne testing	_PVS 6.3.7] :	,			
	3	Band A	Band B	Band C	Band D	Band E				
	9 Storeys	£2,663	£2,	625	£2,	.473				
	15 Storeys	£2,775	£2,	736	£2,	.577				
	Addition sq m over relevant p	the site a	rea (LPVS			at £29 per h other				
Build costs (mixed use /		Build costs for the mixed use / supermarket typologies incorporate costs for the residential component as set out					Tesco: • Typology 1 (Band C) £3,509 per sqm	Sainsburys: costs too low.		

Theme	LPVS Costs Assumptions						Participant alternative figure	Participant comment where no alternative – too high/ too low	
supermarket typology)	above, and for the below. The build costs app depending on the spaces (LPVS Adde Table 4: Supermarket £ per sq m on superm	olied for the ocation, no endum 4.26	e superma umber and 5). For MU5 and	irket sche I form of t	mes vary	 Typology 2 (Band B) £3,529 per sqm Typology 3 (Band D) £2,959 per sqm Typology 4 (Band C) £2,959 per sqm (Appendix B, Tesco March 2018 representations) 			
	MU5	£4,	470	£4	,289				
	MU6	£3,	054	£2	,971				
	 External World local hard and splay, footpaths at 8.55% on base of the control of t	and rapid e cs – relatin soft landsc , drainage se build co 58 baseme for MU6 ir in Band D c Car Char Idendum 4	g to allow aping, ext and service osts (LPVS nt parking n Value Ba (LPVS Ad ging calco	r charging vance for vernal ame te diversion 5.6.10). If spaces for Inds B and dendum 4 ulated at 1	works such enity space ons calcula or MU5, 6 d C and 10 4.26). E40,000 pe	e, ted 7 00 er			

Theme	LPVS Costs Assumptions	Participant alternative figure	Participant comment where no alternative – too high/ too low	
	• Additional Abnormal Costs equating to £183 per sq m were applied in the sensitivity testing for MU5 (LPVS Addendum Table 5.2).			
Older people's accommodation – sheltered housing	Residential build costs as set out above. 20% allowance for communal/circulation space for sheltered accommodation and 35% for extra care.	Retirement Housing Consortium – gross to net of 26% for sheltered housing.		
Developer return	Developer return was informed by information from various sources including developer accounts and viability appraisals assessed by the GLA (LPVS Technical Report Annex G). Returns for residential properties for sale were assessed at 15 – 20% on Gross Development Value (GDV), 11-13% on GDV for Build to Rent and 15% on GDV for non-residential development.	Tesco: Testing at 35% affordable housing • Viable > 20% on GDV • Marginal 15 < 20% GDV • Unviable < 15% GDV (Appendix 1, Paragraph 6.2, March 2018 representations) London First: 15% on GDV for Build to Rent.	London First (non-residential): Too low.	
Finance	Finance costs were informed by viability appraisals assessed by the GLA and were applied at a rate of 6.5% on development costs. Finance costs were applied to both developer return and land costs within the LPVS. Within the LPVS Addendum finance costs were not applied on developer return as finance costs would not be incurred on returns.	Tesco: 6.6% adopted for testing purposes (Appendix 1, para 5.13, March 2018 representations) London First: Modelled "1% increase" (7.5%) (Consultation response 4.3.10)	Tide Construction: Too low (student accommodation)	

