## Westminster City Council: Local Plan policies: Viability Review

Prepared for
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## 0 Executive Summary

0.1 The NPPF states that "Plans should set out the contributions expected in association with particular sites and types of 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, green and digital infrastructure). Such policies should not undermine the delivery of the plan". This summary report and its supporting appendices test the ability of development typologies in Westminster to support local plan policies while making contributions to infrastructure that will support growth through CIL
0.2 The testing relies upon a series of residual valuations of development typologies based on developments that have come forward in the City in the recent past. The residual value of each development is calculated by deducting the costs of development (build costs, fees, disposal costs, finance and profit) from the value of the completed building.
0.3 The residual values for each typology have been used to test the impact of the main policies which may have an impact on viability:

- Affordable housing: We have appraised residential schemes with $35 \%$ affordable housing in line with draft policy 9 (Policy 10 in the Regulation19 version of the plan) which seeks to maximise delivery of affordable housing in accordance with London Plan policy H6 ${ }^{1}$. The tenure of the affordable housing is assumed to be 40\% rent (tested assuming social rents) and 60\% intermediate, with four tiers of household income levels to ensure units are affordable to a range of those in need of intermediate housing.
- The results of the appraisals show that the Council's policy approach will not have an adverse impact on viability. The results of appraisals with lower levels of affordable housing demonstrate that the gains in terms of 'viable' outcomes are very limited in comparison to the likely losses of affordable housing units that would result from a reduction below $35 \%$. Furthermore, the Council's draft policy indicates that they will have regard to scheme-specific viability issues where these arise in exceptional circumstances.
- Commercial scheme contribution towards affordable housing: The Council's requirement for commercial (office and hotel) schemes to contribute towards affordable housing should be readily absorbed by most office schemes but will need to be applied flexibly on hotel developments.
- Sustainability requirements: the results of our appraisals indicate that sustainability requirements in the draft plan have a modest impact on overall viability and should be readily accommodated in almost all circumstances.
0.4 The Mayor of London adopted a replacement Charging Schedule (MCIL2) on 1 April 2019 which significantly increased CIL rates for office, retail and hotel developments in Westminster. These rates have been incorporated into our appraisals (alongside Westminster CIL with indexation). Clearly the imposition of higher Mayoral CIL rates may impact on the ability of the Council to increase its own rates in the future.
0.5 Viability measured in present value terms is only one of several factors that determine whether a site is developed. Developers will often 'take a view' on future growth when deciding to proceed with developments and may therefore be in a position to absorb policy requirements even if these are unviable on a present day basis.
0.6 It is vital that developers do not overpay for sites in the anticipation of mitigating this overpayment by reducing the Council's planning requirements.

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## 1 Introduction

1.1 Westminster City Council ('the Council') has commissioned this study to consider the ability of developments to accommodate emerging Draft Local Plan policies alongside adopted Westminster Community Infrastructure Levy ('CIL') rates. The aim of the study is to assess at high level the viability of development typologies representing the types of sites that are expected to come forward to test the impact of emerging policies.
1.2 In terms of methodology, we adopted standard residual valuation approaches to test the viability of development typologies, including the impact on viability of the Council's emerging planning policies alongside adopted levels of Westminster CIL. However, due to the extent and range of financial variables involved in residual valuations, they can only ever serve as a guide. Individual site characteristics (which are unique), mean that the conclusions must always be tempered by a level of flexibility in application of policy requirements on a site by site basis.
1.3 In light of the above we would highlight that the purpose of this viability study is to assist the Council in understanding changes to the capacity of schemes to absorb emerging policy requirements. The study will form part of the Council's evidence base for its emerging Local Plan through Examination in Public. The Study therefore provides an evidence base to show that the requirements set out within the National Planning Policy Framework ('NPPF') and National Planning Practice Guidance ('NPPG') are satisfied.
1.4 As an area wide study this assessment makes overall judgements as to viability of development within the City of Westminster and does not account of individual site circumstances which can only be established when work on detailed planning applications is undertaken. The assessment should not be relied upon for individual site applications. However, an element of judgement has been applied within this study with regard to the individual characteristics of the sites tested. The schemes tested on these sites are based either on submitted planning applications or assessments of likely development capacity and the latter this may differ from the quantum of development in actual planning applications that will come forward. The NPPF makes it clear that once a Local Plan has been tested, the starting presumption is that policy requirements are viable and the onus is on applicants to justify the need for site specific viability assessments to justify non-policy compliant schemes.
1.5 This position is recognised within Section 2 of the Local Housing Delivery Group guidance ${ }^{2}$, which identifies the purpose and role of viability assessments within plan-making. This identifies that: "The role of the test is not to give a precise answer as to the viability of every development likely to take place during the plan period. No assessment could realistically provide this level of detail. Some sitespecific tests are still likely to be required at the development management stage. Rather, it is to provide high level assurance that the policies within the plan are set in a way that is compatible with the likely economic viability of development needed to deliver the plan." Although the new NPPF emphasises testing of the viability of policies in emerging plans, the pattern of development in areas such as Westminster is too complex for upfront planning testing to reflect all individual site circumstances. However, the study plays an important role in testing the parameters within which local plan policies will operate.
1.6 The City of Westminster covers an area of 2,149 hectares, $76 \%$ of which is covered by conservation areas, with over 11,000 listed buildings and structures, a world heritage site, and five royal parks. Of this area, $38.2 \%$ ( 821 hectares) comprises greenspace. The remaining 1,323 hectares has to provide space among other things for development on a scale, and of a diversity, found nowhere else in the UK - for example:

[^1]- a resident population of over 230,000, projected by the Greater London Authority to grow to 242,100 by $2020,250,000$ by 2025 and to 254,600 by 2030 . New housing targets introduced through the further alterations to the London Plan published in March 2015 suggest a need for at least 10,607 new homes between 2015 and 2025. Taking account of the area of land in the city actually available for building, Westminster already has a density of population comparable to that of Islington, the borough with the highest density of population in London.
- A workforce filling 717,400 jobs in over 50,000 active businesses (in both cases the most of any London borough), occupying 9 million square metres of office floor space and 8,500 retail premises covering 2.5 million square metres. The Greater London Authority's ('GLA') employment projections estimate that Westminster might see job growth of over 10\% into the 2030s (GLA Economics, 2013).
- A retail and leisure complex in the West End that is the largest in London, attracting 55 million tourist trips to Westminster annually.
1.7 Westminster is also unusual in terms of the concentration of land ownership, with large landholdings by the Crown Estate and the Duke of Westminster (among others), as well as other developers prepared to take a longer term view on the value generated by developments. These owners are often prepared to proceed with developments that are notionally unviable as a short term 'speculative' development, on the basis that their asset value is enhanced in the long term.


## Economic and housing market context

1.8 The implementation of Local Plan policies is heavily reliant upon the private sector to bring forward development to realise the vision of housing and employment growth. The propensity of landowners and developers to bring forward sites for development is dependent upon economic conditions, including demand and pricing of space in new developments. The housing and commercial property markets are inherently cyclical and also affected by internal and external shocks. The downwards adjustment in house prices in 2008/9 was followed by a prolonged period of real house price growth. By 2010 improved consumer confidence fed through into more positive interest from potential house purchasers. However, this brief resurgence abated with figures falling and then fluctuating in 2011 and 2012. The improvement in the housing market towards the end of 2012 continued through into 2013 at which point the growth in sales values improved significantly through to the last quarter of 2014, where the pace of the improvement was seen to moderate and continued to do so in 2015. The UK economy sustained momentum following the result of the UK's referendum on its membership of the European Union (EU), and as a result the UK housing market surprised many in 2016. The average house price rose $4.5 \%$, which was $0.2 \%$ lower than our forecast and ahead of the level recorded in 2015. While first time buyer numbers continued to recover in 2016, overall transaction levels slowed as some home movers and investors withdrew from the market.
1.9 The referendum held on 23 June 2016 on the UK's membership of the EU resulted in a small majority in favour of exit. The immediate aftermath of the result of the vote was a fall in the Pound Sterling to a 31-year low and stocks overselling due to the earnings of the FTSE being largely in US Dollars. As the Pound dropped significantly this supported the stock market, which has since recouped all of the losses seen and is near the all-time highs. We are now in a period of uncertainty in relation to many factors that impact the property investment and letting markets. In March 2017, the Sterling Exchange Rate Index fell a further 1.5\% from the end of February and was 10.5\% lower compared with the end of March 2016. However in other areas there are tentative signs of improvement and resilience in the market. For example, the International Monetary Fund revised its forecast for UK growth in 2016 on 4 October 2016 from $1.7 \%$ to $1.8 \%$, thereby partly reversing the cut it made to the forecast shortly after the referendum (1.9\% to $1.7 \%$ ). However it further trimmed its 2017 forecast from $1.3 \%$ to $1.1 \%$, which stood at $2.2 \%$ prior to the Referendum.
1.10 The UK's first official growth figures since the referendum result vote exceeded initial estimates. Growth for Q3 according to the ONS figures was $0.5 \%$, higher than analyst's predictions of $0.3 \%$. The ONS highlighted that "the pattern of growth continues to be broadly unaffected following the EU referendum". Initial expectations were that the better than expected GDP figures would deter the

Bank of England Monetary Policy Committee from going ahead with any further or planned interest rate cuts. The Economy slowed slightly from the Q2 figure of $0.7 \%$ and the pattern was a slightly unbalanced one with services being the only sector continuing to grow, achieving a rate of $0.8 \%$. The Chancellor, Phillip Hammond, noted at the time that "the fundamentals of the UK economy are strong and today's data show that the economy is resilient". Production increased by $1.6 \%$ in the 3 months to February 2017 and manufacturing increased by $2.2 \%$ over the same period.
Notwithstanding this the ONS indicate that "manufacturing is dependent upon both domestic and overseas demand for UK produced goods. Changes in output will reflect both domestic demand and how UK trade is faring post-referendum"; especially as Article 50 has now been triggered and the negotiation process to leave the EU is underway. Data from the construction sector indicated that the quarterly movement shows a growth of $1.5 \%$ in output, which the ONS state "may act as an indicator of how confident enterprises are in investing in buildings and the infrastructure as longer term assets".
1.11 It was further expected that manufacturing would be bolstered by the fall in the value of the pound; however this failed to materialise. Despite this, the ONS Head of GDP Darren Morgan observed that "the economy grew slightly more in the last three months of 2016 than previously thought, mainly due to a stronger performance from manufacturing".
1.12 The Office of Budgetary Responsibility's 'Economic and fiscal outlook' report (November 2017) indicates that UK GDP slowed to an annualised rate of $1.2 \%$ over the first three quarters of 2017, caused largely by the impact of the fall in sterling feeding through into consumer facing services. In addition, the construction sector saw output fall in the second and third quarters of the year.
1.13 BNP Paribas Real Estate’s UK Housing Market Prospects Q3 2017 report indicates that "our Q2 forecast for a period of muted activity and price change remain unchanged". In this report we note that "we expect the average UK house price to rise by around $3.5 \%$, effectively remaining close to flat in real terms given the current pace of inflation. We expect the average UK home to have increased in value by $13.7 \%$ or just over $£ 28,000$ over the next four years. This translates to an average UK house price increase of $3.4 \%$ per annum, although given the political and economic uncertainties ahead, the journey is unlikely to feel quite so benign with the average masking inevitable volatility".
1.14 The May Halifax House Price Index Report identifies that overall prices in the three months to April were marginally lower than in the preceding three months; the first quarterly decline since November 2012. The annual rate of growth remained at $3.8 \%$ in April, the lowest rate since May 2013. Martin Ellis, the Halifax housing economist comments that, "Housing demand appears to have been curbed in recent months due to the deterioration in housing affordability caused by a sustained period of rapid house price growth during 2014-16. Signs of a decline in the pace of job creation, and the beginnings of a squeeze on households' finances as a result of increasing inflation may also be constraining the demand for homes".
1.15 This view is shared by Robert Gardiner, Nationwide's Chief Economist, who comments in their April House Price Index report, that "in some respects, the softening in house price growth is surprising because the unemployment rate is near to a 40-year low, confidence is still relatively high and mortgage rates have fallen to new all-time lows in recent months". However he balances this by highlighting that, "while monthly figures can be volatile, the recent softening in price growth may be a further indication that households are starting to react to the emerging squeeze on real incomes or to affordability pressures in key parts of the country".
1.16 Notwithstanding the above both the Halifax and Nationwide consider that a combination of the continuing low mortgage rates, together with an on-going acute shortage of properties on the market should support house prices. Nationwide conclude that as a result they remain of the opinion that "a small increase in house prices of around 2\% is likely over the course of 2017 as a whole". However, the outcome of the General Election on 8 June which saw the Conservative Party lose its majority may result in additional uncertainty in the short term, both in terms of the content of a legislative programme but also the negotiations on the UK's exit from the EU. These factors may impact on buyer activity.

## Local Housing Market Context

1.17 House prices in the City of Westminster have followed recent national trends, with values falling in 2008 to 2009 and recovering over the intervening years, as shown in Figure 1.15.1. Sales volumes fell below historic levels between 2009 and 2012, but have since recovered (see Figure 1.15.2). There was a notable spike in sales volumes prior to 1 April 2016 when additional Stamp Duty was levied to purchasers buying to rent or for second homes. By May 2018, sales values had increased by $97 \%$ in comparison to the lowest point in the cycle in March 2009, or $77 \%$ higher than the previous peak in December 2007.

Figure 1.15.1: Average sales value in Westminster


Source: Land Registry
1.18 There are differences between the different markets within Westminster, with values in the superprime market following a different trajectory to those in the prime and mainsteam markets. The super-prime market has been impacted more by the result of the referendum on the UK's membership of the EU than the other Westminster markets.

Figure 1.15.2: Sales volumes in Westminster (sales per month)


Source: Land Registry
1.19 The future trajectory of house prices is currently uncertain, although Strutt \& Parker's 'Residential Quarterly Report Summer 2018' prediction is that is that values are expected to increase over the next five years. Medium term predictions are that properties in Prime Central London markets will grow over the period between 2018 and 2022. Prices will remain unchanged in 2018 and then increase by $4 \%$ in 2019; $5 \%$ in 2020; $6 \%$ in 2021; and $6 \%$ in 2022. This equates to cumulative growth of $18 \%$ between 2018 and 2022 inclusive.

## Private rented sector market context

1.20 Nationally, the proportion of households privately renting is forecast to increase from under 10\% in 1991 to circa $25 \%$ by 2021, largely as a result of affordability issues for households who would have preferred to owner occupy ${ }^{3}$. Over the same period, the proportion of households owner occupying is forecast to fall from $69 \%$ to under $60 \%$. These trends are set to continue in the context of a significant disparity between average household incomes and the amounts required to purchase a residential property in the capital. In Westminster, 2011 census data indicates that circa $40 \%$ of households rent their homes, up $8 \%$ in comparison to the 2001 census ${ }^{4}$.
1.21 Perceived softening of the housing for sale market has prompted developers to seek bulk sales to PRS operators, with significant flows of investment capital into the sector. According to Molior, 40\% of residential units completed in London in the first half 2018 were sold into the private rented sector. Investment yields have remained stable in the London market at 3\% to 4\% and rents increased by $0.8 \%$ in the year to June $2018^{5}$. PRS housing as an asset class is still emerging and valuation portfolios and development opportunities is difficult in the context of lack of data. As the market matures, more information will become available, facilitating more sophisticated approaches to valuing and appraising PRS developments.
1.22 The PRS market is still immature and as a consequence there is little data available on management costs and returns that would assist potential entrants into the market. However, viability assessments of schemes brought forward to date confirm that profit margins are lower than build for sale on the basis that a developer will sell all the PRS units in a single transaction to an investor/operator. The income stream is therefore akin to a commercial investment where a $15 \%$ profit on GDV is typically sought.

[^2]1.23 A reduced profit margin helps to compensate (to some degree) for the discount to market value that investors will seek. PRS units typically transact at discounts of circa $20 \%$ of market value on the basis of build to sell. However, forward funding arrangements will help to reduce finance costs during the build period which offsets the reduction in market value to some degree.
1.24 On larger developments, PRS can help to diversify the scheme so that the Developer is less reliant on build to sell units. Building a range of tenures will enable developers to continue to develop schemes through the economic cycle, with varying proportions of units being provided for sale and rent, depending on levels of demand from individual purchasers. However, demand for build for rent product will also be affected by the health of the economy generally, with starting and future rent levels more acutely linked to changes in incomes of potential tenants.

## National Policy Context

## The National Planning Policy Framework

1.25 In July 2018, the government published a revised National Planning Policy Framework ('NPPF') and revised National Planning Practice Guidance ('NPPG').

Paragraph 34 of the NPPF states that "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".
1.27 Paragraph 57 of the NPPF suggests that "Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. 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".
1.28 In London and other major cities, the fine grain pattern of types of development and varying existing use values make it impossible to realistically test a sufficient number of typologies to reflect every conceivable scheme that might come forward over the plan period.

Prior to the publication of the updated NPPF, the meaning of a "competitive return" (the term used in the previous NPPF) had been the subject of considerable debate over the past year. For the purposes of testing the viability of a Local Plan, the Local Housing Delivery Group ${ }^{6}$ concluded that the current use value of a site (or a credible alternative use value) plus an appropriate uplift, represents a competitive return to a landowner. Some members of the RICS considered that a competitive return is determined by market value ${ }^{7}$, although there was no consensus around this view. The revised NPPF removes the requirement for "competitive returns" and is silent on how landowner returns should be assessed. The revised PPG indicates that viability testing of plans should be based on existing use value plus a landowner premium. The revised PPG also expresses a preference for plan makers to test the viability of planning obligations and affordable housing requirements at the plan making stage in the anticipation that this may reduce the need for viability testing developments at the development management stage. Local authorities have, of course, been testing the viability of their plan policies since the first NPPF was adopted, but have adopted policies based on the most viable outcome of their testing, recognising that some schemes coming forward will not meet the targets. This approach maximises delivery, as there is flexibility for schemes to come forward at levels of obligations that are lower than the target, if a proven viability case is made. The danger of the approach in the revised NPPF is that policy targets will inevitably

[^3]be driven down to reflect the least viable outcome; schemes that could have delivered more would not do so.

## Mayoral CIL

1.30 The city is located within Mayoral CIL Zone 1, which attracts a rate of $£ 50$ per square metre before indexation ${ }^{8}$ which has been used to fund circa $£ 300$ million of the costs of the Crossrail construction project. The consultation on the proposed amendments to the Mayoral CIL indicates that a rate of $£ 60$ per square metre will be levied in Westminster, with higher rates on offices ( $£ 185$ per square metre); retail ( $£ 165$ per square metre); and hotels ( $£ 140$ per square metre) within the Central Activities Zone. Future receipts from the Mayoral CIL will be used to contribute towards funding Crossrail 2 (a north-east to south-west line) to relieve pressure on existing transport networks.

