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

- 1.1 This document has been formed in response to Panel Note 9 ("NLP\_EX\_32\_Panel Note No. 9 viability") which requests that the Mayor prepares, in liaison with participants, a short summary note identifying the main areas of dispute relating to the viability evidence supporting the draft Plan.
- 1.2 Panel Note 9 identifies four areas that should be covered to help focus the discussion for Matter 92. The areas are set out below and related information can be found in Appendices A to D:
  - A list of the policies in the Plan that are likely to have a significant effect on development costs and/or development values: **Appendix A.**
  - LPVS assumptions about the costs of different types of development, with alternative figures suggested by other participants: **Appendix B.**
  - LPVS assumptions about the values of different types of development, with alternative figures suggested by other participants: **Appendix C.**
  - LPVS assumptions about benchmark land values, with alternative figures suggested by other participants: **Appendix D.**
- 1.3 The table at Appendix A includes the main policies referred to in participants' statements as having the potential to significantly effect development costs and/ or values. The focus of the note is on the main areas of dispute and policies have not been included where these were not previously referenced as significantly effecting development costs and/ or values in participants' statements. Inclusion of a policy within the table does not indicate that the GLA consider that this will have a significant detrimental impact on development viability.
- 1.4 The tables at Appendices B to D include the main cost/ value/ benchmark land value (as relevant) related viability assumptions within the LPVS and supporting documents referred to in participants' statements where alternative figures were suggested and participants indicated that inputs are too high or too low, as requested in Panel Note 9.
- 1.5 A draft version of this note was provided to participants for Matter 92. The note has been updated to indicate where participants consider that policies are likely to have a significant effect on development costs and/or values; alternative figures suggested by participants; and, where participants consider that the figures adopted should be higher or lower. Comments provided by participants which repeat points made in their previous written submissions or introduce new information which is beyond the scope of Panel Note 9 have not been included.

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

| Policy Reference | Policy Title   |  |  |  |  |  |  |  |
|------------------|--|--|--|--|--|--|--|--|
| H2 H             | Small Sites  |  |  |  |  |  |  |  |
| H5               | Delivering affordable housing                            |  |  |  |  |  |  |  |
| Н6               | Threshold approach to applications                       |  |  |  |  |  |  |  |
| H13              | Build to Rent  |  |  |  |  |  |  |  |
| H15              | Specialist older person's housing                        |  |  |  |  |  |  |  |
| H17              | Purpose-built student accommodation                      |  |  |  |  |  |  |  |
| E3               | Affordable workspace                                     |  |  |  |  |  |  |  |
| E7               | Industrial intensification, co-location and substitution |  |  |  |  |  |  |  |
| G5               | Urban greening   |  |  |  |  |  |  |  |

| SI1  | Improving air quality               |
|------|-------------------------------------|
| SI2  | Minimising greenhouse gas emissions |
|      |                                     |
| T6.3 | Retail parking                      |

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

| Theme        | LPVS Cos                                      | ts Assum                 | ptions   |                            |                         |                |                            | Participant alternative figure | Participant comment<br>where no alternative – too<br>high/ too low |
|--------------|---|--------------------------|--|----------------------------|-------------------------|----------------|----------------------------|--------------------------------|--|
| Build costs  | The build                                     | costs ap                 | plied in th  | ne LPVS va                 | ary deper               | nding on       | London First: Modelled "5% | Just Space: Costs too low.     |  |
| (residential | storey he                                     | -                        |  |                            | • .                     |                |                            | increase" to base build costs. |  |
| typologies)  | other add                                     |                          |  | -                          |                         |                |                            |                                |  |
|              | study. Pa                                     | • .                      |  |                            |                         |                |                            |                                |  |
|              | costs ran                                     | _                        |  | •                          | ing provi               | ded by c       | ost                        |                                |  |
|              | consultar                                     | nt Turner                | and Towr   | nsend.                     |                         |                |                            |                                |  |
|              | Tal   | ble 1: Base b            | uild costs £                                       | per sq m gro               | oss floorspac           | ce             |                            |                                |  |
|              | Storeys                                       | Base<br>Band A           | Base<br>Band B                                     | Base<br>Band C             | Base<br>Band D          | Base<br>Band E |                            |                                |  |
|              | 1 to 3  | £2,965                   | £2,825   | £2,708                     | £2,475                  | £2,280         |                            |                                |  |
|              | 4 to 10                                       | £3,140                   | £2,990   | £2,883                     | £2,625                  | £2,555         |                            |                                |  |
|              | 11 to 20                                      | £3,380                   | £3,220   | £3,078                     | £2,825                  | £2,760         |                            |                                |  |
|              | 21+   | £3,550                   | £3,400   | £3,254                     | £2,950                  | £2,900         |                            |                                |  |
|              | Additiona<br>costs as s<br>Standard<br>Works: | et out in                | the LPVS.  | This inclu                 | udes cost               | s for Ene      | ergy                       |                                |  |
|              | £20 p<br>5.8.1                                | er sq m f<br>4), and fir | re Enviror<br>or schemo<br>e evacuat<br>riate (LPV | es of 4-10<br>tion lifts a | storeys (<br>at £20,000 | (see LPV       | S                          |                                |  |
|              | • Energ                                       | y Standa                 | <b>rds</b> - relat<br>£1,500 p                     | ting to Lo                 | ndon LEA                |                |                            |                                |  |