Theme	LPVS Costs Assumptions						Participant alternative figure	Participant comment where no alternative – too high/ too low
CIL / S106						Ī	CIL and MCIL rate appropriate to	Home Builder's Federation:
	Table 5:	CIL rates			T		Borough and Mayoral levels tested (Appendix 1, paragraph 5.11 and	S106 cost could be too low.
	Band A	Band B	Band C	Band D	Band E		Appendix 1, paragraph 3.11 and Appendix B, March 2018	
		T	Borough (CIL			representations)	
	£ 563	£ 309	£ 128	£ 114	£ 63			
		<u>Ma</u>	yor of Lond	on CIL				
	£ 80	£ 80	£ 60	£ 60	£ 25			
	CIL is typically charged on net additional floorspace, CIL rates were applied to all GIA floorspace in the LF costs do not take into account the reduction allowed existing floorspace under the CIL Regulations (LPVS 19). CIL costs applied in LPVS Addendum took into accoreduction allowed for existing floorspace under CIL Regulations based on LDD completions data. Additional allowance of £1,500 per unit for local mit direct development impacts/ requirements not cove such as employment and training (LPVS 5.8.20). Seponts for carbon offset contributions were also applied.					PVS - CIL d for 5 5.8.17 to unt tigation of ered by CIL parate		
Urban Greening	additiona urban gre greening	l external (eening cost	cost allow ts (see ab 41.50 per	rance of 8 ove). Cost sq m app	wnsend includ .55% which in for premium lied to all dev D).	ncluded urban	SEGRO: Additional costs of green roofs on industrial development circa £123 per sq m.	London First: Too low

Appendix C: Main value related assumptions in viability evidence documents and alternative figures suggested by participants

Theme	LPVS Valu	ie Assump	tions			Participant Input	Participant comment where no alternative – too high/ too low			
Residential Sales Values	Land Regis Report Ani	stry Data an nex B):	d are set o	ut in Table	S were based 1 (LPVS 5.4	d on analysis of I, Technical	which residential values were reduced by 5% to represent a reasonable test of variation in the			
	Table 1: Re	esidential sa	les values £	per sq m	1		market (consultation response, ref			
	Band A	Band B	Band C	Band D	Band E		4.3.10).			
	£20,000	£12,000	£8,250	£6,250	£4,250		Tesco:			
						dum. Further at Section 2.	 Typology 1 (Band C) £9,146 per sqm Typology 2 (Band B) 			
	Table 2: Ro Addendum	esidential sa ı)	les values £	per sq m (L	PVS		£9,684 per sqm • Typology 3 (Band D)			
	Band A	Band B	Band C	Band D	Band E		£5,487 per sqm			
	£19,714	£12,185	£8,500	£6,350	£4,675		• Typology 4 (Band C)			
		•	•	•	•	£8,608 per sqm (Appendix B – Tesco March 2018 representations)				

Residential Rents

Residential rents applied in the LPVS were based on various sources including rents advertised by agents and online and published by data consultancies such as Molior (Technical Report, Annex B). Residential rents vary by bedroom size and dwelling type. The range of rents applied for each value band are set out in Table 2:

Table 3: Bu charges)	Table 3: Build to Rent – Weekly Rents (excluding service charges)									
Band A Band B Band C Band D Band E										
£672 -	£451 -	£345 -	£288 -	£230 -						
£1,335	£874	£644	£518	£389						

London First: Ran an additional scenario in which residential rents and values reduced by 5% to represent a reasonable test of variation to the market (consultation response Ref 4.3.10)

Affordable Housing Values

A range of affordable housing tenures were tested based on the Mayor's preferred affordable housing products. Rents for London Affordable Rent (LAR) and London Living Rent (LLR) were tested at the rent benchmarks published by the GLA in 2017.

Table 4: Weekly rents for LLR and LAR (£)										
Tenure										
Tellule	Tenure A B C D E									
	144-	144-	144-	144-	144-					
London Affordable Rent	170	170	170	170	170					
	270 -	205-	180-	175-	180-					
London Living Rent	390	310	270	250	250					

For London Shared Ownership (LSO) rents on retained equity and shares sold were 2.50% and a 35% share sold for Value Band C; and 2.75% and 40% for Value Bands D and E. Discount Market Rent was tested at various discounts to market rent for different value bands: 40% (A), 60% (B), 80% (C-E). See LPVS Technical Report Annex B and D.

London First: reduction of 20% in the London First additional scenario.

Tesco:

- Typology 1 (Band C) £4,486 per sqm
- Typology 2 (Band B) £5,207 per sqm
- Typology 3 (Band D) £2,980 per sqm
 Typology 4 (Band C)
- £4,723 per sqm (Appendix 1, Appraisal Typology 1 Appendix B – Tesco March 2018 representations)

Just Space: Too high - do not reflect social target rent levels.