## Westminster CIL

1.31 The Council approved its CIL Charging Schedule on 20 January 2016 and it came into effect on 1 May 2016. Table 1.30.1 below summarises the prevailing rates of CIL (the indexed rates are shown in italics ${ }^{9}$ ). For residential developments (covering all C use classes) in the Prime zone, the adopted rate is $£ 550$ per square metre. In the Core zone, the adopted rate is $£ 400$ per square metre; and in the Fringe zone the adopted rate is $£ 200$ per square metre. CIL rates for commercial development (offices, hotels, nightclubs, casinos and retail) are $£ 200, £ 150$ and $£ 50$ per square metre in the Prime, Core and Fringe zones respectively. All other uses attract a nil rate.

Table 1.28.1: CIL rates per net additional square metre in the Charging Schedule (indexed rates shown in italics)

| Development type | Prime | Core |  |  |
| :--- | :---: | :---: | :---: | :---: |
| Residential (all C uses) | $£ 550$ <br> $(£ 637)$ | $£ 400$ <br> $(£ 464)$ | $£ 200$ <br> $(£ 232)$ |  |
| Commercial (offices, <br> hotels, nightclubs, casinos, <br> retail) | $£ 200$ <br> $(£ 232)$ | $£ 150$ <br> $(£ 174)$ | $£ 50$ <br> $(£ 58)$ |  |
| All other uses |  | Nil |  |  |

## Local Policy context

1.32 There are numerous policy requirements that are now embedded in base build costs for schemes in London addressing London Plan requirements, which are mirrored in borough Local Plans (i.e. secure by design, lifetime homes, landscaping, amenity space, internal space standards, car parking, waste storage, tree preservation and protection etc). As these policy requirements are already priced in, we have focused on the new policies which add to the cumulative effect on development viability.
1.33 Westminster is drafting revisions to city Plan policies which it anticipates issuing for consultation later in $2018{ }^{10}$. We set out a summary of the policies identified as potentially having cost implications for developments below:

- Policy 8 seeks to increase housing delivery by targeting the delivery of 1,495 new homes per year and Policy 40 (Policy 42 in the Regulation19 version of the plan) seeks to ensure that housing is delivered at appropriate densities to optimise the use of land (following post-informal

[^4]consultation in 2018 the emphasis in this policy changed from 'appropriate density' to making the most efficient use of the site).

- Policy 9 seeks the delivery of $35 \%$ affordable housing on all schemes providing 10 or more residential units, or more than 1,000 square metres of residential floorspace. The Council will require a tenure mix of $60 \%$ intermediate housing and $40 \%$ for social or affordable rent. The Council's presumption is that affordable housing will be provided on site. The unit mix of affordable housing will be set out in an accompanying Affordable Housing Statement, updated annually. Upon publication of the Plan, the first statement will set out the following requirements:
- Social housing: $5 \%$ one beds; $40 \%$ two beds; $40 \%$ three beds, with the remaining $15 \%$ to be determined by the Council based on demands on the waiting list;
- Intermediate housing: 60\% one beds and $40 \%$ two beds (or larger).

For intermediate housing, the Council will seek to apply the following affordability criteria:

- $30 \%$ of households on incomes up to lower quartile;
- $25 \%$ of households on incomes between lower quartile to median;
- $25 \%$ of households on incomes between median to upper quartile;
- $20 \%$ of households on incomes between upper quartile and GLA upper income level for intermediate housing (currently $£ 90,000$ per annum).

Any payments in lieu will be charged at $£ 18,491$ per square metre in the Prime zone; $£ 12,450$ per square metre in the Core zone; and $£ 8,134$ per square metre in the Fringe zone ${ }^{11}$.

- Policy 9 requires that developments providing less than $35 \%$ affordable housing be subject to post permission viability reviews. This will be set out in an SPD and will use arrangements similar to the 'threshold' approach in the Mayor of London's Affordable Housing and Viability SPG.
- Policy 10 (Policy 11 in the Regulation19 version of the plan) sets standards for housing, including mix and unit configuration, as well as setting out the circumstances in which specialist housing will be supported.
- Policy 9 requires that self-contained housing schemes for older people provide $35 \%$ affordable housing.
- Policy 12 (Policy 11 in the Regulation19 version of the plan) requires that new student housing developments are let at rents that are at a level considered to be affordable to a student living away from home. This is defined in the London Plan Annual Monitoring Report as $55 \%$ of the maximum maintenance loan available to a student living in London and away from home, which currently equates to $£ 155$ per week. (following post-informal consultation in 2018 this policy changed to require $35 \%$ of the purpose-built student accommodation to be secured as affordable student housing as defined in the London Plan.)
- Policy 11 (Policy 12 in the Regulation19 version of the plan) requires that shared living or coliving schemes provide long term management. This would be a standard feature of a co-living scheme so creates no additional cost burden. Proposals for innovative housing which does not meet the definition of affordable housing will be required to meet the affordable housing policy which requires $35 \%$ as affordable. We note, however, that draft London Plan policy H18 (b) requires that $35 \%$ of units in purpose built shared living schemes should be provided at a $50 \%$ discount to market rent.
- Policy 9 (Policy 10 in the Regulation19 version of the plan) sets out the Council's requirements for financial contributions towards affordable housing from office and hotel developments exceeding 750 additional square metres.

[^5]- Policy 14 sets out a minimum marketing period of 18 months for floorspace which owners are seeking to convert to non-office use and sets out the Council's aims to deliver additional office floorspace and sets out a presumption in favour of retention of existing employment floorspace.
- Policy 15 sets out a minimum marketing period of 18 months for floorspace which owners are seeking to convert to non-retail use. In practice, this period reflects the reasonable void assumptions that developers would make in their appraisals when bidding for sites, so this requirement does not generate any additional burden.
- Policy 21 (Policy 23 in the Regulation19 version of the plan) sets out a minimum marketing period of 18 months for owners seeking to convert medical floorspace to other uses. This is not a development cost as any loss in income will be borne by existing owners through a reduction in the price developers offer to acquire such sites. Landowners will need to accept this outcome in order to crystallise the potential value arising from a change of use that is facilitated by the marketing period proving no demand. This is clearly a somewhat speculative process, as the marketing process could identify a suitable occupant, which would prevent the change of use.
- Policy 22 sets out a minimum marketing period of 18 months for owners seeking to convert institutional floorspace to other uses. This is not a development cost as any loss in income will be borne by existing owners. The same observations made in regards to Policy 21 (Policy 23 in the Regulation19 version of the plan) also apply here. (This policy was deleted in in the Regulation19 version of the plan).
- Policy 23 (Policy 24 in the Regulation19 version of the plan) sets out a minimum marketing period of 18 months for owners seeking to convert tailoring floorspace to other uses. This is not a development cost as any loss in income will be borne by existing owners. The same observations made in regards to Policy 21 (Policy 23 in the Regulation19 version of the plan) also apply here.
- Policy 18 Part B (Policy 17 Part B in the Regulation19 version of the plan) seeks to protect public houses and will only permit redevelopment for other uses if the premises are marketed for 18 months. This is not a development cost as any losses of income will be borne by existing owners. The same observations made in regards to Policy 21 (Policy 23 in the Regulation 19 version of the plan) also apply here.
- Policy 30 (Policy 19 Part D in the Regulation19 version of the plan) requires that all major development will contribute towards employment, training and skills initiatives and that communities benefit from the opportunities that are generated by development. This can include using developers' established approaches or programmes for employment and training initiatives in construction and operational phases. This policy is already embedded in existing policy (S19 of the Westminster City Plan) and therefore reflects existing best practice in the city.
- Policy 31 (Policy 20 in the Regulation19 version of the plan) outlines requirements for all new major developments to be designed to ensure they are capable of installation of up to date digital connectivity. This is a requirement that developers would be building into their developments as standard, as occupiers would expect this as a norm. There are no additional costs arising from the policy requirement.
- Policy 43 (Policy 45 in the Regulation 19 version of the plan) outlines requirements for security measures in high-risk developments. Developers will be aware of the particular requirement for such measures on the site they are seeking to develop and will reflect the requirements in their bids for the land.
- Policy 24 (Policy 26 in the Regulation19 version of the plan) sets out a requirement for cycle parking within developments. This does not exceed London Plan requirements and is already factored into development design.

■ Policy 24 (paragraph 24.7) (Policy 26, paragraph 26.12 in the Regulation19 version of the plan) indicates that the Council may require larger developments to accommodate a Cycle Hire docking station.

- Policy 28 relates to developments which do not provide car parking. Developers clearly have the choice to meet the parking standards set out in Policy 28 to avoid the need for mitigation measures.
- Policy 27 (Policy 31 in the Regulation19 version of the plan) requires that developments provide at least $50 \%$ of all electric vehicle charging points/spaces with 'active provision' - the remainder must be passive provision. This will be required by the market in any event as residents increasingly switch from petrol or diesel cars to electric.
- Policy 32 (Policy 33 in the Regulation 19 version of the plan) outlines a requirement for all new major development to be air quality neutral which reflects London Plan standards.
- Policy 36 (Policy 37 in the Regulation19 version of the plan) addresses climate change mitigation including carbon offset payments which are already in place.
- Policy 33 (Policy 36 in the Regulation19 version of the plan) reflects pre-existing requirements for developments to provide sustainable drainage systems.
- Policy 35 outlines requirements for open space which will need to be addressed through configuring building footprints to accommodate this requirement as well as green roofs.
1.34 In summary, most of the policies in the plan will not represent an additional financial burden upon developments. Where policies are likely to result in an additional financial burden, their impact has been incorporated into our appraisals.


## Development context

1.35 Westminster's stock includes diverse forms of housing, ranging from high density development to lower density housing. Westminster has virtually no surplus industrial land that can be released for housing and as a consequence of the historic fabric development tends to be small scale. Many sites accommodate existing offices, shops and housing with high existing use values and new housing is often delivered through change of use and enhancing densities of sites. Re-use and intensification of sites in Westminster also frequently delivers office, retail and other commercial floorspace in addition to new housing.
1.36 The diversity of Westminster's stock can also be seen through sales data. In the ten-year period 2008-2018, $85.8 \%$ of sales were for properties worth less than $£ 2$ million, with the remainder falling into the "prime" category. In 2018, $76 \%$ of properties sold for less than $£ 2$ million. Prime properties are widespread across Westminster, with a particular "core" in Knightsbridge and Belgravia, a "periphery" around Hyde Park and parts of Belgravia. Sales of properties worth $£ 5$ million+ show the same concentration around Knightsbridge and Belgravia with "hotspots" at St John's Wood and along Park Lane.
1.37 Westminster has few development sites of a significant scale, but does have three 'Opportunity Areas' (Paddington, Victoria and part of the Tottenham Court Road Area) which have already delivered a substantial quantum of new housing and commercial floorspace.

## 2 Methodology and appraisal approach

2.1 Our methodology follows standard development appraisal conventions, using locally-based sites and assumptions that reflect local market and planning policy circumstances. The study is therefore specific to Westminster and tests the Council's emerging planning policy requirements alongside existing CIL rates and emerging Mayoral CIL rates.

## Approach to testing development viability

2.2 Appraisal models can be illustrated via the following diagram. The total scheme value is calculated, as represented by the left hand bar. This includes the sales receipts from the private housing (the black hatched portion) and the payment from a Registered Provider ('RP') (the peach coloured chequered portion) for the completed affordable housing units. For commercial elements of a scheme, the value equates to the capital value of the rental income after allowing for rent free periods and purchaser's costs. The model then deducts the build costs, fees, interest, planning obligations, CIL and developer's profit. A 'residual' amount is left after all these costs are deducted this is the land value that the Developer would pay to the landowner. The residual land value is represented by the brown portion of the right hand bar in the diagram.

2.3 The Residual Land Value is normally a key variable in determining whether a scheme will proceed. If a proposal generates sufficient positive land value (in excess of existing use value, discussed later), it will be implemented. If not, the proposal will not go ahead, unless there are alternative funding sources to bridge the 'gap'.
2.4 Issues with establishing key appraisal variables are summarised as follows:

- Development costs are subject to national and local monitoring and can be reasonably accurately assessed in 'normal' circumstances. In Boroughs like Westminster, many sites will be
previously developed. These sites can sometimes encounter 'exceptional' costs such as decontamination. Such costs can be very difficult to anticipate before detailed site surveys are undertaken;
- Assumptions about development phasing, phasing of Section 106 contributions and infrastructure required to facilitate each phase of the development will affect residual values. Where the delivery of the obligations are deferred, the less the real cost to the applicant (and the greater the scope for increased affordable housing and other planning obligations). This is because the interest cost is reduced if the costs are incurred later in the development cashflow; and
- While Developer's Profit has to be assumed in any appraisal, its level is closely correlated with risk. The greater the risk, the higher the profit level required by lenders. While profit levels were typically up to around $15 \%$ of completed development value at the peak of the market in 2007, banks currently require schemes to show a higher profit to reflect the current risk. Typically developers and banks are targeting around $17-20 \%$ profit on value of the private housing element. Profit on commercial uses is typically included at $15 \%$ of value.
2.5 Ultimately, the landowner will make a decision on implementing a project on the basis of return and the potential for market change, and whether alternative developments might yield a higher value. The landowner's 'bottom line' will be achieving a residual land value that sufficiently exceeds 'existing use value ${ }^{12}$ ' or another appropriate benchmark to make development worthwhile. The margin above existing use value may be considerably different on individual sites, where there might be particular reasons why the premium to the landowner should be lower or higher than other sites.
2.6 Clearly, however, landowners have expectations of the value of their land which often exceed the value of the current use. Ultimately, if landowners' reasonable expectations are not met, they will not voluntarily sell their land and (unless a Local Authority is prepared to use its compulsory purchase powers) some may simply hold on to their sites, in the hope that policy may change at some future point with reduced requirements. However, the communities in which development takes place also have reasonable expectations that development will mitigate its impact, in terms of provision of community infrastructure, which will reduce land values. It is within the scope of those expectations that developers have to formulate their offers for sites. The task of formulating an offer for a site is complicated further still during buoyant land markets, where developers have to compete with other developers to secure a site, often speculating on increases in value.


## Viability benchmark

2.7 The NPPF is not prescriptive on the type of methodology local planning authorities should use when assessing viability. The 2021 National Planning Practice Guidance indicates that the NPPF requirement for a 'competitive return' to the landowner will need to allow for an incentive for the land owner to sell and options may include "the current use value of the land or its value for a realistic alternative use that complies with planning policy" (paragraph 024; reference ID 10-024-20140306). The 2018 NPPF indicates at paragraph 34 that "Plans should set out the contributions expected in association with particular sites and types of 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, green and digital infrastructure). Such policies should not make development unviable, and should be supported by evidence to demonstrate this". The draft PPG indicates that for the purposes of testing viability, local authorities should have regard to existing use value of land plus a premium to incentivise release for redevelopment.
2.8 The Mayor's Affordable Housing and Viability SPG focuses on decision making in development management, rather than plan making, but indicates that benchmark land values should be based on existing use value plus a premium which should be "fully justified based on the income generating capacity of the existing use with reference to comparable evidence on rents, which excludes hope value associated with development on the site or alternative uses".

[^6]2.9 The Local Housing Delivery Group published guidance ${ }^{13}$ in June 2012 which provides guidance on testing viability of Local Plan policies. The guidance notes that "consideration of an appropriate Threshold Land Value [or viability benchmark] needs to take account of the fact that future plan policy requirements will have an impact on land values and landowner expectations. Therefore, using a market value approach as the starting point carries the risk of building-in assumptions of current policy costs rather than helping to inform the potential for future policy".
2.10 In light of the weaknesses in the market value approach, the Local Housing Delivery Group guidance recommends that benchmark land value "is based on a premium over current use values" with the "precise figure that should be used as an appropriate premium above current use value [being] determined locally". The guidance considers that this approach "is in line with reference in the NPPF to take account of a "competitive return" to a willing land owner".
2.11 The examination on the Mayor of London's first CIL charging schedule considered the issue of an appropriate land value benchmark. The Mayor had adopted existing use value, while certain objectors suggested that 'Market Value' was a more appropriate benchmark. The Examiner concluded that:
"The market value approach.... while offering certainty on the price paid for a development site, suffers from being based on prices agreed in an historic policy context." (paragraph 8) and that "I don't believe that the EUV approach can be accurately described as fundamentally flawed or that this examination should be adjourned to allow work based on the market approach to be done" (paragraph 9).
2.12 In his concluding remark, the Examiner points out that
"the price paid for development land may be reduced [so that CIL may be accommodated]. As with profit levels there may be cries that this is unrealistic, but a reduction in development land value is an inherent part of the CIL concept. It may be argued that such a reduction may be all very well in the medium to long term but it is impossible in the short term because of the price already paid/agreed for development land. The difficulty with that argument is that if accepted the prospect of raising funds for infrastructure would be forever receding into the future. In any event in some instances it may be possible for contracts and options to be re-negotiated in the light of the changed circumstances arising from the imposition of CIL charges. (paragraph 32 - emphasis added).
2.13 It is important to stress, therefore, that there is no single threshold land value at which land will come forward for development. The decision to bring land forward will depend on the type of owner and, in particular, whether the owner occupies the site or holds it as an asset; the strength of demand for the site's current use in comparison to others; how offers received compare to the owner's perception of the value of the site, which in turn is influenced by prices achieved by other sites. Given the lack of a single threshold land value, it is difficult for policy makers to determine the minimum land value that sites should achieve. This will ultimately be a matter of judgement for each planning authority.
2.14 Respondents to consultations on planning policy documents in other authorities in London have made various references to the RICS Guidance on 'Viability in Planning' and have suggested that councils should run their analysis on market values. This would be an extremely misleading measure against which to test viability, as market values should reflect existing policies already in place, and would consequently tell us nothing as to how future (as yet un-adopted) policies might impact on viability. It has been widely accepted elsewhere that market values are inappropriate for testing planning policy requirements.
2.15 Relying upon historic transactions is a fundamentally flawed approach, as offers for these sites will have been framed in the context of current planning policy requirements, so an exercise using these transactions as a benchmark would tell the Council nothing about the potential for sites to absorb as yet unadopted policies. Various Local Plan inspectors and CIL examiners have accepted the key point that Local Plan policies and CIL will ultimately result in a reduction in land values, so

[^7]benchmarks must consider a reasonable minimum threshold which landowners will accept. For local authority areas such as Westminster, where the vast majority of sites are previously developed, the 'bottom line' in terms of land value will be the value of the site in its existing use. This fundamental point is recognised by the RICS at paragraph 3.4.4. of their Guidance Note on 'Financial Viability in Planning":
"For a development to be financially viable, any uplift from current use value to residual land value that arises when planning permission is granted should be able to meet the cost of planning obligations while ensuring an appropriate Site Value for the landowner and a market risk adjusted return to the developer in delivering that project (the NPPF refers to this as 'competitive returns' respectively). The return to the landowner will be in the form of a land value in excess of current use value".
2.16 The Guidance goes on to state that "it would be inappropriate to assume an uplift based on set percentages ... given the diversity of individual development sites".
2.17 Commentators also make reference to 'market testing' of benchmark land values. This is another variant of the benchmarking advocated by respondents outlined at paragraph 2.14. These respondents advocate using benchmarks that are based on the prices that sites have been bought and sold for. There are significant weaknesses in this approach which none of the respondents who advocate this have addressed. In brief, prices paid for sites are a highly unreliable indicator of their actual value, due to the following reasons:

- Transactions are often based on bids that 'take a view' on squeezing planning policy requirements below target levels. This results in prices paid being too high to allow for policy targets to be met. If these transactions are used to 'market test' CIL rates, the outcome would be unreliable and potentially highly misleading.
- Historic transactions of housing sites are often based on the receipt of grant funding, which is no longer available in most cases.
- There would be a need to determine whether the developer who built out the comparator sites actually achieved a profit at the equivalent level to the profit adopted in the viability testing. If the developer achieved a sub-optimal level of profit, then any benchmarking using these transactions would produce unreliable and misleading results.
- Developers often build assumptions of growth in sales values into their appraisals, which provides a higher gross development value than would actually be achieved today. Given that our appraisals are based on current values, using prices paid would result in an inconsistent comparison (i.e. current values against the developer's assumed future values). Using these transactions would produce unreliable and misleading results.
2.18 These issues are evident from a recent BNP Paribas Real Estate review of evidence submitted in viability assessments where the differences between the value ascribed to developments by applicants and the amounts the sites were purchased for by the same parties. The prices paid exceeded the value of the consented schemes by between $52 \%$ and $1,300 \%$, as shown in Figure 2.18.1. This chart compares the residual value of four central London development proposals to the sites' existing use values and the price which the developers paid to acquire the sites (all the data is on a per unit basis).