| Theme | LPVS Cos   | ts Assump   | otions   |   |  |                          | Participant alternative figure | Participant comment<br>where no alternative – too<br>high/ too low |
|-------|--|---|--|---|--|--------------------------|--------------------------------|--|
|       | local l<br>play,<br>calcul<br>Stand<br>5.6.1(<br>Table 2: Ba<br>Standards, | nard and s<br>footpaths<br>ated at 8.<br>ards and 9                                     | soft landson, drainage 55% on both Safe and Son  | caping, ex<br>and servingse build of<br>Secure Envi                                 | ternal am<br>ice diversi<br>costs plus<br>vironment<br>umptions (Ei                | Energy<br>t costs (LPVS  |                                |  |
|       | Storeys  | Average Average Av  |  |   |  | Average<br>for Band<br>E |                                |  |
|       | 1 to 3   | £3,178  | £3,029   | £2,879  | £2,633   | £2,533                   |                                |  |
|       | 4 to 10  | £3,386  | £3,227   | £3,086  | £2,813   | £2,739                   |                                |  |
|       | 11 to 20   | £3,621  | £3,450   | £3,270  | £3,003   | £2,934                   |                                |  |
|       | 21+  | £3,807  | £3,647   | £3,459  | £3,137   | £3,084                   |                                |  |
|       | such a and E (LPVS)  • Sensi an Ab Addel  • Floor tested                   | Addition as Demolii lectric Vel 5.6 onwa tivity Test normal Co ndum Tab Area Effication | tion Costs<br>nicle Char<br>rds).<br>ing: Addit<br>osts scena<br>le 5.2).<br>iency Bui<br>gross to r | at £29 per<br>ging and I<br>cional cost<br>prio at £18<br>Id Cost Up<br>net efficie | er sq m ov<br>Provision f<br>as were ap<br>33/sq m (L<br>plift – The<br>ncy for ta |                          |                                |  |

| Theme                                   | LPVS Cos                     | ts Assum <sub>l</sub>                 | otions                               |   |                                   |                        |   | Participant alternative figure | Participant comment<br>where no alternative – too<br>high/ too low |
|---|------------------------------|---------------------------------------|--------------------------------------|---|-----------------------------------|------------------------|---|--------------------------------|--|
|   | the in                       |                                       | uild cost                            | reasing. T<br>rate that i               |                                   |                        |   |                                |  |
| Build costs<br>(student<br>development) |                              | d Townse                              | end are se                           | et out at T                             |                                   | -                      |   |                                | Tide Construction: Too low.  |
|   |                              | Band A                                | Band B                               | Band C                                  | Band D                            | Band E                 |   |                                |  |
|   | SR1                          | £2,497                                | £2,                                  | 459                                     | £2,307                            |                        |   |                                |  |
|   | SR2                          | £2,609                                | £2,570 £2,411                        |   |                                   |                        |   |                                |  |
|   | Additiona were add resulting | d parking<br>al Costs as<br>ed to the | cost allov<br>ssumption<br>base cost | vances (LF<br>ns relating<br>ss at £166 | PVS 5.8).<br>to abnor<br>per sq m | mal costs<br>(LPVS 6.3 |   |                                |  |
|   | Table 4: Bu                  |                                       | SR1 and SR2                          | with abnorn                             | nal costs. £ p                    | per sq m               |   |                                |  |
|   |                              | Band A                                | Band B                               | Band C                                  | Band D                            | Band E                 |   |                                |  |
|   | 9 Storeys                    | £2,663                                | £2,                                  | 625                                     | £2,473                            |                        |   |                                |  |
|   | 15 Storeys                   | 15 Storeys £2,775 £2,736 £2,577       |                                      |   |                                   |                        |   |                                |  |
|   | 15 Storeys                   | £2,775                                | £2,                                  | 736                                     | £2,                               | ,577                   | ] |                                |  |