	Further informange of so transaction was undert - £5,100 pe	urces include prices for S aken with L	ding housin 5106 afford AR values	ig associatio lable housir at <i>£</i> 2,200 p	on accounts			
Value of Student Accommodation	Student acc Cushman a market repo Student Acc	nd Wakefie orts; and JL commodatio	ld's Studen L's <i>UK Stud</i>	t Bed space dent Housir 2015 by the	e cost analy ng Q1 2017	N/A	Tide Construction: • Too high.	
	Band A	Band B	Band C	Band D	Band E £127,000			
	Student accommodaccommoda	dum Report	which revie					

Appendix D: Main benchmark land value related assumptions in viability evidence documents and alternative figures suggested by participants

Theme	LPVS Input/Positio	n			Participant Input	Participant Comment
Residential / Non- Residential	BLVs applied in the st proposals assessed as LPVS Technical Report BLVs have been calculated comparison between sindividual site charactivariation in urban device be accounted for whe Low, mid and high BL follows: Table 1 - Resident unit	part of the plact Annex J, LP\ lated on a per sites where typ eristics are not relopment sites on calculating la	nning process (L /S Addendum Ar unit basis which ologies are being known. This also and their capaci and values on a s ated for resident	PVS Section 8, nnex J). enables g tested and oreflects the lity which may no lite area basis. ial uses as	 Typology 1 (Band C) £175 per sqm mixed use (£16,000,000); Typology 2 (Band B) £387.51 per sqm mixed use (£14,500,000); Typology 3 (Band D) 	Home Builder's Federation, London First, Tesco / Sainsburys (supermarket typologies), Tide Construction (student accommodation), Retirement Housing Consortium (Older People's Accommodation): BLVs too low.
	Value Band	Low	Mid	High	£209.11 per sqm mixed use (£6,500,000); • Typology 4 (Band C)	
	Band A	£75,000	£190,000	£300,000	£1,360 per sqm mixed use (£12,000,000)	
	Band B	£40,000	£75,000	£110,000	(Appendix B March 2018 representations)	
	Band C	£30,000	£55,000	£80,000		
	Band D	£20,000	£35,000	£50,000		
	Band E	£10,000	£20,000	£30,000		

1e	LPVS Input	/Position			Participant Input	Participant Comment
				gies Res 7 and Res 10 in land values across		
	Table 2: Typ Values	ology Res 7 (300 re	esidential units) Ben	chmark Land		
	Value Band	Low	Mid	High		
	Band A	£22,500,000	£57,000,000	£90,000,000		
	Band B	£12,000,000	£22,500,000	£33,000,000		
	Band C	£9,000,000	£16,500,000	£24,000,000		
	Band D	£6,000,000	£10,500,000	£15,000,000		
	Band E	£3,000,000	£6,000,000	£9,000,000		
	Table 3: Typ Values	ology Res 10 (750	residential units) Be	enchmark Land		
	Value Band	Low	Mid	High		
	Band A	£56,250,000	£142,500,000	£225,000,000		
	Band B	£30,000,000	£56,250,000	£82,500,000		
	Band C	£22,500,000	£41,250,000	£60,000,000		
	Band D	£15,000,000	£26,250,000	£37,500,000		
	Band E	£7,500,000	£15,000,000	£22,500,000		
	BLVs for resi	dential and non-r	esidential uses. Th	as also used to inform is was calculated on a tial uses with a smaller		

LPVS I	nput/Pos	sition		
		-residential uses		omparison betwee
Table 4	4 – Non- Re	esidential Benchn	nark Land Values £	per sq m
Value	e Band	Low	Mid	High
Cer	ntral	£815	£2,065	£3,261
l	nner	£326	£598	£870
1111				
Ou	uter	£109 BLVs applied fo	£217 r typology NR2 a	£326 s an example:
Ο ι Table 5	uter s show the	BLVs applied fo		s an example:
Table 5	uter s show the	BLVs applied fo	r typology NR2 a	s an example:
Table 5 Values	uter 5 show the 5 - Typolog	BLVs applied fo	r typology NR2 a	s an example:
Table 5 Values Value Ce	show the Typolog Band	BLVs applied fo	m office scheme)	s an example: Benchmark Land High