Figure 2.18.1: Comparison of scheme residual value to existing use value and price paid for site

2.19 For the reasons set out above, the approach of using current use values is a more reliable indicator of viability than using market values or prices paid for sites, as advocated by certain observers. Our assessment follows this approach, as set out in Section 3.
2.20 The NPPG indicates that planning authorities should adopt benchmark land values based on existing use values. It then goes on to suggest that the premium above existing use value should be informed by land transactions. This would in effect simply level benchmark land values up to market value, with all the issues associated with this (as outlined above). The NPPG does temper this approach by indicating that "the landowner premium should be tested and balanced against emerging policies" and that "the premium should provide a reasonable incentive for a land owner to bring forward land for development while allowing a sufficient contribution to comply with policy requirements". The guidance also stresses in several places that "price paid for land" should not be reflected in viability assessments. This would exclude use of transactional data thus addressing the issues highlighted in paragraphs 2.17 and 2.18.

## 3 Appraisal assumptions

3.1 We have appraised 176 development proposals on sites across the city to represent the types of sites that the Council expects to come forward over the Plan period. The development typologies are identified in Appendix 1. 156 of the developments are based on submitted applications and the remaining 20 are hypothetical development scenarios to test single uses ${ }^{14}$.

Table 3.1.1: Development proxies

| Primary use | Actual planning <br> applications | Hypothetical <br> proxies | Total |
| :--- | ---: | ---: | ---: |
| Residential | 75 | 6 | 81 |
| Retail | 24 | 8 | 32 |
| Office | 26 | 6 | 32 |
| Strategic sites | 8 | - | 8 |
| Casino | 3 | - | 3 |
| D1 | 1 | - | 1 |
| Hotel | 16 | - | 16 |
| Nightclub | 3 | - | $\mathbf{3}$ |
| Totals | $\mathbf{1 5 6}$ | $\mathbf{2 0}$ | $\mathbf{1 7 6}$ |

## Residential sales values

3.2 The nature of the residential market in Westminster has been explained earlier. "Core" residential values in Westminster reflect national trends in recent years but do of course vary between different sub-markets. We have considered comparable evidence of both transacted properties in the area and properties currently on the market to establish appropriate values for testing purposes. This exercise indicates that developments in Westminster will attract average sales values ranging from circa just under $£ 11,000$ per square metre to $£ 31,000$ per square metre in the highest value part of the prime area (see Table 3.8.1).

Table 3.8.1: Average sales values used in appraisals

| Area | Average values <br> £s per sq ft |  |
| :--- | :---: | :---: |
| Average values $£ \mathrm{~s}$ <br> per sq m |  |  |
| Prime <br> (Mayfair, Knightsbridge, Belgravia, Whitehall, <br> Covent Garden, Strand, St John's Wood) | $£ 2,080$ | $£ 22,400$ |
| Core <br> (Soho, Fitzrovia, Pimlico, Westbourne Grove, <br> Paddington, Bayswater, Marylebone, Victoria) | $£ 1,465$ | $£ 15,750$ |
| Fringe <br> (Lisson Grove, Church Street, Queens Park, <br> Churchill) | $£ 1,022$ | $£ 11,000$ |

3.3 As noted earlier in the report, Strutt \& Parker predict that sales values in Prime London markets will increase by circa $18 \%$ over the five years 2018 to 2022. To test the impact of the potential increase in sales values, we have modelled a sensitivity analysis with an increase in prices of 10\%, alongside construction inflation of $5 \%$ to provide the Council with an indication of the impact of changes in costs and values on viability.

[^8]3.4 Residential values in the area reflect national trends in recent years but do of course vary between different sub-markets, as noted in Section 2. We have considered comparable evidence of new build schemes in the borough to establish appropriate values for each scheme for testing purposes. This exercise indicates that the developments in the sample will attract average sales values ranging from circa $£ 11,000$ per square metre ( $£ 1,022$ per square foot) to $£ 22,400$ per square metre ( $£ 2,080$ per square foot). The highest sales values are achieved in Mayfair, Knightsbridge and Belgravia. Developments in parts of the north of the borough (Lisson Grove, Church Street and Queens Park) are lowest.
3.5 We have tested the impact of the provision of private units as rented by discounting the market value for these units by $20 \%$, which reflects the discount we have seen on live developments when units are provided as Private Rented Sector stock. As noted in Section 2, this discount is offset to a degree by a reduction in profit margin of circa $5 \%$, so the net reduction in value is $15 \%$.

## Affordable housing tenure and values

3.6 Draft Policy 9 requires schemes capable of providing 10 or more units, or more than 1,000 square metres of floorspace or which have a site area of 0.5 ha or more to provide $35 \%$ affordable housing with a tenure mix of $40 \%$ social or affordable rent and $60 \%$ intermediate. The policy is applied to the gross floor area. We have assumed that the rented housing is provided as social rent with a capital value of $£ 1,925$ per square metre. The rents assumed are based on the MHCLG formulae for target rents, as summarised in Table 3.6.1.

Table 3.6.1: Social rents (per week)

|  | Rent type | 1 bed | 2 bed | 3 bed |  | 4 bed |
| :--- | ---: | ---: | ---: | ---: | :---: | :---: |
| Social rents | $£ 113.77$ | $£ 136.86$ | $£ 157.25$ | $£ 166.37$ |  |  |

3.7 In the July 2015 Budget, the Chancellor announced that Registered Providers ('RPs') will be required to reduce rents by $1 \%$ per annum for the following four years. This will reduce the capital values that RPs will pay developers for completed affordable housing units. From 2019/20 onwards, RPs will be permitted to increase rents by CPI plus $1 \%$ per annum. Given that rents will be increasing by CPI plus $1 \%$ by the time the new Local Plan will be in place, we have applied this assumption to our appraisals.
3.8 As noted in Section 1.30, the Council is seeking to target households on a range of incomes to purchase or rent intermediate housing, as follows:

- $30 \%$ of households on incomes up to lower quartile;
- $25 \%$ of households on incomes between lower quartile to median;
- $25 \%$ of households on incomes between median to upper quartile;
- $20 \%$ of households on incomes between upper quartile and GLA upper income level for intermediate housing (currently $£ 90,000$ per annum).

For the purposes of assessing the capital values generated for intermediate housing, we have assumed that the qualifying incomes for the four bands are as follows:

- Lower quartile: $£ 22,500$
- Median quartile: $£ 45,000$
- Upper quartile: $£ 67,500$
- GLA upper income level: $£ 90,000$

Based on the Council's preferred mix ( $60 \%$ one beds and $40 \%$ two beds) and income thresholds above, the shared ownership units generate a blended capital value of $£ 3,710$ per square metre.
3.9 The CLG/HCA ‘Shared Ownership and Affordable Homes Programme 2016-2021: Prospectus' document clearly states that Registered Providers will not receive grant funding for any affordable housing provided through planning obligations on developer-led developments. Consequently, all our appraisals which we rely upon for testing potential CIL rates assume nil grant. Clearly if grant

## BNP PARIBAS REAL ESTATE

funding does become available over the plan period, it should facilitate an increase in the provision of affordable housing when developments come forward.

Rents and yields for commercial development
3.10 Our assumptions on rents and yields for the retail, office and industrial floorspace are summarised in Table 3.10.1. These assumptions are informed by lettings of similar floorspace in the area over the past eighteen months ${ }^{15}$. Our appraisals assume a 12-month rent-free period for all commercial floorspace to reflect the incentives offered by developers in negotiation with tenants.

Table 3.10.1: Commercial rents (£s per square metre) and yields

| Use | Prime <br> rent | Prime <br> yield | Core <br> rent | Core <br> yield | Fringe <br> rent | Fringe <br> yield |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Retail | 1,887 | $3.00 \%$ | 779 | $4.00 \%$ | 492 | $5.00 \%$ |
| Office | 942 | $3.50 \%$ | 746 | $3.50 \%$ | 595 | $4.00 \%$ |
| B2/B8 | 175 | $6.00 \%$ | 175 | $6.00 \%$ | 175 | $6.00 \%$ |
| C1 | 700 | $4.50 \%$ | 600 | $4.75 \%$ | 425 | $5.00 \%$ |
| C2 | 250 | $5.00 \%$ | 250 | $5.00 \%$ | 250 | $5.00 \%$ |
| D1/D2 | 300 | $6.50 \%$ | 250 | $6.50 \%$ | 250 | $6.50 \%$ |

## Build costs

3.11 We have sourced build costs from the RICS Building Cost Information Service (BCIS), which is based on tenders for actual schemes. Base costs (adjusted for local circumstances by reference to BICS multiplier) are as follows:

Table 3.11.1: Build costs before external works and sustainability allowances

| Development type | Cost per square <br> metre | Cost per square <br> foot |
| :--- | :--- | :--- |
| Retail | $£ 2,096$ | $£ 195$ |
| Offices | $£ 2,448$ | $£ 227$ |
| B2 | $£ 1,237$ | $£ 115$ |
| B8 | $£ 1,237$ | $£ 115$ |
| Hotels | $£ 2,879$ | $£ 267$ |
| D1/D2 | $£ 1,600$ | $£ 149$ |
| Residential | $£ 2,946-£ 3,388$ | $£ 274-£ 315$ |

3.12 In addition, the base costs above are increased by 15\% to account for external works (including car parking spaces) and $6 \%$ for the costs of meeting the energy requirements now embedded into Part L of the Building Regulations.

## Zero carbon and BREEAM

3.13 The 'Greater London Authority Housing Standards Review: Viability Assessment' estimates that the cost of achieving zero carbon standards is $1.4 \%$ of base build costs. We have applied this uplift in costs to the base build costs outlined above to reflect the requirements of draft London Plan policy S12 c.

[^9]3.14 For commercial developments, we have increased base build costs by $2 \%$ to allow for the extra-over costs of achieving BREEAM 'excellent' standard ${ }^{16}$. This is assumed to also address the 'excellent;' standard in relation to water efficiency, for which no clear data is available.

## Accessibility standards

3.15 Our appraisals assume that all units are constructed to meet wheelchair accessibility standards (Category 2 ) apply to all dwellings at an average cost of $£ 924$ per unit. In addition, we have assumed that Category 3 standard applies to $10 \%$ of dwellings at a cost of $£ 7,908$ per unit ${ }^{17}$. These costs address both parts $A$ and $B$ of the requirements (i.e. that the communal areas are designed and fitted out to allow wheelchair access and also that the dwellings themselves are designed and fitted out to facilitate occupation by wheelchair users).

## Professional fees

3.16 In addition to base build costs, schemes will incur professional fees, covering design and valuation, highways consultants and so on. Our appraisals incorporate a 10\% allowance, which is at the middle to higher end of the range for most schemes.

## Development finance

3.17 Our appraisals assume that development finance can be secured at a rate of $6 \%$, inclusive of arrangement and exit fees, reflective of current funding conditions.

## Marketing costs

3.18 Our appraisals incorporate an allowance of 3\% for marketing costs, which includes show homes and agents' fees, plus $0.2 \%$ for sales legal fees.

## Mayoral CIL

3.19 Mayoral CIL is payable on most developments that receive planning consent from 1 April 2012 onwards. Westminster falls within Zone 1, where a CIL of $£ 50$ per square metre (before indexation) is levied. The Mayoral CIL takes precedence over Borough requirements, including affordable housing. Our appraisals take into account Mayoral CIL.
3.20 The Mayor has recently issued a consultation on amendments to the CIL which will (if adopted) increase the rate in Westminster to $£ 80$ per square metre. In the parts of the borough within the Central Activities Zone, the Mayor is proposing to charge $£ 185$ per square metre on offices, $£ 165$ per square metre on retail and $£ 140$ per square metre on hotels. We have applied these increased rates in our appraisals. The proposed Mayoral CIL rates passed examination in September 2018 and will be effective as of 1 April 2019. The Council would need to consider any potential impact of this change in Mayoral CIL rates on its own rates. We have applied the new Mayoral CIL rates in our appraisals.

## Westminster CIL

3.21 As previously noted, the Council approved its CIL Charging Schedule on 20 January 2016 and it came into effect on 1 May 2016. Table 3.21.1 below summarises the prevailing rates of CIL (the indexed rates are shown in italics ${ }^{18}$ ). For residential developments (covering all C use classes) in the Prime zone, the adopted rate is $£ 550$ per square metre. In the Core zone, the adopted rate is $£ 400$ per square metre; and in the Fringe zone the adopted rate is $£ 200$ per square metre. CIL rates for commercial development (offices, hotels, nightclubs, casinos and retail) are £200, £150 and £50

[^10]per square metre in the Prime, Core and Fringe zones respectively. All other uses attract a nil rate.
Table 3.21.1: CIL rates per net additional square metre in the Charging Schedule (indexed rates shown in italics)

| Development type | Prime | Core | Fringe |
| :---: | :---: | :---: | :---: |
| Residential (all C uses) | $\begin{gathered} £ 550 \\ (£ 637) \end{gathered}$ | $\begin{gathered} £ 400 \\ (£ 464) \end{gathered}$ | $\begin{gathered} £ 200 \\ (£ 232) \end{gathered}$ |
| Commercial (offices, hotels, nightclubs, casinos, retail) | $\begin{aligned} & £ 200 \\ & (£ 232) \end{aligned}$ | $\begin{aligned} & £ 150 \\ & (£ 174) \end{aligned}$ | $\begin{aligned} & £ 50 \\ & (£ 58) \end{aligned}$ |
| All other uses | Nil |  |  |

3.22 The amended CIL Regulations specify that if any part of an existing building is in lawful use for 6 months within the 36 months prior to the time at which planning permission first permits development, all of the existing floorspace will be deducted when determining the amount of chargeable floorspace. This is likely to be the case for many development sites in Westminster but not all existing floorspace will qualify. Therefore, for the purposes of our appraisals, we have assumed that there is no deduction for existing floorspace to ensure that the proposed CIL rate is viable for developments where there is no qualifying existing floorspace to net off.

## Commercial contribution towards affordable housing ${ }^{19}$

3.23 As noted in Section 1, small scale hotels and offices in the CAZ comprising 750 to 999 square metres ${ }^{20}$ will be required to make a financial contribution towards the provision of affordable housing, as follows:

■ Prime: $£ 18,491$

- Core: $£ 12,450$
- Fringe: $£ 8,134$
3.24 The payment is calculated on the net increase in floorspace (i.e. the proposed floorspace in the application scheme less any existing floorspace). So on a scheme of 1,999 square metres in the Core zone with an existing floorspace of 1,000 square metres, the financial contribution would be $£ 4,357,000$ ( $35 \%$ of 999 square metres $=350$ square metres, multiplied by $£ 12,450$ per square metre). We have also tested additional thresholds of 1,500 and 2,000 square metres.

Table 3.24: Schemes under 1,000 square metres additional floorspace threshold

| Type of uses | Existing <br> floorspace square <br> metres | Proposed <br> floorspace square <br> metres | Net additional <br> floorspace |
| :--- | :---: | :---: | :---: |
| Proxy 1 - small office scheme - PIL | 1,000 | 1,999 | 999 |
| Proxy 2 - small office scheme - PIL | 1,000 | 2,500 | 1,500 |
| Proxy 3 - small office scheme - PIL | 1,000 | 3,000 | 2,000 |
| Proxy 16 - small hotel scheme - PIL | 1,000 | 1,999 | 999 |
| Proxy 17 - small hotel scheme - PIL | 1,000 | 2,500 | 1,500 |
| Proxy 18 - small hotel scheme - PIL | 1,000 | 3,000 | 2,000 |

[^11]3.25 Larger hotel and office developments (1,000 square metres or more) within the CAZ are required to provide $35 \%$ affordable housing on-site. Developments would not be required to provide private housing. So a scheme providing 2,000 square metres in total would need to provide $35 \%$ of the uplift in floorspace as affordable. If the existing floorspace is 1,000 , the scheme would provide 1,000 square metres of net additional space, of which 350 square metres ( $35 \%$ ) would need to be provided as affordable housing. We have also tested the policy requirement at $15 \%, 20 \%, 25 \%$ and $30 \%$ of net additional floorspace.