| Theme  | LPVS Costs Assum  | ptions   |  |  |   |   | Participant alternative figure | Participant comment<br>where no alternative – too<br>high/ too low |
|--|---|--|--|--|---|---|--------------------------------|--|
|  | Additional demolit<br>m over the site are<br>relevant policy cos  | a (LPVS 6.3  |  |  | -   | sq  |                                |  |
| Build costs (mixed use / supermarket typology) | Build costs for the incorporate costs f above, and for the below.  The build costs app depending on the I park spaces (LPVS)  Table 4: Supermarket be £ per sq m on superma | or the residual supermark olied for the ocation, no Addendum   | dential control of the supermumber and 4.26).  | omponen<br>ent which<br>narket sch                 | t as set ou<br>is detailed<br>nemes vary    | Tesco:  Typology 1 (Band C) £3,509 per sqm  Typology 2 (Band B) £3,529 per sqm  Typology 3 (Band D) £2,959 per sqm  Typology 4 (Band C) £2,959 per sqm  Appendix B, Tesco March 2018 representations) | Sainsburys: costs too low.     |  |
|  | MU5   | £4,4   | 170  | £4,  | .289  |   |                                |  |
|  | MU6   | £3,0   |  | •  | .971  |   |                                |  |
|  | <ul> <li>The rates include be works, car parking</li> <li>External Works as local hard are space, play, for calculated at 8.</li> </ul>                                     | and rapid of and rapid of and relating of and soft land of the and the | electric on the state of the st | ar chargir<br>ance for v<br>external<br>nd service | ng.<br>works such<br>amenity<br>e diversion |   |                                |  |

| Theme            | LPVS Costs Assumptions  | Participant alternative figure  | Participant comment<br>where no alternative – too<br>high/ too low |  |
|------------------|---|---|--|--|
| Developer return | <ul> <li>Car Parking –58 basement parking spaces for MU5, 67 parking spaces for MU6 in Value Bands B and C and 100 parking spaces in Band D (LPVS Addendum 4.26).</li> <li>Rapid Electric Car Charging calculated at £40,000 per point (LPVS Addendum 4.26).</li> <li>Demolition allowance of £29 per sq m over the site area (LPVS 5.6.12).</li> <li>Additional Abnormal Costs equating to £183 per sq m were applied in the sensitivity testing for MU5 (LPVS Addendum Table 5.2).</li> </ul> Developer return was informed by information from | Tesco: Testing at 35% affordable  | London First (non-   |  |
|                  | various sources including developer accounts and viability appraisals assessed by the GLA (LPVS Technical Report Annex G). Returns for residential properties for sale were assessed at 15 – 20% on Gross Development Value (GDV), 11-13% on GDV for Build to Rent and 15% on GDV for non-residential development.  | housing  Viable > 20% on GDV  Marginal 15 < 20% GDV  Unviable < 15% GDV  (Appendix 1, Paragraph 6.2, March 2018 representations)  London First: 15% on GDV for Build to Rent. | residential): Too low.   |  |
| Finance          | Finance costs were informed by viability appraisals assessed by the GLA and were applied at a rate of 6.5% on development costs. Finance costs were applied to both developer return and land costs within the LPVS.  | Tesco: 6.6% adopted for testing purposes (Appendix 1, para 5.13, March 2018 representations)  | Tide Construction: Too low (student accommodation)                 |  |