Table 3.2.5: Schemes over 1,000 square metre threshold (on- site affordable housing)

| Type of uses | Existing Floor space square metres | Proposed Floor space square metres | Net additional floor space square metres | $\begin{aligned} & \text { 15\% } \\ & \text { Aff Hsg } \end{aligned}$ | $20 \%$ <br> Aff <br> Hsg | $\begin{aligned} & \text { 25\% } \\ & \text { Aff } \\ & \text { Hsg } \end{aligned}$ | 30\% <br> Aff Hsg | $\begin{aligned} & 35 \% \\ & \text { Aff } \\ & \text { Hsg } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Proxy 4 - <br> office - on- <br> site <br> affordable | 1,000 | 2,000 | 1,000 | 150 | 200 | 250 | 300 | 350 |
| Proxy 5 office - onsite affordable | 1,000 | 2,500 | 1,500 | 225 | 300 | 375 | 450 | 525 |
| Proxy 6 office - onsite affordable | 1,000 | 3,000 | 2,000 | 300 | 400 | 500 | 600 | 700 |
| Proxy 7 - <br> office - on- <br> site <br> affordable | 1,000 | 3,500 | 2,500 | 375 | 500 | 625 | 750 | 875 |
| Proxy 8 office - onsite affordable | 10,000 | 30,000 | 20,000 | 3,000 | 4,000 | 5,000 | 6,000 | 7,000 |
| Proxy 9 office - onsite affordable | 15,000 | 45,000 | 30,000 | 4,500 | 6,000 | 7,500 | 9,000 | 10,500 |
| Proxy 19 hotel - on-site affordable | 1,000 | 2,000 | 1,000 | 150 | 200 | 250 | 300 | 350 |
| Proxy 20 hotel - on-site affordable | 1,000 | 2,500 | 1,500 | 225 | 300 | 375 | 450 | 525 |
| Proxy 21 hotel - on-site affordable | 1,000 | 3,000 | 2,000 | 300 | 400 | 500 | 600 | 700 |
| Proxy 22 hotel - on-site affordable | 1,000 | 3,500 | 2,500 | 375 | 500 | 625 | 750 | 875 |
| Proxy 23 hotel - on-site affordable | 10,000 | 30,000 | 20,000 | 3,000 | 4,000 | 5,000 | 6,000 | 7,000 |
| Proxy 24 hotel - on-site affordable | 15,000 | 45,000 | 30,000 | 4,500 | 6,000 | 7,500 | 9,000 | 10,500 |

3.26 The emerging mixed-use policy also gives the option of provision of affordable housing off-site through a payment in lieu. This is based on $35 \%$ of the net additional floorspace multiplied by the relevant amount per square metre at paragraph 3.23.

## Section 106 costs

3.27 To account for residual Section 106 requirements, we have included an allowance of $£ 20$ per square metre for all types of development. The actual amounts will of course be subject to site-specific negotiations when schemes are brought forward through the development management process. This accords with the Council's evidence of sums sought on planning applications in Westminster, when items that do not satisfy the three tests identified by Regulation 122 and the other restrictions on use of planning obligations under the CIL Regulations are excluded.

## Employment and training contributions

3.28 The Council indicates that the requirements of policy 30 (Policy 18 in the Regulation19 version of the plan) for financial contributions towards employment and training will amount to $£ 5.18$ per square metre of commercial floorspace and $£ 3.90$ per square metre of residential floorspace. We have incorporated these amounts into our appraisals as additional Section 106 contributions (in addition to the $£ 20$ per square metre noted in paragraph 3.25.

## Electric car charging points

3.29 The cost of a KEBA P30 b-series 3 Phase Type 2 charging point is currently $£ 1001.40$ plus stainless steel pedestal at $£ 390.93^{21}$. In addition, we have assumed $£ 500$ per charging point for extra over costs and fitting. The total cost per charging point is therefore $£ 1,982.33$. Our appraisals assume that $50 \%$ of units will be provided with access to an electric charging point.

## Student housing - affordable student housing provision

3.30 Policy 12 (Policy 11 in the Regulation 19 version of the plan) requires that student housing schemes are let at rents that are at a level considered to be affordable to a student living away from home. By definition, all rents are affordable as markets are self-regulating (if pricing is too high, demand will fall and the price will need to be adjusted downwards). The new draft London Plan policy H17 A4 requires that student housing makes provision for affordable student accommodation, which is defined as no more than $55 \%$ of the annual maintenance loan available to students living away from home in London. This currently equates to $£ 155$ per week.

## Development and sales periods

3.31 Development and sales periods vary between type of scheme. However, our sales periods are based on an assumption of a sales rate of 6 units per month, with an element of off-plan sales reflected in the timing of receipts. This is reflective of current market conditions, whereas in improved markets, a sales rate of up to 8 units per month might be expected. We also note that many schemes in London have sold entirely off-plan, in some cases well in advance of completion of construction. Clearly markets are cyclical and sales periods will vary over the economic cycle and the extent to which units are sold off-plan will vary over time. Our programme assumptions assume that units are sold over varying periods after completion, which is a conservative approach that ensures that the outcomes of the appraisals are relatively conservative.

## Developer's profit

3.32 Developer's profit is closely correlated with the perceived risk of residential development. The greater the risk, the greater the required profit level, which helps to mitigate against the risk, but also to ensure that the potential rewards are sufficiently attractive for a bank and other equity providers to fund a scheme. In 2007, profit levels were at around 13-15\% of GDV. However, following the

[^12]impact of the credit crunch and the collapse in interbank lending and the various government bailouts of the banking sector, profit margins have increased. It is important to emphasise that the level of minimum profit is not necessarily determined by developers (although they will have their own view and the Boards of the major housebuilders will set targets for minimum profit).
3.33 The views of the banks which fund development are more important; if the banks decline an application by a developer to borrow to fund a development, it is very unlikely to proceed, as developers rarely carry sufficient cash to fund it themselves. Consequently, future movements in profit levels will largely be determined by the attitudes of the banks towards development proposals.
3.34 The near collapse of the global banking system in the final quarter of 2008 is resulting in a much tighter regulatory system, with UK banks having to take a much more cautious approach to all lending. In this context, and against the backdrop of the current sovereign debt crisis in the Eurozone, the banks were for a time reluctant to allow profit levels to decrease. However, perceived risk in the in the UK housing market is receding, albeit there is a degree of caution in prime central London markets as a consequence of the outcome of the referendum on the UK's membership of the EU. We have therefore adopted a profit margin of $18 \%$ of private GDV for testing purposes, although individual schemes may require lower or higher profits, depending on site specific circumstances.
3.35 Our assumed return on the affordable housing GDV is $6 \%$. A lower return on the affordable housing is appropriate as there is very limited sales risk on these units for the developer; there is often a presale of the units to an RP prior to commencement. Any risk associated with take up of intermediate housing is borne by the acquiring RP, not by the developer. A reduced profit level on the affordable housing reflects the GLA 'Development Control Toolkit' guidance (February 2014) and Homes and Communities Agency's guidelines in its Development Appraisal Tool (August 2013).

## Exceptional costs

Exceptional costs can be an issue for development viability on previously developed land. These costs relate to works that are 'atypical' and that are over and above standard build costs. However, in the absence of details of site investigations, it is not possible to provide a reliable estimate of what exceptional costs might be. Our analysis therefore excludes exceptional costs, as to apply a blanket allowance would generate misleading results. An 'average' level of costs for abnormal ground conditions and some other 'abnormal' costs is already reflected in BCIS data, as such costs are frequently encountered on sites that form the basis of the BCIS data sample.

## Benchmark land value

3.37 Benchmark land value, based on the existing use value of sites is a key consideration in the assessment of development economics for testing planning policies and tariffs. Clearly, there is a point where the Residual Land Value (what the landowner receives from a developer) that results from a scheme may be less than the land's existing use value. Existing use values can vary significantly, depending on the demand for the type of building relative to other areas. Similarly, subject to planning permission, the potential development site may be capable of being used in different ways - as a hotel rather than residential for example; or at least a different mix of uses. Existing use value is effectively the 'bottom line' in a financial sense and therefore a key factor in this study.
3.38 We have based the current use value for each site on the actual floorspace on the site at the time planning applications were submitted. For the 20 hypothetical developments, we have assumed that the new development will result in an intensification of development, with a lesser volume of space on site than will be developed. Our rent and yield assumptions for the existing floorspace are summarised in Table 3.35.1. These assumptions are based on the lower quartile of lettings in Westminster over the past 18 months, therefore reflecting poorer quality stock which is more likely to be redeveloped than stock which attracts higher rents.

Table 3.35.1: Rents and yields for existing floorspace

| Use | Prime rent | Prime yield | Core rent | Core yield | Fringe rent | Fringe yield |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Retail | £500 | 5.50\% | £400 | 6.25\% | £175 | 6.50\% |
| Office | £550 | 5.50\% | £450 | 5.75\% | £350 | 6.25\% |
| B2/B8 | £110 | 8.00\% | £110 | 8.00\% | £110 | 8.00\% |
| C1 | £300 | 6.00\% | £275 | 6.00\% | £250 | 6.00\% |
| C2 | £175 | 6.00\% | £140 | 6.00\% | £140 | 6.00\% |
| D1/D2 | £150 | 8.00\% | £120 | 8.00\% | £120 | 8.00\% |

3.39 Redevelopment proposals that generate residual land values below current use values are - in most straightforward commercial situations - unlikely to be delivered. While any such thresholds are only a guide in 'normal' development circumstances, it does not imply that individual landowners, in particular financial circumstances, will not bring sites forward at a lower return or indeed require a higher return. If proven current use value justifies a higher benchmark than those assumed, then appropriate adjustments may be necessary. As such, current use values should be regarded as benchmarks to underpin an area-wide assessment of viability rather than definitive fixed variables on a site by site basis.
3.40 It is also necessary to recognise that a landowner will require an additional incentive to release the site for development. The premium above current use value would be reflective of specific site circumstances (the primary factors being the occupancy level and strength of demand from alternative occupiers). For policy testing purposes it is not possible to reflect the circumstances of each individual site, so a blanket assumption of a $20 \%$ premium has been included to reflect the 'average' situation. This level of return is competitive when compared to other forms of investment.
3.41 While landowners may have expectations beyond a premium of $20 \%$, the NPPG notes that landowners will need to make adjustments to their expectations to reflect the reasonable expectation on the part of the community that development in their area will be able to contribute towards local infrastructure and affordable housing requirements. If landowners fail to recognise and reflect this reasonable expectation, it is likely that sites will need to remain in their existing use.

## 4 Appraisal outputs

4.1 The full inputs to and outputs from our appraisals of the various developments are set out in Section 6 and appendices 2 to 4 . We have appraised 176 developments, reflecting different densities and types of development across the city. These typologies include non-residential uses, including offices, hotels and retail floorspace.
4.2 Each appraisal incorporates (where relevant) $35 \%$ affordable housing in line with Policy 9. The affordable housing is assumed to be provided as $40 \%$ rent (at social and affordable rents) and $60 \%$ intermediate housing (affordable to households on four income thresholds as noted in Section 2). We have also tested the schemes with $30 \%, 25 \%$ and $20 \%$ affordable housing.
4.3 For each development typology, we have applied a sales value reflecting the value typically found within the area the site is located. Where the residual land value of a typology exceeds the benchmark land value, the scheme can absorb the policy requirements sought by the Council. Conversely, if the residual land value is lower than the benchmark land value, the scheme cannot viably absorb the full extent of policy requirements.
4.4 Finally, all the scenarios are tested with sales value growth of $10 \%$ and $5 \%$ inflation on costs to provide an indication of the impact of medium term growth.

## 5 Assessment of appraisal results

5.1 This section sets out the results of our appraisals with the residual land values calculated for scenarios with sales values and capital values reflective of market conditions across the city. We have tested the impact of emerging plan policies to assist the Council in its decision making on potential options. All the appraisals include Mayoral CIL (at the proposed rates in the MCIL2 draft Charging Schedule) and Westminster's rates, indexed to current levels. There are other policies in the London Plan and the Council's draft plan that are embedded in base development costs, as noted in Section 1.

## Affordable housing (Policy 9)

5.2 As noted in Section 4.2, we have tested the schemes with $35 \%$ affordable (40\% social rent and $60 \%$ intermediate) and also $30 \%, 25 \%$ and $20 \%$ affordable housing with the same $40 \% / 60 \%$ tenure split. The full results, showing the residual land values for each scheme compared to each site's existing use value, are attached as Appendix 2.
5.3 Not all schemes will be viable at any given level of affordable housing, particularly in complex urban areas such as Westminster where virtually all schemes will involve a degree of recycling of existing buildings (either through demolition or refurbishment and conversion). The appraisals demonstrate the degree to which varying the affordable housing policy below the emerging target of $35 \%$ would actually improve viability. Table 5.3.1 summarises the results in terms of 'viable' and 'non-viable' schemes at the varying affordable housing levels. We also show the results reflecting growth in sales values of $10 \%$ and inflation on costs at $5 \%$.

Table 5.3.1: Appraisal results - viable and non-viable schemes based on gross floorspace (present day values)

| Affordable housing <br> percentage | Sustainability <br> requirements |  | Viable <br> schemes |
| :--- | :--- | :--- | :--- |
| $35 \%$ | Off | Viable schemes as \% of schemes required <br> to provide $\mathbf{A H}$ |  |
| $30 \%$ | Off | 48 | $56 \%$ |
| $25 \%$ | Off | 52 | $56 \%$ |
| $20 \%$ | Off | 56 | $61 \%$ |
| $35 \%$ | On | 47 | $66 \%$ |
| $30 \%$ | On | 48 | $55 \%$ |
| $25 \%$ | On | 49 | $56 \%$ |
| $20 \%$ | On | 52 | $58 \%$ |

Table 5.3.2: Appraisal results - viable and non-viable schemes based on gross floorspace (10\% value growth and 5\% cost inflation)

| Affordable housing <br> percentage | Sustainability <br> requirements | Viable <br> schemes | Viable schemes as \% of schemes <br> required to provide AH |  |
| :--- | :--- | :--- | :--- | :---: |
| $35 \%$ | Off | 51 | $60 \%$ |  |
| $30 \%$ | Off | 53 | $62 \%$ |  |
| $25 \%$ | Off | 57 | $67 \%$ |  |
| $20 \%$ | Off | 60 | $71 \%$ |  |
| $35 \%$ | On | 50 | $59 \%$ |  |
| $30 \%$ | On | 52 | $61 \%$ |  |
| $25 \%$ | On | 53 | $62 \%$ |  |
| $20 \%$ | On | 57 | $67 \%$ |  |

5.4 As can be noted in Table 5.3.1, the Council would gain little in terms of increasing the number of viable schemes by reducing its affordable housing below the proposed $35 \%$ in the draft plan. For example, a $30 \%$ target would not result in an increase in the number of viable schemes. The results also indicate that the application of sustainability requirements in policies 32, 33 and 36 (Policies 33, 36 and 37 in the Regulation 19 version of the plan) has little bearing on the viability of developments in the city.

## Commercial contributions towards affordable housing (Policy 9 (Policy 10 in the Regulation19

 version of the plan))5.5 Policy 9 (Policy 10 in the Regulation 19 version of the plan) requires that commercial schemes in the CAZ contribute towards affordable housing, either on site or through a payment in lieu depending on the size of the scheme. As noted in paragraphs 3.23 to 3.26 , we have tested 15 proxies for office developments and 15 proxies for hotel developments.
5.6 Proxies 1 (offices) and 16 (hotels) test the viability of the emerging requirement for a payment in lieu on small sites, where net additional floorspace is up to 999 square metres. Proxies 2, 3, 17 and 18 test higher thresholds of 1,500 and 2,000 square metres for both offices and hotels. The results are summarised in Table 5.6.1. These indicate that the requirement for a payment in lieu on office schemes will not affect viability, with significant surpluses generated above benchmark land values. However, the viability of hotel schemes is more marginal and the requirement for a payment in lieu will make developments unviable if it is increased above $15 \%$ of net additional floorspace.

Table 5.6.1: Payment in lieu on commercial schemes (net additional floorspace of 999 square metres)

| Development type | Existing floor space | Proposed floor space | Net additional floor space | BLV £ millions | Residual land values (£ millions) / affordable housing percentage |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | 15\% | 20\% | 25\% | 30\% | 35\% |
| Proxy 1 small office scheme | 1,000 | 1,999 | 999 | $£ 6.02$ | $£ 11.60$ | $£ 11.04$ | $£ 10.47$ | £9.91 | $£ 9.34$ |
| Proxy 2 small office scheme | 1,000 | 2,500 | 1,500 | $£ 6.02$ | £14.09 | $£ 13.24$ | $£ 12.39$ | $£ 11.54$ | $£ 10.69$ |
| Proxy 3 small office scheme | 1,000 | 3,000 | 2,000 | $£ 6.02$ | $£ 17.32$ | $£ 16.18$ | $£ 15.05$ | $£ 13.91$ | $£ 12.78$ |
| Proxy 16 small hotel scheme | 1,000 | 1,999 | 999 | $£ 2.41$ | $£ 2.43$ | $£ 1.86$ | £1.30 | $£ 0.73$ | $£ 0.16$ |
| Proxy 17 small hotel scheme | 1,000 | 2,500 | 1,500 | $£ 2.41$ | £2.61 | $£ 1.76$ | £0.91 | $£ 0.06$ | -£0.80 |
| Proxy 18 small hotel scheme | 1,000 | 3,000 | 2,000 | $£ 2.41$ | £2.80 | $£ 1.66$ | $£ 0.53$ | -£0.62 | -£1.77 |

5.7 For hotel and office developments above 1,000 square metres of net additional floorspace, the Council is intending to seek $35 \%$ on-site affordable housing. The amount of floorspace required is based on $35 \%$ of the net additional floorspace. For example, a scheme providing 2,000 square metres of floorspace on a site with 1,000 square metres of existing space would provide 350 square metres of affordable housing (i.e. $35 \%$ of 1,000 square metres) and 1,650 square metres of commercial floorspace. Proxies 4 to 9 and 19 to 24 test the viability of this policy approach on offices and hotels respectively. The schemes range in scale from 2,000 square metres to 45,000 square metres. The results are summarised in Table 5.7.1, indicating that the policy requirement should not adversely impact on viability with all schemes generating higher residual land values than benchmark land values at $35 \%$ affordable housing.

Table 5.7.1: On-site affordable housing on commercial developments (all floor areas in square metres)

| Developmenttype | Existing floorspace | Proposed floorspace | Net additional floorspace | On-site affordable (square metres) |  |  |  |  | BLV £m | Residual land values ( $£$ millions) / affordable housing percentage |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | 15\% | 20\% | 25\% | 30\% | 35\% |  | 15\% | 20\% | 25\% | 30\% | 35\% |
| Proxy 4 - office | 1,000 | 2,000 | 1,000 | 150 | 200 | 250 | 300 | 350 | £6.02 | $£ 12.28$ | £11.84 | £11.40 | $£ 10.96$ | £10.52 |
| Proxy 5 - office | 1,000 | 2,500 | 1,500 | 225 | 300 | 375 | 450 | 525 | £6.02 | £14.46 | £13.82 | $£ 13.18$ | £12.54 | £11.90 |
| Proxy 6 - office | 1,000 | 3,000 | 2,000 | 300 | 400 | 500 | 600 | 700 | £6.02 | $£ 17.10$ | £16.24 | £15.39 | $£ 14.53$ | £13.68 |
| Proxy 7 - office | 1,000 | 3,500 | 2,500 | 375 | 500 | 625 | 750 | 875 | £6.02 | £20.30 | £19.13 | $£ 17.95$ | £16.78 | $£ 15.61$ |
| Proxy 8 - office | 10,000 | 30,000 | 20,000 | 3,000 | 4,000 | 5,000 | 6,000 | 7,000 | $£ 60.22$ | £177.66 | £168.83 | $£ 160.00$ | £151.16 | £142.33 |
| Proxy 9 - office | 15,000 | 45,000 | 30,000 | 4,500 | 6,000 | 7,500 | 9,000 | 10,500 | $£ 90.33$ | $£ 254.09$ | £240.44 | $£ 226.79$ | £213.13 | £199.48 |
| Proxy 19 - hotel | 1,000 | 2,000 | 1,000 | 150 | 200 | 250 | 300 | 350 | £2.41 | £3.25 | $£ 3.06$ | $£ 2.86$ | $£ 2.66$ | $£ 2.47$ |
| Proxy 20 - hotel | 1,000 | 2,500 | 1,500 | 225 | 300 | 375 | 450 | 525 | £2.41 | $£ 3.92$ | £3.62 | $£ 3.33$ | £3.04 | $£ 2.74$ |
| Proxy 21 - hotel | 1,000 | 3,000 | 2,000 | 300 | 400 | 500 | 600 | 700 | £2.41 | £4.89 | $£ 4.48$ | $£ 4.08$ | £3.67 | £3.26 |
| Proxy 22 - hotel | 1,000 | 3,500 | 2,500 | 375 | 500 | 625 | 750 | 875 | £2.41 | $£ 5.05$ | £4.49 | £3.93 | £3.37 | $£ 2.82$ |
| Proxy 23 - hotel | 10,000 | 30,000 | 20,000 | 3,000 | 4,000 | 5,000 | 6,000 | 7,000 | £24.07 | $£ 41.73$ | £38.05 | $£ 34.37$ | $£ 30.69$ | £27.01 |
| Proxy 24 - hotel | 15,000 | 45,000 | 30,000 | 4,500 | 6,000 | 7,500 | 9,000 | 10,500 | £36.10 | £73.47 | $£ 67.37$ | £61.27 | $£ 55.17$ | $£ 49.07$ |

5.8 Finally, we have tested the option of seeking an off-site financial contribution on commercial schemes providing more than 1,000 square metres of floorspace. For example, a scheme of 2,000 square metres on a site with 1,000 square metres of existing floorspace would make a financial contribution on 350 square metres ( $35 \%$ of the 1,000 net additional square metres). In the Core Zone, this would be charged at $£ 12,450$ per square metre, or a total of $£ 4,357,500$. The results are summarised in Table 5.8.1.

Table 5.8.1: Commercial schemes providing 1,000 square metres net additional floorspace or more with financial contribution towards affordable housing

| Development type | Existing floor space | Proposed floor space | Net addition -al floor space | BLV £ millions | Residual land values ( $£$ millions) / affordable housing percentage |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | 15\% | 20\% | 25\% | 30\% | 35\% |
| Proxy 10 office | 1,000 | 2,000 | 1,000 | $£ 6.02$ | £12.11 | $£ 11.54$ | $£ 10.97$ | $£ 10.41$ | £9.84 |
| Proxy 11 office | 1,000 | 2,500 | 1,500 | $£ 6.02$ | £14.71 | $£ 13.86$ | $£ 13.01$ | $£ 12.16$ | £11.31 |
| $\text { Proxy } 12 \text { - }$ office | 1,000 | 3,000 | 2,000 | $£ 6.02$ | $£ 16.56$ | $£ 15.43$ | $£ 14.29$ | $£ 13.16$ | $£ 12.03$ |
| $\text { Proxy } 13 \text { - }$ office | 1,000 | 3,500 | 2,500 | $£ 6.02$ | £19.04 | $£ 17.62$ | $£ 16.20$ | $£ 14.79$ | $£ 13.37$ |
| Proxy 14 office | 10,000 | 30,000 | 20,000 | $£ 60.22$ | $£ 173.17$ | £161.82 | $£ 150.47$ | $£ 139.12$ | $£ 127.77$ |
| Proxy 15 office | 15,000 | 45,000 | 30,000 | $£ 90.33$ | $£ 237.54$ | $£ 220.57$ | £203.60 | £186.63 | $£ 169.66$ |
| $\text { Proxy } 25 \text { - }$ hotel | 1,000 | 2,000 | 1,000 | £2.41 | £2.31 | $£ 1.74$ | $£ 1.18$ | £0.61 | £0.04 |
| $\begin{aligned} & \text { Proxy } 26 \text { - } \\ & \text { hotel } \end{aligned}$ | 1,000 | 2,500 | 1,500 | £2.41 | £2.61 | $£ 1.76$ | $£ 0.91$ | $£ 0.06$ | -£0.81 |
| $\text { Proxy } 27 \text { - }$ hotel | 1,000 | 3,000 | 2,000 | $£ 2.41$ | £2.62 | $£ 1.49$ | $£ 0.35$ | -£0.79 | -£1.94 |
| $\text { Proxy } 28 \text { - }$ hotel | 1,000 | 3,500 | 2,500 | £2.41 | £2.98 | $£ 1.56$ | £0.14 | -£1.30 | -£2.74 |
| $\begin{aligned} & \text { Proxy } 29 \text { - } \\ & \text { hotel } \end{aligned}$ | 10,000 | 30,000 | 20,000 | $£ 24.07$ | $£ 26.30$ | $£ 14.96$ | $£ 3.62$ | -£7.83 | -£19.33 |
| Proxy 30- hotel | 15,000 | 45,000 | 30,000 | $£ 36.10$ | $£ 42.07$ | $£ 25.05$ | £8.02 | -£9.13 | -£26.40 |

5.9 As can be noted in the table, office developments are able to absorb the financial contribution and generate residual land values exceeding the benchmark land values. However, hotel development is more marginal and residual land values fall below benchmark land values if the financial contribution exceeds $15 \%$ affordable of net additional floorspace.

Sustainability requirements (policies 32, 33 and 36 (Policies 33, 36 and 37 in the Regulation19 version of the plan))
5.10 As noted in Section 3, we have allowed a cumulative allowance of 7.4\% of base build costs for meeting the additional sustainability requirements above Part L of the Building Regulations.

Table 5.10.1: Impact of sustainability requirements

| Affordable housing <br> percentage | Number of viable schemes <br> without sustainability <br> allowance | Number of viable schemes <br> with sustainability <br> allowance | Change <br> resulting from <br> sustainability <br> requirement |
| :--- | :--- | :--- | :--- | :--- |
| $35 \%$ | 45 | 44 | -1 |
| $30 \%$ | 45 | 45 | - |
| $25 \%$ | 49 | 46 | -3 |
| $20 \%$ | 53 | 49 | -4 |

## 6 Conclusions

6.1 The NPPF states that "Plans should set out the contributions expected in association with particular sites and types of 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, green and digital infrastructure). Such policies should not undermine the delivery of the plan". This summary report and its supporting appendices test the ability of development typologies in Westminster to support local plan policies while making contributions to infrastructure that will support growth through CIL.
6.2 We have tested the impact of the main policies which may have an impact on viability:

- Affordable housing: We have appraised residential schemes with $35 \%$ affordable housing in line with draft policy 9 (Policy 10 in the Regulation 19 version of the plan) which seeks to maximise delivery of affordable housing in accordance with London Plan policy $\mathrm{H}^{22}$. The tenure of the affordable housing is assumed to be 40\% rent (tested assuming social rents) and 60\% intermediate, with four tiers of household income levels to ensure units are affordable to a range of those in need of intermediate housing.
- The results of the appraisals show that the Council's policy approach will not have an adverse impact on viability. The results of appraisals with lower levels of affordable housing demonstrate that the gains in terms of 'viable' outcomes are very limited in comparison to the likely losses of affordable housing units that would result from a reduction below $35 \%$. Furthermore, the Council's draft policy indicates that they will have regard to scheme-specific viability issues where these arise in exceptional circumstances.
- Commercial scheme contribution towards affordable housing: The Council's requirement for commercial (office and hotel) schemes to contribute towards affordable housing should be readily absorbed by most office schemes but will need to be applied flexibly on hotel developments.
- Sustainability requirements: the results of our appraisals indicate that sustainability requirements in the draft plan have a modest impact on overall viability and should be readily accommodated in almost all circumstances.
6.3 The Mayor of London has recently consulted on a replacement Charging Schedule (MCIL2) which has significantly increased CIL rates for office, retail and hotel developments in Westminster. These rates have been incorporated into our appraisals (alongside Westminster CIL with indexation). Clearly the imposition of higher Mayoral CIL rates may impact on the ability of the Council to increase its own rates in the future.


## Additional observations

6.4 Viability measured in present value terms is only one of several factors that determine whether a site is developed. Developers need to maintain a throughput of sites to ensure their staff are utilised and they can continue to generate returns for their shareholders. Consequently, small adjustments to residual land values resulting from changes to policy can be absorbed in almost all circumstances by developers taking a commercial view on the impact.
6.5 In considering the outputs of the appraisals, it is important to recognise that some developments will be unviable regardless of the Council's requirements. In these cases, the value of the existing building will be higher than a redevelopment opportunity over the medium term. However, this situation should not be taken as an indication of the viability (or otherwise) of the Council's policies and requirements. In Westminster, almost all sites are in a productive use, whether that be providing employment or housing and there are few sites where development is a critical driver.
6.6 It is critical that developers do not over-pay for sites such that the value generated by developments is

[^13]paid to the landowner, rather than being used to meet policy requirements. The Council should work closely with developers to ensure that landowners' expectations of land value are appropriately framed by the local policy context. There may be instances when viability issues emerge on individual developments, even when the land has been purchased at an appropriate price (e.g. due to abnormal costs). In these cases, some flexibility may be required subject to submission of a robust site-specific viability assessment.

Appendix 1 - Sites details












 $\underbrace{\substack{ \\\hline}}_{\substack{500 \% \\ \text { Resi } \\ \text { R0\% }}}$




Appendix 2 - Appraisal results (present day)

| westun | ter local plan | Vinile end AH requa |  | Commercia A A cont |  | $\underset{\substack{\text { AHt pererenage } \\ \text { Renederecenage }}}{ }$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Development tye | Area | RLV | BLv |  |  | Com PL |
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|  |  | Prime |  |  | － | $\pm$ |  |
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| ${ }_{1}^{14}$ |  | Prine |  |  |  | Noresil Noatrequited |  |
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|  | Residenialio ony onexsing ofitce |  | ${ }_{\text {Etabe }}$ | ${ }_{\text {ctisfora }}$ |  | Noat requred |  |
|  | Residenial ony one exsing eses | frimge |  |  |  | NoAf requid |  |
| ${ }^{21}$ | Residenat ony on exsisigo oter | $\xrightarrow{\text { fringe }}$ | fili， | $\frac{\text { E1．390．651 }}{\text { Etil．}}$ |  |  |  |
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| ${ }_{24}^{24}$ | Residenalu | coie |  |  |  | AHferequied |  |
| ${ }_{26}^{26}$ | Residenia ony on exsing resi | ere | ¢1．0．5．333 | E11．050．188 |  | Noresil |  |
|  | Sentia ony one exsing atice |  |  |  |  |  |  |
| ${ }^{29}$ | Ressemiala oly one exsing ofite | ere |  | E4，585．522 |  | Atreewited |  |
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| ${ }^{36}$ |  | Sore |  |  |  | ${ }^{\text {a }}$ Hefrequiured |  |
| ${ }_{38}$ |  | core |  |  |  |  |  |
| ${ }^{39}$ |  |  | ${ }^{\text {E962，312 }}$ | 2，801，18 |  | Area |  |
| ${ }_{41}^{40}$ | Residenala ony one exsing fes | dime |  |  |  | Noatreuwited |  |
| ${ }_{4}^{42}$ |  | ne |  |  |  | ${ }_{\text {ate }}^{\text {Atrewiured }}$ |  |
| ${ }_{4}^{44}$ |  |  |  |  |  |  |  |
| ${ }^{46}$ | Ressenenila ony one exsing oftice | Pime | 退 | ctic．at：27］ |  | AH reaured |  |
| ${ }_{48}^{48}$ | ${ }_{\text {Heleal }}^{\text {Hed }}$ | e |  |  |  | Noresi |  |
| ${ }_{50}^{49}$ | Residenala ony on ensting ress | me |  |  |  | Noatreatied |  |
| ${ }_{51}^{51}$ | Jenta ony on exssing resi | Pime | ${ }_{\text {E2，} 2 \text { 21，} 2,83}$ | ${ }_{\text {E4，} 69.9 .17}$ | f2，54， 3 ，272 Noonvable | voAH reaui |  |
| ${ }_{5}^{52}$ | Residenialany on ensingiress | ${ }^{\text {ne }}$ |  |  |  | No AH Fewitied |  |
| ${ }_{5}^{54}$ |  | Pime | （e95．088 |  |  |  |  |
| ${ }_{56}^{59}$ | Residenial ony one exsing tes | e |  | coter |  | AHrequied |  |
| ${ }_{58}^{58}$ | Ressemala ony yon lomer holerest |  |  |  | E7，707，705 Noon－wabe | Hrequied |  |
| 59 60 | ${ }^{\text {Resedenail }}$ Ru | 隹 |  |  |  |  |  |
| ${ }_{6}^{62}$ | m |  |  | E696，707］ | E．tata03 vave |  |  |
|  | orice end horel | Pmme |  |  | vable | $\frac{\text { Afreaul }}{\text { Notesi }}$ |  |
| ${ }_{6}^{64}$ |  | Coie | $\underbrace{\substack{\text { ET5，297 }}}_{\text {E48，777．49 }}$ |  |  | $\xrightarrow{\text { Noresil }}$ NoAtrequried |  |
| ${ }_{6} 6$ |  |  |  |  |  | $\xrightarrow{\text { Vorest }}$ Norest |  |
| ${ }_{68}^{68}$ | exension |  | ${ }^{\text {E85，534 }}$ |  | E85，572 vane | oress |  |
|  |  |  |  |  |  | \％erst |  |
| ${ }_{71}^{71}$ | $\xrightarrow{\text { Hosee exension }}$ Resisenial ony | （eime |  | E45，912．507 |  | Noresimed |  |
| ${ }_{74}$ |  | $\xrightarrow{\text { Pime }}$ Core |  |  |  | AHfreauted |  |
| ${ }^{75}$ |  |  | E88，40，［199 | E60，22，10， | \％ | Hrequired |  |
| ${ }_{7}^{76}$ |  | $\xrightarrow{\text { Fininge }}$ |  |  |  | Hreaured |  |
| ${ }_{78}^{78}$ | Ofite | Preme |  | 5，962．254 |  | Norest |  |
|  |  |  |  | \％orives |  |  |  |
| ${ }^{82}$ | Office on exssing atice |  |  |  | Stas．ise vabue | Notest |  |
| －${ }_{\text {83 }}^{88}$ |  | time | （14．7．7．464 |  |  | Oresi |  |
| ${ }^{85}$ | Reala on exssing real | ne | ${ }^{2084.437 .677}$ | ${ }_{\text {ctas．530．970 }}$ |  | oress |  |
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| ${ }_{\text {88 }}^{89}$ |  | Coie |  |  |  |  |  |
| 90 | Real enessting eall | inge |  | ${ }^{\text {E7，122，811 }}$ | E74，8094 vable |  |  |
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| $\stackrel{93}{94}$ | Resio Rexsting oter | ee |  |  |  | AHfereutied |  |
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| ${ }_{1}^{120}$ |  | me | cois |  |  | Norest |  |
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| － $\begin{aligned} & 136 \\ & 137 \\ & 137\end{aligned}$ |  | Prime |  |  |  | AHfeequied |  |
| －1389 ${ }^{1389}$ | Sionexsing oftee |  |  |  |  | Hreaured |  |
|  | Res whin ofte on exssing ofice and reall |  |  |  |  | Ahreatied |  |
| $\stackrel{141}{142}$ | Resi on exstingo ofice | Pime |  |  |  | No A Arequited |  |
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| 148 <br> 149 <br> 148 |  |  | E4．960．022 | E878．300 |  | H．requied |  |
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|  | Rese | － |  |  |  | NoAfequile |  |
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| － | ¢ | Coie |  | S． |  | $\xrightarrow{\text { Notersided }}$ |  |
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|  | Onemer |  |  | 1．7．388 | ceite | ${ }_{\text {AHtreauiued }}$ |  |
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| ${ }_{36}^{36}$ |  | Sore |  |  |  |  |  |
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| ${ }_{4}^{41}$ |  | me |  |  |  | NoAA Hequited |  |
| ${ }_{4}^{42}$ | Residenial ony one exssing oftice | ne |  |  |  | Ahtrequired |  |
| ${ }_{4}^{44}$ |  | Pime |  |  |  |  |  |
| ${ }^{46}$ | Ressoentia ony on ensting oftice | ime | E1， 823.968 | E14．009，27 |  | Anfreauted |  |
| ${ }_{48}^{48}$ | $\xrightarrow{\text { Hotale－a }}$ | ． |  |  |  | Nores |  |
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| ${ }_{52}^{52}$ | Residenialany on ensingiress | ${ }^{\text {ne }}$ |  |  |  | Noatreatied |  |
| ${ }_{5}^{54}$ |  | Prime |  |  |  |  |  |
| ${ }_{5}^{57}$ | Residenial ony one exsing tes | core |  | coter |  | AHrequied |  |
| 58 | Ressemena ony yon lomer hoollest |  |  |  |  | Hrequied |  |
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| $6{ }^{63}$ | Oince and |  |  | filiz8 890 |  | Norest |  |
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| ¢ ${ }_{\text {¢ }}^{68}$ | Heate exenson | Sore |  |  |  | Sores |  |
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| ${ }_{78}^{79}$ | Oiflee onexsin oftice | Preme |  |  | （7．000．33 Vable | Norest |  |
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| ${ }_{\text {88 }}^{89}$ |  | Core |  |  |  |  |  |
| 90 | Realal onexsingo real | inge |  |  |  |  |  |
| ${ }_{92}^{92}$ |  | tinge |  |  | ${ }^{\text {atemen }}$ | Norest |  |
| 939 ${ }_{9}^{94}$ | $\frac{\text { Rese on enssingother }}{\text { Reail }}$ | Perime |  |  |  |  |  |
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| － $\begin{aligned} & 136 \\ & 137 \\ & 137\end{aligned}$ |  | Prime |  |  |  | AHfeequied |  |
| ${ }^{139}$ |  |  |  |  |  | Hreaured |  |
| ${ }_{1}^{139}$ |  |  |  |  |  | AHferumed |  |
| （141 |  | Prime |  |  |  |  |  |
| ${ }^{144}$ | ${ }^{\text {Reses on exsing } 01}$ |  |  | E68．368 |  | 0 AH feutied |  |
| － 1445 | Reses in | Coree |  |  |  | NoAtreauie |  |
| ${ }^{146}$ |  | ${ }_{\text {Feringe }}^{\text {frinse }}$ |  |  |  |  |  |
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| ¢ | Resian deation exsingo otice | core |  |  |  | Hreatred |  |
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| ${ }_{\substack{162}}^{163}$ |  | $\frac{\text { croe }}{\text { Core }}$ |  |  |  |  |  |
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| ${ }^{17}$ | Residenia ony on exsisigresid | Sime |  |  |  | Nor－vale | Hereaured |  |
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|  | Rescememala ony onexsting other |  | E15，3060．189 |  | E13．90， 5 S38 |  | Hequiled |  |
| 21 <br> 23 <br> 22 <br> 23 | Residenialo ony one exsing resi | Finine |  |  |  | vaibe | Noat reauie |  |
|  | Residenala MU ens esino ofice |  |  |  | （25．977．741 |  | Hreaif |  |
| $\begin{array}{r}23 \\ \hline 24 \\ \hline 25 \\ \hline 26 \\ \hline\end{array}$ | Ressemenil ony one exsting resi | core |  |  |  | Non－vabe | Vorest |  |
| ${ }^{26}$ | Residenial ony one exsising esi |  |  |  | － 5 E51．720 |  | $\xrightarrow{\text { No A A required }}$ Noatreutred |  |
|  | Residenial ony one exsity esi | ore |  |  |  | $\xrightarrow[\substack{\text { Nor－vale } \\ \text { Nonvable }}]{\text { and }}$ | NoAH reatue |  |
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| ${ }_{3}^{34}$ |  |  |  |  | E26，947，089 |  |  |  |
| ${ }_{\substack{35 \\ 36}}$ | Resididial ony one exsing resi | coie |  | ${ }_{\text {E．85，}}^{\text {E．4．997 }}$ |  | abe | AAH equite |  |
|  | Ressidenalo ony one exsting oter |  |  |  | $\underbrace{\text { filos }}_{\text {E6，022851 }}$ | $\xrightarrow{\text { Nor－nabe }}$ Non－vabe | NoAtream |  |
| （ $\begin{array}{r}38 \\ 30 \\ 30 \\ 40\end{array}$ |  |  |  |  |  |  | AHreal |  |
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| － $\begin{array}{r}40 \\ 4 \\ 42 \\ 42 \\ \hline\end{array}$ | Residenia ony on exssingo oftre | Prime |  |  |  | Nor－vale | $\xrightarrow{\text { AHtreauted }}$ AHrequived |  |
| （ $\begin{array}{r}48 \\ 4 \\ 4 \\ 45\end{array}$ | Residinala ony on exsiting oner |  |  |  |  | Non－wale | deatreoured |  |
| 45 <br> 46 | denla ony one exs |  | 23，536 | E14，049，27\％ | E11，256，991 | Nor－nable | Hrequifed |  |
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| $\begin{aligned} & 53 \\ & \hline 54 \\ & \hline 55 \end{aligned}$ | Residenia ony on exsting resi | Pitime |  |  |  | Nor－vale | $\xrightarrow{\text { NoAA Reatiele }}$ |  |
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| （58 <br> 50 <br> 60 | ${ }^{\text {Ressidenala }}$（ | ${ }_{\text {core }}^{\substack{\text { core } \\ \text { coie }}}$ |  |  |  | $\xrightarrow{\text { Nor－vabe }}$ Nonvabie | ${ }_{\text {ate }}^{\text {Alequired }}$ |  |
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| 64 <br> 68 <br> 68 |  | Pime |  |  | （34．951．466 | vale | Norest |  |
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| $\stackrel{76}{71}$ | Residenala ony one exstrin ofice | $\xrightarrow{\text { Fringe }}$ |  | $\substack{\text { ti0．170．126 } \\ \text { ERO．30．252 }}$ |  | $\pm$ | AHPreailed |  |
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|  | Oflic | Core | 11．305，4．58 | （50．5．545 | （20，29．938 | Vanbe | $\frac{\text { AHfreaured }}{\substack{\text { Norsid }}}$ |  |
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| － |  |  |  |  | ${ }_{\text {fili，90，0，0 }}$ |  | Norest |  |
| eb <br> $\substack{86 \\ 88 \\ 88 \\ \hline 8 \\ \hline}$ | Reaial onexsing ereail | Pime |  |  |  | vane | Norest |  |
| （ $\begin{array}{r}88 \\ 80 \\ 90 \\ \hline 8\end{array}$ | Realion enssing reall |  |  |  | ${ }_{\text {El4，} 686.977}$ |  | Hfeewir |  |
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| 93 | Resie onexsing other | Pime |  |  |  | vane | Afrequiled |  |
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| $\begin{array}{r}\text { ¢ } \\ \hline 98 \\ 98 \\ 98 \\ \hline 8\end{array}$ |  | d |  |  |  | vane |  |  |
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| ${ }_{36}{ }^{36}$ | Restemal | ore |  |  |  | Nomen | Hfequiued |  |
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| ${ }^{39}$ |  |  |  |  |  |  | An requred |  |
| ${ }_{41}^{40}$ |  | Prime |  |  |  | Nonvereme | NoAl required |  |
| ${ }_{4}^{42}$ |  | Pime |  |  |  | Noo－val | Hreatired |  |
| ${ }_{4}^{44}$ | Residenia ony on exsing oher | Pime |  |  | ${ }_{\text {E64，}}^{\text {E95，138 }}$ | Nonvale |  |  |
| ${ }^{46}$ | Ressoentia ony one exstrgo oftice | Prime |  | Ef1，099，2，27 |  | Non－vale | AHreatued |  |
| ${ }^{47}$ |  | ore |  |  |  | vave | desi |  |
| ${ }_{49}^{49}$ | Residenia ony on ensing resi |  |  |  |  | ${ }^{\text {Nom－rube }}$ |  |  |
|  | Sdenia ony on exssing tesi | me | E1，909，9，95 | E4，69，171 | f2，660．676 | vable | An real |  |
| ${ }_{53}^{52}$ | dentia ony one exsingrest | Pime |  |  |  | vaibe | No At reatied |  |
| ${ }_{5}^{54}$ |  | Pime | E884．4．36 |  |  | Norvab |  |  |
| ¢ ${ }_{\text {56 }}^{57}$ | Residenia ony on exsingrg resi | core |  |  |  | $\pm$ | Hreaured |  |
|  | sidenal ony ont lomer hootures | 通 |  |  | t8，428，624 | Noovasie | Hrequed |  |
| ${ }_{60}$ |  | \％oe |  |  |  | Non－ | Hreauried |  |
| ${ }_{61}^{62}$ | Residenial M | ${ }_{\text {core }}^{\substack{\text { core } \\ \text { Pime }}}$ |  |  |  | Vave | ，reaured |  |
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| ${ }_{6}^{64}$ |  | ${ }_{\text {Pame }}^{\text {Pore }}$ |  |  |  | vale | Norest |  |
| ${ }_{\substack{66 \\ 67}}$ | Iexere |  |  |  |  | able | ${ }^{\text {besest }}$ |  |
| ${ }^{68}$ | Hate exension |  |  |  | ${ }_{\text {ces，} 54 .}$ | vable | rest |  |
| ${ }_{10}$ | exeres |  | ${ }_{\text {Efi4，997 }}$ |  | ${ }_{\text {El4，} 597}$ | abe | tesi |  |
| ${ }_{71}^{72}$ |  | Se |  | E45，912．507 |  | vane | Noresiured |  |
| ${ }_{74}$ |  |  |  |  |  | Norvale |  |  |
| ${ }_{7}^{75}$ | Sentia ony one exsins oftice |  | E35，39，9，50 | ${ }_{\text {cta }}$ E0，221，180 |  |  | AHrequred |  |
| ${ }_{7}^{17}$ |  | Efringe |  |  |  | a－wabe | ${ }_{\text {Hegeamied }}$ |  |
| ${ }_{79}$ |  | Pime | coit | ${ }^{2.507}$ | （1．999．922 | value | Notesi |  |
|  |  |  |  | ${ }_{\text {7，} 7.758}$ |  |  | ${ }_{\text {AHtreauied }}^{\text {AHPouived }}$ |  |
|  |  |  |  | （170．126 |  | vabe |  |  |
| ${ }^{84}$ | alo onexsingro realal |  | 17，241，157 | 265，955 | O3，955，67 |  |  |  |
| ${ }_{8}^{85}$ |  | Prime |  |  |  | vale | Norest |  |
| －${ }_{8}^{88}$ | ail on exssing real |  |  | E46，509，907 | ${ }_{\text {Efict，96，3730 }}$ |  |  |  |
| ${ }^{88}$ |  | coie |  |  |  | vaple | Atoseaired |  |
| ${ }_{90}^{90}$ |  | Fringe |  | ¢ |  | vale | Norest |  |
| ${ }^{92}$ |  |  |  |  |  |  |  |  |
| ${ }_{94}^{93}$ | Resionexsting oner | ， |  |  |  | vaibe | deaured |  |
| －95 |  | Pime |  |  |  | vane | AHpreauied |  |
| 97 | Reail on exisingo ofice and reail |  |  |  |  | de | AHreal |  |
| －${ }_{98}^{99}$ | Peeal | me |  |  |  | vabue |  |  |
| 100 |  |  |  |  |  | On－vable | Hreatived |  |
| ${ }^{102}$ | Reail wint oftice on exssising eatia | Pime |  | ${ }_{\text {co }}^{\text {E9，62，933 }}$ |  | vable | NoAtrequired |  |
| ${ }^{103}$ | Remer |  |  |  |  | vanee | Noent reutied |  |
| $\begin{array}{r}105 \\ \hline 106 \\ \hline 10\end{array}$ |  | ${ }_{\text {Preme }}^{\text {Pime }}$ |  | $\substack{\text { E．3．34，991 } \\ \text { E15．50．0．04 }}$ |  | vale | Noatreaured |  |
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| ${ }_{110}^{10}$ | Hoiel on exsing oftice | Pime | Et2，71．555 | E6，022， 19 | E3，800．63 | Non－wabe | Oerst |  |
|  | Hote in exisig haiel（E） | $\xrightarrow{\text { Pime }}$ |  |  |  |  | resi |  |
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|  |  |  |  | ${ }^{7.2585}$ | ［5，565．7744 |  |  |  |
|  | － | me |  |  | ${ }^{20.687}$ |  | AHfequiued |  |
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| ${ }_{1}^{128}$ |  | Core |  |  |  | Nonvale | Hreaul |  |
| ${ }_{120}^{130}$ |  |  |  |  |  | vaie |  |  |
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|  | ${ }^{\text {Reses sun ofice on exssing oftce and } 88}$ | coue core core |  |  |  |  | AHepauted |  |
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| －138 | Son exstingoftice |  |  | ${ }_{\text {E10，}}^{6}$ | ${ }_{4}^{4} 4.3,30.4$ |  | required |  |
|  |  |  |  | E4213，622 | ${ }_{\text {cosem }}$ |  |  |  |
| $\frac{141}{142}$ | io exstra oftie | Prime | ${ }_{\text {cter }}^{\text {E2078．444 }}$ |  | f1，384．1．02 | on－vale | voatreatied |  |
| ${ }_{1}^{143}$ | Sill | ime |  | E．10．8068 |  |  | NoAAfequired |  |
| ${ }^{144}$ |  |  |  |  |  |  | Afreaured |  |
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| ${ }^{148}$ | Rese |  |  |  |  |  | Hrequred |  |
| －1490 |  | Finge |  | ${ }^{\text {e }}$ |  | value | Noatreauried |  |
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| ${ }^{167}{ }^{168}$ |  | coe | E64，959，470 |  |  | bie | AHfreauted |  |
| ${ }_{170}^{110}$ |  |  |  |  |  | Vave vape | Treatied |  |
|  | Resi in extsing waen ouse |  |  |  | ${ }^{\text {S035 }}$ |  | Ream |  |
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| ${ }^{16}$ |  | $\xrightarrow{\text { Prime }}$ PRime | （10，537 |  |  | $\xrightarrow{\text { Noresi }}$ Atrequied |  |
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| ${ }_{36}^{36}$ | Restenal ony one exsingesed | 㖪 |  |  |  | ${ }^{\text {a }}$ Hefrequiured |  |
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| ${ }^{39}$ |  |  |  | 2．800，187 | 74，9883 No | Arrea |  |
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| ${ }_{71}^{71}$ |  | Se |  | ${ }^{\text {E45，912．507 }}$ |  | Noresequied |  |
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| ${ }_{7}^{76}$ |  | ${ }_{\text {remer }}^{\substack{\text { rimge } \\ \text { Finge }}}$ |  |  |  |  |  |
| ${ }_{78}^{78}$ | Oiflee onexsin oftice | Prime |  |  |  | Norest |  |
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| ${ }_{\text {93 }}^{94}$ | Resionexsting oner | \％me |  |  |  |  |  |
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| ${ }_{1}^{158}$ |  | ${ }_{\text {reme }}^{\substack{\text { rime } \\ \text { core }}}$ |  |  |  | Hreatied |  |
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| ${ }_{101}^{101}$ | Residenialia one exsing hoiel onv | me |  |  |  | AHfequived |  |
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| ${ }_{28}^{28}$ | Residenial ony one exsing oftice |  |  |  |  | －vable | OAHreaum |  |
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| ${ }_{31}$ | Ressel | ${ }_{\text {core }}^{\text {coie }}$ |  |  |  | Sovab | VoAtreauired |  |
| －$\frac{32}{33}$ <br> 33 | Residenal ony one exsingo oftice | ${ }_{\text {core }}^{\substack{\text { core }}}$ |  | cti．fi．900 |  | Non－wable | NoAtrequred |  |
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| －${ }_{38}^{37}$ | Residenial ony one exssing oter | Sore |  |  |  | Su－vabe | Vo Ahrequited |  |
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| ${ }_{41}^{40}$ | Residenal ony on exsing tes | ${ }_{\text {Prime }}$ Prime |  |  |  |  | Noatreatred |  |
| ${ }_{4}^{42}$ |  | Prime |  |  |  | vee | Hrearied |  |
| ${ }_{45}^{44}$ | Resididinalony on exssingo other |  |  |  |  |  | Hequite |  |
| 46 | Ressenenalio ony onexsingo oflice | Prime |  |  |  | Nape | NoA feepured |  |
| ${ }_{48}^{48}$ | $\xrightarrow{\text { Holal }}$（oflee | coure |  |  |  |  | Voresi |  |
| ${ }_{4} 9$ | Ressidenial ony on exssingres | me | E1．006．116 | ${ }_{\text {E．3．86，4888 }}$ | ${ }_{\text {E2，} 2857.373}$ |  | voatrequred |  |
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| ${ }_{\substack{54 \\ 55}}$ | Residenial ony one exsing esi | Prime |  |  |  | Non－vabe | NoAh requred |  |
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| ${ }_{58}$ |  | coie |  |  |  | Vabe | AHfereuried |  |
| ${ }_{5}^{59}$ | ${ }^{\text {Resedemala }}$（ |  |  |  |  | vate |  |  |
|  |  |  | E8，55，380 |  | E6，866，123 |  |  |  |
| ${ }^{62}$ | Oitce－Mu witres | Prime |  |  |  |  | $\frac{\text { Ahreaum }}{\text { Norest }}$ |  |
| ${ }_{65}^{64}$ |  | $\xrightarrow{\text { Pime }}$ |  | ciners． |  | vaibe | Noresil |  |
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| ${ }_{68} 8$ | Hotele exension | Core | cex | － |  | value | Norosi |  |
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| $\frac{71}{12}$ |  | $\xrightarrow[\substack{\text { core } \\ \text { cime }}]{\text { Prime }}$ |  | E45，912，507 |  | vale | $\xrightarrow{\text { Noresi }}$ Atrewied |  |
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| ${ }_{7}^{14}$ |  | ${ }_{\text {core }}^{\text {core }}$ |  |  |  |  | Ahreaum |  |
| ${ }_{76}^{7}$ |  | Fringe |  |  |  | $\substack{\text { Nor－vale } \\ \text { Nonvende }}$ | AHfereutied |  |
| ${ }_{7}^{78}$ |  |  |  |  |  |  |  |  |
| ${ }_{80}$ |  | Pime | S12003 | （906．24． | （10．95， |  | ${ }_{\text {Nores }}^{\text {Nores }}$ |  |
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| －${ }_{\text {83 }}^{84}$ |  | Pime |  |  |  | vane value | Noresi |  |
| －85 ${ }_{86}^{86}$ |  |  |  | ${ }_{\text {E4，} 520.5970}$ | ${ }^{\text {E161．91，} 1,683}$ ， | vaibe | oresi |  |
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| 93 <br> 94 <br> 9 | Resion enssing otier | me |  |  | ${ }_{\text {El12，} 210.3022}$ |  | Hreaured |  |
| ${ }_{95}^{94}$ |  | Pime |  | ${ }_{\text {cta }}$ | ${ }_{\text {cta }}$ | value | Atreatued |  |
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| 99 | Reail |  | ${ }_{\text {E168，} 147,830}$ |  | ${ }_{\text {E456，}}^{\text {E5723 }}$ |  | AHfereuied |  |
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Appendix 3 - Appraisal results (with growth)


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|  | Ressoentia ony on ensting oftice | ime | ${ }_{\text {cter } 21.1699}$ | El4，099，27\％ |  | Anfrewured |  |
| ${ }_{48}^{47}$ | Hotel－ － |  | $\substack{\text { E30．0．2．20 } \\ 61.520 .004}$ |  |  | $\xrightarrow{\text { Noress }}$ Notest |  |
| ${ }_{50}^{49}$ | Residenia ony on exsing resi |  |  |  |  | ${ }^{\text {NoAtrequired }}$ |  |
| ${ }_{51}^{51}$ | adema ony on exssing tesi | Pime |  |  |  | voAH Fequited |  |
| ${ }_{52}^{52}$ | Residenialany on ensing ress | ne |  |  |  | No AH Fewitied |  |
| ${ }_{5}^{54}$ |  | Prime | cti． |  |  |  |  |
| ${ }_{5}^{57}$ | Residenial ony one exsing tes | core |  | coter |  | AHrequied |  |
| 58 | Ressemena ony yon lomer hoellest | 隹 |  |  |  | Hrequied |  |
| ${ }_{6}^{50}$ | ${ }^{\text {Resedenail }}$ Ru | 隹 |  |  |  | AHfereaured |  |
| ${ }_{6}^{62}$ | Restiential MU |  | E7，7938．815 | E696，707 | Ef7，07．108 Vable |  |  |
|  | dindee end horel | Pime | 42，466 |  |  | $\frac{\text { Afreaul }}{\text { Notesi }}$ |  |
| 64 <br> 65 |  | ${ }_{\text {Paine }}$ |  | ciliz8， 8 |  | Noresi |  |
| ${ }_{6} 6$ |  |  |  |  | 31，4012 |  |  |
| ${ }_{68}$ | Hoiele exenson | oie | ${ }_{\text {citiof．} 660}$ | ${ }_{\text {co }}$ | ${ }_{\text {f10，}}$ fi66 vable | Norest |  |
|  |  | Singe | ${ }_{\text {E93，421 }}$ |  | Sis vale | Sorest |  |
| $\frac{71}{72}$ |  | Core |  | E45．912．507 |  | $\xrightarrow{\text { Noreses }}$ Atrequied |  |
|  |  |  | ${ }^{\text {E97．497，597 }}$ |  |  |  |  |
| ${ }_{75}^{74}$ |  | core |  |  |  | AHfreaulued |  |
| ${ }_{76}^{77}$ |  | $\xrightarrow{\text { Fininge }}$ |  |  | $\underbrace{\text { tub }}$ | AHferequeded |  |
|  | oftrice one |  | ${ }_{\text {E38233038 }}$ | 2，966，294 | ， 27.7 ，784 Vabie |  |  |
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| ${ }_{\text {¢ }}^{8}$ |  |  |  |  |  |  |  |
| ${ }_{85}$ | Real onexsting erall | ${ }_{\text {Prime }}^{\text {Pime }}$ |  |  |  | Norest |  |
| ${ }^{88}$ |  | Pime |  |  |  | Norest |  |
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| ${ }_{90}^{90}$ | Real | 析 |  |  |  | S |  |
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| －93 ${ }_{9}^{94}$ | Resion exssigo oher | me |  |  |  | ${ }_{\text {AH Preauied }}$ |  |
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| 97 | Reail on exsisingofotice and reail | Pime |  | ${ }_{\text {ctios．}}^{658.737}$ | ${ }_{\text {E85，922，75 }}$ Vababe | AHreaured |  |
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| ${ }^{1288}$ |  |  |  |  |  | $\xrightarrow{\text { Norest }}$ Norest |  |
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| 132 | wit esture on exis |  | ${ }^{\text {abe }}$ | ${ }_{\text {filog，005，519 }}$ | E661，24，0，057 vabie | voresi |  |
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| 139 |  | Prime |  |  |  | Afrequiled |  |
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| $\begin{array}{r}144 \\ 145 \\ \hline\end{array}$ | ${ }^{\text {Reses on exsing }}$ Refly |  |  | cemen |  | AHrequived |  |
| ${ }_{145}^{145}$ | Res sinitreal on exsingr reall and oftice | Pime | ${ }_{\text {El7 }}^{6}$ |  |  | NoAAH reatured |  |
| ${ }_{1}^{148}$ | Rese | frime |  |  |  | ${ }_{\text {Ahtereutied }}^{\text {Afed }}$ |  |
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| ${ }_{24}^{24}$ |  | Coie |  |  |  | AHferequied |  |
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|  | Ienial ony one exsting ofice |  |  |  |  | IoA freaured |  |
| ${ }^{29}$ | Ressemiala oly one exsing ofitce | 棫 | ${ }_{\text {E．3，74．686 }}$ | E4，585．522 |  | AHreaured |  |
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| ${ }_{36}^{36}$ | Restenal ony one exsingesed | （oore |  |  |  | ${ }^{\text {a }}$ Hefrequiured |  |
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| ${ }^{39}$ |  |  | E1，46，9，92 | ${ }^{2,8001,18}$ | ${ }_{\text {fli，}}^{1,23,2,255}$ | Arrea |  |
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| ${ }_{43}^{48}$ | Residenial ony one exssing oftice | ne |  |  |  | Ahtrequired |  |
| ${ }_{4}^{44}$ | Residenia ony on exsing other | Prime |  |  |  |  |  |
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| ${ }_{51}$ | Residemain ony one exssing fesi | Pime |  |  |  |  |  |
| ${ }_{5}^{52}$ | Residenialany on ensing ress | ne |  |  |  | Noatreatied |  |
| ¢ ${ }_{5}^{54}$ | Residenal ony on exsisioresi | Prime |  |  |  | NoAn Requived |  |
| ${ }_{56}^{59}$ | Residenia any one exsing tes | e |  | coter |  | AHrequied |  |
| ${ }_{58}^{58}$ | Ressemena ony yon lomer hoelvest |  |  |  |  | Hrequred |  |
| 59 60 | $\xrightarrow{\text { Resedenail }}$ RU | 隹 |  |  |  | AHfereaured |  |
| ${ }_{61}^{62}$ | Restiential MU |  | E9．0．0．645 | E696．707） | E8．03，3，388 Vavale |  |  |
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| ${ }_{6}^{64}$ | ${ }_{\text {Reationy }}^{\substack{\text { Reasiony } \\ \text { Resenal ony }}}$ | ${ }_{\text {Pime }}^{\text {Coine }}$ |  | ciliz8， 8 |  | Norest |  |
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| ${ }^{68}$ | Hoele exenesson | ore | E100．0．76 | ${ }_{\text {co }}$ | E1090，076 vabe | Norest |  |
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| ${ }_{71}^{71}$ |  | Core |  |  |  | $\xrightarrow{\text { Noreses }}$ Atrequied |  |
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| ${ }_{75}^{74}$ |  | core |  |  |  | AHfreaulued |  |
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| ${ }^{85}$ | Reala on exssing real | ne | ${ }^{230,7474.468}$ | ${ }_{\text {E46，520．970 }}$ |  | oress |  |
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| $\stackrel{93}{94}$ | Resio Rexsting oter | ee |  |  |  | AHfereutied |  |
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| 100 <br> 101 <br> 10 |  |  |  |  |  |  |  |
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| $\stackrel{103}{104}$ | Reeal |  |  |  |  | Vorest |  |
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|  | omit |  | ${ }^{607}$ |  |  |  |  |
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|  | 2exs |  | ：973，994 | ${ }_{12,125,1}$ |  | Norest Noatrealied |  |
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| ${ }^{129}{ }_{1}^{130}$ |  | me |  | cile |  | Noresi ${ }_{\text {Nout reaured }}$ |  |
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| －132 | Casiow whesteren exssing |  |  |  |  |  |  |
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| ${ }_{138}^{138}$ |  |  |  |  |  | Hrequred |  |
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| －${ }^{141}$ | Resis on exsing oftice | Pime | ${ }_{\text {E3，318．092 }}$ |  | Et14．4．43 Non－varale | vo AH Fequited |  |
| ${ }_{143}^{143}$ |  |  |  | ceios．69 |  | VoAtrean |  |
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| ${ }_{1}^{146}$ |  | tinge |  |  |  | AHferequied |  |
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|  | Rese | tione |  | ${ }_{\text {E } 5,56,4.46}$ |  | NoAfequile |  |
| －153 | Resion exxing eecercicry subssaion | ${ }_{\text {Prime }}^{\text {Pime }}$ |  |  |  |  |  |
| ${ }^{155}$ | Resion exstigatite | 析 |  |  |  | NoAtrseutied |  |
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| ¢ |  | core |  |  |  | Hreatied |  |
| ${ }_{\substack{160 \\ 161}}^{161}$ |  |  | $\underbrace{\text { E12，093，}}_{\text {E451．077．8．85 }}$ |  |  | Hreatied |  |
| （162 |  | ${ }_{\text {core }}^{\text {core }}$ |  |  |  | Hreatied |  |
| －164 <br> $\substack{165}$ | ¢ | Sore |  | S． |  | $\xrightarrow{\text { Notersi }}$ Alumed |  |
| （166 |  |  | （170．09， |  |  | treuted |  |
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|  |  | ${ }_{\text {come }}^{\text {Pome }}$ |  |  |  | Nabe | NoAH Feguried |  |
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| ${ }^{29}$ | enta onyy nenstisig oftice | core | ${ }_{\text {E2，} 3 \text { 2，} 232}$ | E4，855．522 | f2．50．6．10 | avale | Hequited |  |
| ${ }^{30}$ 31 |  | \％oe |  |  |  | Nan－ve | Sters |  |
| 32 <br> 33 <br> 38 | Residenila ony on exsingo ofice | core |  | ceity |  | Non－vale | OAA reatured |  |
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| ${ }_{36}{ }^{36}$ | Restenal ony one exssigrest | （eore | ${ }_{\text {E．250，}}^{\text {E．566 }}$ |  |  | Nonvene | Hfequiued |  |
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| ${ }^{39}$ |  |  |  | ${ }^{228001,187}$ | ${ }^{\text {fli，} 5 \text { S6，867 }}$ |  | AA requil |  |
| ${ }_{41}^{40}$ |  | Prime |  |  |  | Nom－ | （oatreuwled |  |
| ${ }_{4}^{42}$ | Residenia ony one exssingo ofice | Preme |  |  |  | Nor－vab | reatired |  |
| ${ }_{4}^{44}$ | ${ }^{\text {Ressidenial ony on exssingo other }}$ |  |  |  |  |  | ${ }^{\text {Hfequite }}$ |  |
| 46 | Ressientala ony on exssing ofice | ${ }_{\text {Prime }}$ |  |  |  | Nonvale | ${ }^{\text {anderemumed }}$ |  |
| ${ }_{48}^{48}$ | Holele | ore |  |  |  | vane | rest |  |
| ${ }^{49}$ | Sidenia ony y nexsimpres | rime |  |  |  | Non－w | AAH reaured |  |
| ${ }_{51}^{51}$ | Residemaid ony one exssing isiesi | me |  |  |  | Non－vabe | Lo A Hequuted |  |
| 52 <br> 58 <br> 5 | Residenial ony on ensiting resi | Pime | $\underbrace{\text { E3，21．05 }}_{\text {E1．35，7．37 }}$ |  |  | Noonvale | No AH Required |  |
| ${ }_{5}^{54}$ | Residenial ony on exssing eses | ${ }_{\text {Prime }}^{\text {Pime }}$ | ction |  |  | Norvab |  |  |
| ¢ ${ }_{\text {56 }}^{57}$ | Residenia any one exsingri res | cre |  |  |  | Non－vale | Hreaured |  |
|  | didemala ony on lomer hoetless | 㖪 | ${ }_{\text {cke }}^{\text {E．4．3．3000 }}$ |  | Et， $4,61.032 \times$ N | O－ | Hequlued |  |
| ${ }_{60}$ |  | eoe |  |  |  | Non－ | Hreauried |  |
| ${ }_{61}^{62}$ | Resticenial Mu | Pime | E6，199，003 |  |  | value | reauied |  |
|  |  |  |  |  |  |  | Noresi |  |
| ${ }_{6}^{64}$ |  | ${ }_{\text {coime }}^{\text {Pome }}$ |  |  |  | vabe | Norest |  |
| ${ }_{\substack{66 \\ 67}}$ | Iexeren |  |  | － | ${ }_{\substack{\text { E1299，98，} \\ \text { E39，}}}^{\text {a }}$ | abe | ${ }^{\text {besest }}$ |  |
| ${ }_{68}^{68}$ | Ioie exensison |  |  |  |  | vane | frest |  |
|  | Hoale exersio |  |  |  |  |  | tesi |  |
| ${ }_{71}^{72}$ |  | Se |  | E45，912．507 | ${ }_{\text {E466．a38 }}^{\text {E93930 }}$ | Vabe | Noresiured |  |
| ， $\begin{array}{r}78 \\ 74 \\ \hline 14\end{array}$ |  | core |  |  |  | Non－vaile |  |  |
| ${ }^{75}$ | Sentia ony one exsins oftice |  | ${ }_{\text {E4，} 14.36 .682}$ |  | E19，78，4990 | onva | Hrequiled |  |
| ${ }^{16}$ | Residenal ony one exsing ofice | Efringe |  |  |  | Non－ | ${ }_{\text {Hegeamied }}$ |  |
| ${ }_{\substack{78 \\ 79}}$ |  | $\xrightarrow{\text { Prime }}$ Peme |  | ${ }^{2.507}$ |  | Vabe vabie | Notest |  |
|  |  |  |  |  | （3， |  | ${ }_{\text {Alt eauted }}$ |  |
| ${ }^{82}$ |  |  | 508 | 0，178．120 | ，421．42 V | vable |  |  |
| ${ }^{83}$ | $\xrightarrow{\text { Oinceo ensxingo oneel }}$ |  | cole | 50505035 |  | vapee |  |  |
| ¢ ${ }_{85}^{85}$ | Realo ensesting reall | Pime |  |  |  | vabe | Norest |  |
| ${ }^{87}$ | Reaio onexing eall | Pime | ${ }^{\text {Prenorati，}}$ |  |  | vape | Norest |  |
| 88 <br> 89 <br> 89 |  | core | ${ }_{\substack{629.972 .591 \\ 653294.36}}$ | cile |  | vane | ${ }_{\text {dreated }}^{\text {Hreatied }}$（rest |  |
| ${ }_{90}$ | Reallo oe essing ereal | Einge |  |  | ${ }_{\text {E2，} 171.5866}$ | ， | lorest |  |
| ${ }_{92}$ |  | empe |  |  |  |  |  |  |
| ${ }^{93}$ | Resion exstingother | ee |  |  |  | vanbe | AHfequived |  |
|  | mires on exsing oftea ard |  |  |  |  |  |  |  |
| ${ }_{96}$ | Wht fifice on exssing reata and |  |  | ${ }_{\text {E96，55，115 }}$ | E99，922，132 | vaple | Nores |  |
|  | －Reaial en exsing ofitie and eleai | ${ }_{\text {Preme }}^{\text {Pime }}$ |  |  |  | vaie | H．teguiued |  |
| ， | －Reaial whto otice one exsing cis |  |  | ${ }_{\text {E61，2021222 }}$ | ${ }^{\text {c4670292974 }}$ |  | Hreaulied |  |
| 100 <br> 101 <br> 101 |  | Pine |  |  |  | vaie | AHreatued |  |
| $\begin{array}{r}102 \\ \hline 103 \\ \hline 1\end{array}$ | 1 Real win oficico one exsisin real | ${ }_{\text {Preme }}^{\text {Prime }}$ |  |  |  | Vane | NoAhreatied |  |
| ${ }_{104}^{104}$ | Reailo on exsimo oftice end retail |  | ${ }_{\text {fiol．001．157 }}$ | ${ }_{\text {c8，} 1038899}$ | Et22972，29 V |  | ${ }^{\text {athrequired }}$ |  |
| －105 | Remen | ${ }_{\text {Preme }}^{\text {Pime }}$ |  |  |  | vabe | NoAtrequred |  |
| ${ }^{108}$ |  | Pime | 边 | ${ }_{\text {E577．70 }}^{\text {tic }}$ |  | vane | $\frac{\text { Altreaured }}{\text { Noresid }}$ |  |
| ${ }^{110}$ |  |  |  |  |  | $\frac{\text { vaile }}{\substack{\text { vonvole }}}$ | Norest |  |
|  |  |  |  |  |  |  |  |  |
| ${ }^{112}$ |  |  | ctise |  |  |  | drest |  |
|  | －oitree withes one exstin ofice and 88 |  |  |  |  |  | Heesured |  |
|  | Oince inireai one exsing hotel |  |  | （2，463．638 |  | de | Hifequied |  |
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|  | Ootite en exsingo ditice | me |  |  |  |  | resi |  |
|  | 退 | Pime |  |  |  | vane | Notest |  |
|  |  |  |  |  |  | ee | Hrequiled |  |
|  | ST：Resis realil oftice and hotele onexsting |  |  | ${ }_{\text {E50，} 2088,870}$ |  |  |  |  |
|  |  |  |  |  |  | vale |  |  |
|  | Nontucuin iniem a aseenent | Pime |  |  |  |  |  |  |
| ${ }^{139}$ |  | 既 | comitione |  |  | Non－vabe | Noatreaulied |  |
|  | onexsitig hoel | Pime |  |  |  |  | Norest |  |
| ${ }^{133}$ | Leon exsing ninhicub |  |  |  |  | Non－${ }^{\text {Nabale }}$ | Loresi |  |
|  |  | 通 |  |  |  | vaie | Hrequed |  |
|  |  | me |  |  | ${ }_{\text {che }}^{\text {E4，9096．698 }}$ |  | feaured |  |
|  |  |  |  |  |  | No．vale | Hreatied |  |
| （140 | Resi onexsiting oftre | sime |  |  | ${ }_{\text {E4，}}^{\text {E4，97，575 }}$ | Non－inale | H Hequired |  |
| ${ }^{142}$ | Went | Prime |  |  |  |  | ${ }^{\text {a }}$ at Hequaured |  |
|  | ion exsening O1 | ${ }_{\text {Preme }}^{\text {Pime }}$ Coie |  |  |  | $\frac{\text { vaile }}{\text { vonvele }}$ | OAARequired |  |
| ${ }_{146}^{146}$ | Resi winteral on exstivg reatal and ditice |  |  |  |  | vane | Afreatured |  |
| ${ }_{1}^{146}$ | Resion oxsting tephone exchange |  |  |  |  | vave | Hequiled |  |
| ${ }_{\substack{148 \\ 149}}$ | Resio onexting putic house（disused） |  |  | E878．300 |  | vaie |  |  |
|  |  | Firine |  | \％ |  | vaibe | Voat reautied |  |
| ¢ |  | e |  |  |  | vande | reatied |  |
|  |  | me |  |  | ${ }_{\text {che }}$ | ， | Hetrealed |  |
| ${ }_{\text {ctis6 }}^{1156}$ |  | 㖪 |  |  |  | vabe | No．threwiled |  |
| ${ }^{158}$ | Resion exsing ealaloltice | Pime |  |  |  | onvabe | Hreatied |  |
| $\stackrel{159}{150}$ | Resioloter esesonss on enesting resi | $\xrightarrow{\text { Finige }}$ |  |  |  | vable | reaum |  |
| ${ }_{\substack{161 \\ 162}}$ | Resiemia one exsing hote coovv | Pite |  |  |  | Nonviale | Hrequited |  |
| （1088 | Hoil and eses one exsting oftice | Core | ${ }_{\text {cose }}^{\text {E39．155．0．76 }}$ |  |  | veabe | Hepequed |  |
| （1068 | Stesinealilofice one | core | E4， | ciele |  |  | ${ }_{\text {Nores }}^{\text {NHequiled }}$ |  |
| ${ }_{106}$ | Hoiliresiemalo onexing oince | ere |  |  |  |  | ${ }_{\text {AH Heeque }}$ |  |
| （168 |  |  |  |  |  | be |  |  |
|  |  |  |  |  |  |  | ${ }_{\text {reme }}^{\text {reawe }}$ |  |
|  |  | （ime |  |  |  | vaile | Hreatied |  |
| 173 | Resi in exstiringatatese |  | ¢7，127，276 | E1，779，0939 |  |  |  |  |
| ${ }_{1}^{176}$ |  |  | cole |  | comer | None | Hreatued |  |


| WESTMNs | Ster local plan | vinile and Ah reard |  | Commercial A coom |  |  |  | ${ }_{408}^{308}$ |
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| ${ }_{\text {Prex }}^{\substack{\text { Puny } \\ \text { number }}}$ | Deveroponent type | Area | RıV | sıv | Surpusispeatict ${ }^{\text {a }}$ | Vablenon |  | com PL |
|  | Otice－MU Wutires and reatal | me |  |  | 16,7 |  | ${ }_{\text {AHeremued }}$ Arequed |  |
|  | Residenial ony one exsingo oftes | Pime |  |  | cotion | $\substack{\text { Non－}{ }_{\text {Nable }}^{\text {Nonvaide }}}$ | OAfreautred |  |
|  | Reall MU |  | 24，594 |  |  |  | NoA Heal |  |
|  |  | Pime |  |  |  | vabe |  |  |
| 9 |  | Porme |  |  |  | None | VoAt required |  |
|  | demanaly on exsting office | Prime |  |  |  |  |  |  |
|  | －omee MU ${ }_{\text {desidenal MU }}$ | Prime | （115．30．437 |  |  | vabe | ${ }_{\text {der }}^{\substack{\text { requilied } \\ \text { reuled }}}$ |  |
| ${ }^{14}$ |  | ${ }_{\text {Prime }}^{\text {Pore }}$ |  |  |  | vaile | Norest |  |
| ${ }^{15}$ |  | Ppme |  |  |  | Nonvab |  |  |
| ${ }^{17}$ | Sentia oly nenexsing ofite | core | ${ }^{\text {E570，922 }}$ | ${ }^{\text {f554，044 }}$ | $\mathrm{ElO}_{16,878 \mathrm{~V}}$ |  | NoAf requited |  |
|  |  | Finge |  |  |  | Non－vale | No．treatied |  |
| ${ }_{21}$ | Restidenialony on exsitin other | Fringe |  |  |  | vave vabie | Hey reailed |  |
|  |  |  |  |  |  |  | AHreaul |  |
| ${ }_{24}^{24}$ | Residenial ${ }^{\text {a }}$ N | $Core$ |  |  |  | Vate | Hreatied |  |
| ${ }_{26}^{26}$ | Residenial ony one exsing resi | ore |  | E11050．188 |  |  | Vorest |  |
| ${ }_{\substack{27 \\ 28 \\ 28}}$ | hexting ofice |  |  |  |  |  | atreaured |  |
| ${ }^{29}$ | emia onyy onessising oftice | core | ${ }_{\text {E2，732．516 }}$ | E4，585．522 | f2，1259956 | vabe | Hequited |  |
| ${ }_{3}^{30}$ | Rosiel | ere |  |  |  | Norve | defrequred |  |
| ${ }^{32}{ }^{33}$ | Residenia ony on exsing office | core |  |  |  | Nonvale | OAA Requried |  |
|  |  | core |  | 56，741．251 | E21，196，201 V |  | AAr real |  |
| ${ }_{36}^{36}$ | Restenal ony one exsingeses | （eore |  |  |  | Nomer | Hfequiued |  |
| －37 <br> 38 <br> 8 |  |  |  |  |  | Norvabe | Voat rewired |  |
| ${ }^{39}$ |  |  | ${ }^{1.1 .66,6.13}$ | ${ }^{228001,187}$ |  |  | AA requil |  |
| ${ }_{41}^{41}$ | Residemin ony one exsting fest | Prime |  | 隹 | （tithiso | Nonvole | （outreuwred |  |
| ${ }_{4}^{42}$ | Residenia ony one exssing oftice | Preme |  |  |  | de | reatired |  |
| ${ }_{4}^{44}$ | ${ }^{\text {Ressidenial ony on exssingo other }}$ |  |  |  |  | Snave | ${ }^{\text {Hfequite }}$ |  |
| ${ }_{46}$ | Ressientala ony on exssing oftice | ${ }_{\text {Prime }}^{\text {Pime }}$ |  |  |  | Nonvabe | ${ }^{\text {anderemumed }}$ |  |
| ${ }_{4}^{48}$ | Holel | Core |  |  |  | vane vabie | Iess |  |
| ${ }^{49}$ | Sidenia ony y nexsimpres | rime |  |  |  | Non－ | AAH reaured |  |
| ${ }_{51}^{51}$ | Residemaid ony one exssing isfesi | me |  |  |  | Non－wabe | Lo A Hequuted |  |
| ¢ ${ }_{5}^{52}$ | Resideniala ony on ensiting ress | Pime |  |  |  | Non－${ }_{\text {Nable }}^{\text {Nonviabe }}$ | No AH Required |  |
| ${ }_{5}^{54}$ | Residenial ony one exssing ess | Prime |  | ctire |  | Nonvabe | NoA fequiured |  |
| ¢ | Residenia any one exsingr rest | coie |  |  |  | Non－vale | Hreaured |  |
|  | denial ony on lomer hoellesi |  | E4．003．532 |  | Et， $8.80,980$ | Nonval | Hequlued |  |
| ${ }_{60}$ |  | core |  |  |  | Nomen | Hreaured |  |
| ${ }_{61}^{62}$ | Residenalimu | ${ }_{\text {core }}^{\substack{\text { core } \\ \text { Prime }}}$ | ctione |  |  | Vave | ${ }_{\text {deatied }}$ reulied |  |
|  |  |  |  |  |  |  | Notesi |  |
| ${ }_{6}^{64}$ | ${ }_{\text {Real }}^{\text {Resiony }}$（enta ony | ${ }_{\text {coime }}^{\text {Pome }}$ |  |  |  | vaibe | Norest |  |
| ${ }_{6}^{66}$ | exen | ${ }_{\text {core }}^{\substack{\text { coie } \\ \text { coie }}}$ |  | － |  | able | ${ }_{\text {dest }}^{\text {oresi }}$ |  |
| ${ }_{68}^{68}$ | Ioie exensison |  |  |  |  | vane | rest |  |
|  | Hoielexenso |  |  | － |  |  | tesi |  |
| ${ }_{71}^{72}$ |  | are |  | E45，912．507 |  | vabe | Noresiured |  |
|  |  |  |  |  |  | －vab |  |  |
|  | Iony nex |  | ${ }_{\text {ctabers }}$ |  |  | vande |  |  |
| ${ }_{7}^{76}$ |  | $\xrightarrow{\text { Fringe }}$ Finge |  |  |  | Non－vale | Hreaut |  |
|  |  |  |  |  | ${ }^{25,7838,164, ~ V}$ |  |  |  |
|  |  | me |  | ，．077．763 | 518，24 | vave | reauted |  |
| ${ }^{82}$ | orite on exstino onte | 㖪 |  | （105．45 | 210．721 | vaibe | ${ }_{\text {reged }}^{\text {reaired }}$ |  |
| ${ }_{\text {¢ }}^{\substack{88 \\ 84 \\ 84}}$ |  |  |  |  |  | vaibe |  |  |
| ${ }_{8}^{85}$ | talal onexsing retalal | pime |  | E46，530．970 | ${ }_{\text {E184，212，} 2,90 \mathrm{~V}}$ | vaibe | Noresi |  |
| ${ }^{88}$ | Reaio onexing eall | Pime |  |  |  | vape | Norest |  |
| ${ }_{\text {¢ }}^{88} 8$ |  | core | ${ }_{\substack{629.944 .455 \\ 653.20,24}}$ | cile |  | vane | Hequited |  |
| ${ }_{90}^{90}$ | Reallo oe essing ereal | Einge | E92982038 |  |  | vane | Ioresi |  |
| ${ }_{92}$ | Reail one exssing ealal | einge |  |  | 隹 |  |  |  |
| ${ }^{93}$ | Resion exsing oher | ee |  |  |  | vabie | AHequiled |  |
| ${ }_{9}^{94}$ | mires on exsing oftea ard |  |  |  |  |  |  |  |
| ${ }_{96}$ | Ith ofitico on exsing realil and offic |  | E193，475，237 | ${ }_{\text {E96，55，115 }}$ | E96，924，122 V | vaple | Nores |  |
|  | －Reaial en exsing ofitie and eleai | ${ }_{\text {Preme }}^{\text {Pime }}$ | （1413．30．046i |  |  | vaibe |  |  |
| 90 | －Reaial whto otice one exsing cic |  | ${ }^{\text {cticis．61．47 }}$ | ${ }_{\text {E61，2021222 }}$ |  |  | Hrequiled |  |
| 100 <br> 101 <br> 101 |  | Pine |  |  |  | vaie | AHreatued |  |
| －102 |  | ${ }_{\text {Preme }}^{\text {Prime }}$ |  |  | ${ }_{\text {E95020，028 }}^{\text {E442200 }}$ | vane | NoAtreatred |  |
| ${ }^{104}$ | Reailo on exsimo oftice end retail |  | ${ }_{\text {fiole }}$ |  | E2，76，6．645 V |  | ${ }^{\text {ath required }}$ |  |
| －105 | Remen | ${ }_{\text {Preme }}^{\text {Pime }}$ |  |  |  | vabe | NoAtrequred |  |
| ${ }^{108}$ |  | Pime |  | ${ }_{\text {E577．70 }}^{\text {tic }}$ |  | vane | $\frac{\text { AHtreaured }}{\substack{\text { cosed }}}$ |  |
| － 109 |  |  |  |  |  |  | Noest |  |
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|  | －oitice withesion exssing oficie and 88 |  |  |  |  |  | $\xrightarrow{\text { Atheremued }}$ |  |
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|  | －otice enexisingo oftre | e |  | 9，2021200 | Etioas， | rabe | ${ }_{\text {lest }}^{\text {resi }}$ |  |
|  |  | ime |  |  |  |  | Norest |  |
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|  | St：Resion exitingites．r．ealarand di | ee |  |  |  | Nonvale | reaur |  |
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| 127 |  | Pin |  |  |  | 为 | tieat |  |
| 120 <br> 130 <br> 180 |  | me |  |  |  | Vaile | Noresi |  |
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| ${ }^{133}$ | 为 | Pite |  |  |  | vonve |  |  |
|  |  | core |  |  | ER2802，599 |  | Hrequed |  |
|  |  | Pime |  |  |  | vaibe | Hreautied |  |
|  | witr reail one exsing oficce and realal |  |  |  |  |  | reaur |  |
|  | Resis | Ppime |  |  |  | vaibe | Hrequed |  |
| － 140 |  | Pime |  |  |  | Non－ | $\frac{\text { An required }}{\text { NoAl feutied }}$ |  |
| ${ }_{142}$ | Si wh reation exsexing oftice and realal |  |  |  | ¢t， |  | ${ }^{\text {AHPreaw }}$ |  |
| ${ }_{1}^{145}$ | Resis onexsing oftice | core |  |  |  | Nonvenale | NoA fequiled |  |
|  | win | Preme |  |  |  |  | OAf equered |  |
| ${ }^{1478}$ | Res on ensining eiephone exchange |  |  |  |  |  | Hreatied |  |
| ${ }_{1} 149$ |  |  |  |  |  | abe | NoAAfrequited |  |
|  | Resem | Ferme |  |  |  | vape | NoAhtreuwred |  |
|  | Ress witrealis sorage and oum oneen |  |  |  |  |  | Hreatied |  |
|  |  | ${ }_{\text {Porme }}^{\text {Poime }}$ |  |  |  | on－vabe | VoAt requred |  |
|  |  | coie |  |  |  |  | Seres |  |
| ${ }^{158}$ | Reseme | Come | ${ }_{\text {Ex }}^{614,1008,899}$ |  |  | avabe | Hrequired |  |
| （1300 | Res | finge |  |  |  | Nonvale | Hreau！ |  |
| ${ }_{\substack{161 \\ 182 \\ 182}}$ | Restemena en exstran hoiel conv | ${ }_{\substack{\text { Pime } \\ \text { coie }}}^{\text {coic }}$ | Et， |  |  | Nonvale | Hreatred |  |
| ctict |  | Core |  | ${ }_{\text {Ee3，} 665,533}$ |  |  | $\frac{\text { AHfeguied }}{\text { Noresiled }}$ |  |
| ${ }_{\substack{165 \\ 1.65}}$ | Resitealalofte on | apime |  |  | ${ }_{\text {E88．0．3．05 }}$ | Vaile | ${ }_{\text {AHereguied }}^{\text {AHfoulued }}$ |  |
| ${ }^{1068}{ }_{1}^{1688}$ |  | coe | E77，056．159 |  |  | avie | AHf ereaured |  |
| ${ }_{170}^{110}$ |  | Core |  |  |  | Vave vape | Treatied |  |
|  | Resion extrin waereouse | ime | （90751 |  |  |  | Ream |  |
|  | Resisand realil one exsting oftee | core |  |  | E4，53， 4.47 | Non－vaile | Hequtued |  |
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| ${ }_{\substack{\text { Proxy } \\ \text { number }}}^{\text {net }}$ | Development type | Area | RLV | BLV | Supissideficilv | Vabenon |  | com Pu |
|  | ofte－MU win res and reatil | Pime |  |  |  |  | $\xrightarrow{\text { Alreguired }}$ |  |
|  | Ressidinalony one exsing ofite | $\xrightarrow[\substack{\text { core } \\ \text { Prime }}]{\text { ciel }}$ |  | ${ }_{6}^{65976.6}$ |  |  | VoAtreatied |  |
|  | Hoeimmh rest | Pinme |  |  |  |  | Noatreauted |  |
|  | ${ }^{\text {Realal }}$ Me | Pime |  |  | （107266．499， |  | NoAf reauif |  |
| 8 | Ress | Pime | ${ }_{\text {E3，573．307 }}$ |  | ${ }_{\text {E142421．374 }}$ | Non－wabe | No Ahreaut |  |
|  | Ressemana ony on exsingo office | Pime | E6，84，9，972 | E10．064，022 | ${ }_{\text {ta，222，2050 }}$ | Non－wabe | AHfequired |  |
|  | （omese－mu | Pime |  |  |  | vane | ${ }_{\text {An frequifed }}$ |  |
|  | Reationy | ${ }_{\text {Preme }}^{\text {Prime }}$ |  |  |  | $\xrightarrow{\text { vaile }}$ Non－we | $\pm$ |  |
|  | Rentee MO | Pime |  |  |  | vave | Norest |  |
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|  | ointee MU |  |  |  |  |  | NoA requed |  |
| ${ }_{25}^{24}$ | Residenialo ony onexsingo fitce | ore |  |  |  | vone | AHtequived |  |
| ${ }_{\substack{26 \\ 28}}^{23}$ | Residenal ony on exsing ers | coie |  |  |  |  | Norest |  |
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|  | Hoel | core |  |  | E475．481 | ene | voresi |  |
| － | （Resteremal | core |  |  |  | Vable | Atreatred |  |
| ${ }_{35}$ | Resiseminil ony onexssing resi | ${ }_{\text {coue }}$ |  | E0656，497 | ${ }_{\text {ctios }}$ E2020 |  | Noatreaum |  |
|  | Resisinila ony on exssing oftree |  |  |  | ${ }_{\text {E30，3039 }}$ |  |  |  |
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## Appendix 4 - Sample appraisal




[^0]:    ${ }^{1}$ The original drafting sought to apply the requirement to 11 or more units which was drafted prior to the publication of the revised NPPF which reduced the threshold to 10 units. This change will not have any impact on the viability of developments in Westminster. London Plan policy H6 has been replaced post-examination with draft London Plan policy H5

[^1]:    ${ }^{2}$ Although this document was published prior to the draft NPPF and NPPG, it remains relevant for testing local plans. The approaches to testing advocated by the LHDG guidance are consistent with those in the draft PPG. The same cannot be said of some of the approaches advocated in the RICS guidance (particularly its approach to site value benchmark) but these have always been inconsistent with the LHDG guidance and the approach now advocated in the draft PPG. In any event, the focus of the RICS guidance is on testing individual plans rather than testing plan policies.

[^2]:    ${ }^{3}$ Knight Frank PRS Update August 2017
    ${ }^{4}$ Figures for owner occupation are 30.5\% in 2011, down from 34.2\% in 2001
    ${ }^{5}$ Knight Frank UK residential market update July 2018

[^3]:    ${ }^{6}$ Viability Testing Local Plans: Advice for planning practitioners, June 2012
    ${ }^{7}$ RICS Guidance Note: Financial Viability in Planning, August 2012

[^4]:    ${ }^{8}$ The impact of indexation is discussed in section 6.
    9 As per the CIL regulations, indexation applies to rates from the November in the year prior to implementation to the current date by reference to the BCIS All-In Tender Price Index. November 2015: 271; June 2018: 314. Change is $15.87 \%$. The indexed rates are used in the appraisals.
    ${ }^{10}$ Following informal consultation in 2018 and amendments to the Plan prior to formal consultation under Regulation 19, some policy numbers changed. Where policies referenced in this report have changed number, this is indicated throughout the report to aid understanding of the viability impacts of the policies.

[^5]:    11 These figures have been arrived at following independent analysis by BNP Paribas Real Estate

[^6]:    ${ }^{12}$ For the purposes of this report, existing use value is defined as the value of the site in its existing use, assuming that it remains in that use. We are not referring to the RICS Valuation Standards definition of 'Existing Use Value'.

[^7]:    ${ }^{13}$ Viability Testing Local Plans: Advice for planning practitioners, Local Housing Delivery Group, Chaired by Sir John Harman, June 2012

[^8]:    14136 application schemes and 20 hypothetical development typologies were previously tested for establishing the Council's CIL rates. The current exercise adds an additional 20 application schemes to bring the total to 176.

[^9]:    15 Lettings listed on CoStar in March 2018; Savills: 'West End Office Market Watch' February 2018; and Jones Lang LaSalle 'Central London Office Market Report Q4 2017

[^10]:    ${ }^{16}$ Based on 'Delivering Sustainable Buildings: savings and payback', BREEAM and Sweett Group Research 2014, which identified an increase of between $0.87 \%$ to $1.71 \%$ of build costs
    ${ }^{17}$ Based on DCLH 'Housing Standards Review: Cost Impacts' September 2014
    18 As per the CIL regulations, indexation applies to rates from the November in the year prior to implementation to the current date by reference to the BCIS All-In Tender Price Index. November 2013: 239; June 2018: 316. Change is 32.2\%. The indexed rates are used in the appraisals.

[^11]:    ${ }^{19}$ The City Plan policy on commercial contributions in the CAZ changed between informal consultation in 2018 (as described in paragraphs $3.23-3.26$ and 5.5-5.9 of this report) and formal consultation under Regulation 19. The 'mixed use' element of Policy 9 was split out into its own policy (Policy 10) and the thresholds and approach were amended in line with the viability evidence presented in this report.
    20 Schemes of 1,000 or more square metres will be required to provide affordable housing on-site.

[^12]:    ${ }^{21} \mathrm{https}: / / \mathrm{evconnectors.com} / \mathrm{ev}$-homecharge-wall-
    charger?language=en\&currency=GBP\&gclid=CjwKCAiA4OvhBRAjEiwAU2FoJeyp7qmsjRVdimvXQ6m2vPIdN_cB1aBKfbLOfB dOwwZQsc1fh510DBoCt88QAvD_BwE

[^13]:    ${ }^{22}$ The original drafting sought to apply the requirement to 11 or more units which was drafted prior to the publication of the revised NPPF which reduced the threshold to 10 units. This change will not have any impact on the viability of developments in Westminster. London Plan policy H6 has been replaced post-examination with draft London Plan policy H5