| Theme      | LPVS Costs Assum   | ptions   |  |  |                                  | Participant alternative figure   | Participant comment<br>where no alternative – too<br>high/ too low |
|------------|--|--|--|--|----------------------------------|--|--|
|            | Within the LPVS A on developer returns.  |  |  |  |                                  | London First: Modelled "1% increase" (7.5%) (Consultation response 4.3.10) |  |
| CIL / S106 |  |  |  |  | •                                | CIL and MCIL rate appropriate to   | Home Builder's Federation:   |
|            | Table 5: CIL rates   |  | _  |  |                                  | Borough and Mayoral levels tested  | S106 cost could be too low.  |
|            | Band A Band B  | Band C   | Band D   | Band E   |                                  | (Appendix 1, paragraph 5.11 and  |  |
|            |  | <u>Borough</u>   | CIL  |  |                                  | Appendix B, March 2018   |  |
|            | £ 563 £ 309  | £ 128  | £ 114  | £ 63   |                                  | representations)   |  |
|            | Mayor of London CIL  |  |  |  |                                  |  |  |
|            | £80 £80  | £ 60   | £ 60   | £ 25   | J                                |  |  |
|            | CIL is typically charlowever CIL rates LPVS - CIL costs do allowed for existin (LPVS 5.8.17 to 19).  CIL costs applied in reduction allowed Regulations based.  Additional alloward of direct developments by CIL such as emposed applied. | were app<br>o not take<br>of floorsp<br>of LPVS Ad<br>I for existi<br>I on LDD of<br>the of £1,<br>ment impa | olied to all into acco ace under dendum to gloorspectors 500 per unacts/ requand training floorspectors/ | GIA floorspa<br>unt the redu<br>the CIL Regu<br>took into acc<br>pace under Ci<br>ns data.<br>nit for local r<br>irements not<br>ing (LPVS 5.8 | ount IL nitigation covered .20). |  |  |

## Mayor of London | M92: Summary of Main Areas of Dispute

| Theme          | LPVS Costs Assumptions  | Participant alternative figure  | Participant comment<br>where no alternative – too<br>high/ too low |
|----------------|---|---|--|
| Urban Greening | LPVS costs provided by Turner and Townsend included additional external cost allowance of 8.55% which included urban greening costs (see above). Cost for premium urban greening types of £41.50 per sq m applied to all development floorspace in LPVS Addendum (Annex D). | SEGRO: Additional costs of green roofs on industrial development circa £123 per sq m. | London First: Too low  |

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

| Theme                       | LPVS Valu                | e Assumpti               | ions                    |                         |                         | Participant Input  | Participant comment where no alternative – too high/ too low   |                             |
|-----------------------------|--------------------------|--------------------------|-------------------------|-------------------------|-------------------------|--|--|-----------------------------|
| Residential Sales<br>Values | of Land Re<br>Report An  | gistry Data              | and are se              | et out in Ta            |                         | sed on analysis<br>5.4, Technical                                    | London First: Modelled a scenario in which residential values were reduced by 5% to represent a reasonable test of variation in the market (consultation response, ref | were Too high nt a n in the |
|                             | Band A                   | Band B                   | Band C                  | Band D                  | Band E                  |  | 4.3.10).   |                             |
|                             | £20,000                  | £12,000                  | £8,250                  | £6,250                  | £4,250                  |  |  |                             |
|                             | testing wa               | s undertak               | en informe              | d by the m              | narket revie            | ndum. Further w at Section 2.  | <ul> <li>Tesco:</li> <li>Typology 1 (Band C) £9,146 per sqm</li> <li>Typology 2 (Band B) £9,684 per sqm</li> <li>Typology 2 (Band D)</li> </ul>                        |                             |
|                             | Addendum                 | 1                        | D-116                   | D1 D                    | D45                     | +  | • Typology 3 (Band D)  |                             |
|                             | <b>Band A</b><br>£19,714 | <b>Band B</b><br>£12,185 | <b>Band C</b><br>£8,500 | <b>Band D</b><br>£6,350 | <b>Band E</b><br>£4,675 | +  | £5,487 per sqm  • Typology 4 (Band C)  |                             |
|                             | 223,721                  | 1 - 12,133               |                         | 1 -0,000                | 1 - 1,070               | £8,608 per sqm<br>(Appendix B – Tesco March 2018<br>representations) |  |                             |

## Residential Residential rents applied in the LPVS were based on various sources London First: Ran an additional including rents advertised by agents and online and published by **Rents** scenario in which residential rents data consultancies such as Molior (Technical Report, Annex B). and values reduced by 5% to Residential rents vary by bedroom size and dwelling type. The range represent a reasonable test of of rents applied for each value band are set out in Table 2: variation to the market (consultation response Ref 4.3.10) Table 3: Build to Rent – Weekly Rents (excluding service charges) Band A Band B Band C **Band D** Band E £672 -£451 -£345 -£288 -£230 -£874 £518 £389 £1.335 f644 **Affordable** A range of affordable housing tenures were tested based on the Just Space: Too London First: reduction of 20% in **Housing Values** Mayor's preferred affordable housing products. Rents for London high - do not the London First additional Affordable Rent (LAR) and London Living Rent (LLR) were tested at reflect social scenario. the rent benchmarks published by the GLA in 2017. target rent levels. Tesco: Table 4: Weekly rents for LLR and LAR (£) Typology 1 (Band C) £4,486 per sqm **Band Tenure** • Typology 2 (Band B) D Ε В £5,207 per sqm 144-144-144-144-144-London Affordable Rent 170 170 170 170 170 Typology 3 (Band D) 270 -205-180-175-180-£2,980 per sqm **London Living Rent** 390 310 270 250 250 Typology 4 (Band C) £4,723 per sqm For London Shared Ownership (LSO) rents on retained equity and (Appendix 1, Appraisal Typology 1 shares sold were 2.50% and a 35% share sold for Value Band C; and Appendix B – Tesco March 2018 2.75% and 40% for Value Bands D and E. Discount Market Rent was representations) tested at various discounts to market rent for different value bands:

|                                   | 40% (A), 60<br>D.<br>Further inf<br>on a range<br>transaction<br>Testing wa<br>at £3,900 - | ormation v<br>of sources<br>n prices for<br>s undertak | vas conside<br>including h<br>S106 affor<br>en with LAI | ered in the<br>nousing ass<br>dable hous<br>R values at | LPVS Adder<br>ociation acting units (A<br>£2,200 per |              |     |                                 |
|-----------------------------------|--|--|---|---|--|--------------|-----|---------------------------------|
| Value of Student<br>Accommodation | Cushman a  | ind Wakefi<br>rket report                              | eld's Stude<br>s; and JLL's                             | nt Bed spa<br>UK Studer                                 | ce cost ana<br>nt Housing (                          | Q1 2017) and | N/A | Tide Construction:  • Too high. |
|                                   |  | ,  | /alue Per Uni   | it  |  |              |     |                                 |
|                                   | Band A   | Band B   | Band C  | Band D  | Band E   |              |     |                                 |
|                                   | £232,000   | £204,000   | £164,000  | £129,000  | £127,000   |              |     |                                 |
|                                   | Student ac   | dum Repor  | t which rev   |   |  |              |     |                                 |

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

| Theme         | LPVS Input/Position   |   |   | Participant Input  | Participant Comment  |                            |
|---------------|---|---|---|--|--|----------------------------|
| Residential / | BLVs applied in the s   | tudy were info  | rmed by land va   | alues for specific   | London First: Increased  | Home Builder's Federation, |
| Non-          | proposals assessed a  | is part of the p  | lanning process   | the BLV for residential  | London First, Tesco /  |                            |
| Residential   | BLVs have been calcomparison between individual site characteristics in urban denot be accounted for basis. Low, mid and las follows: | rt Annex J, LPV<br>ulated on a per<br>n sites where to<br>cteristics are no<br>evelopment site<br>r when calcular | 'S Addendum Ar<br>r unit basis whic<br>ypologies are be<br>ot known. This a<br>es and their cap<br>ting land values | testing by 20% in additional scenario based on analysis in Part 3 of consultation response (ref 4.3.10).  Tesco:  Typology 1 (Band C) f175 per sqm mixed |  |                            |
|               | Table 1 - Residentia  | al Benchmark Lan  | d Values £ per resi   | idential unit  | use (£16,000,000);  • Typology 2 (Band B)  £387.51 per sqm mixed  use (£14,500,000); |                            |
|               | Value Band  | Low   | Mid   | High   | • Typology 3 (Band D)  |                            |
|               | Band A  | £75,000   | £190,000  | £300,000   | £209.11 per sqm mixed use (£6,500,000);  |                            |
|               | Band B  | £40,000   | £75,000   | £110,000   | • Typology 4 (Band C)<br>£1,360 per sqm mixed  |                            |
|               | Band C  | £30,000   | £55,000   | £80,000  | use (£12,000,000)<br>(Appendix B March 2018  |                            |
|               | Band D  | £20,000   | £35,000   | representations)   |  |                            |
|               | Band E  | £10,000   | £20,000   | £30,000  |  |                            |
|               |   |   |   | <u>.                                      </u>   |  |                            |

| LPVS In  | out/Position   |              |                            |  |  |  |
|--|--|--------------|----------------------------|--|--|--|
| 10 as ar   | Tables 2 and 3 show the BLVs applied for typologies Res 7 and Res 10 as an example. These reflect significant variation in land values across London.  Table 2: Typology Res 7 (300 residential units) Benchmark Land Values |              |                            |  |  |  |
| Table 2:   |  |              |                            |  |  |  |
| Value<br>Band  | low  | Mid          | High                       |  |  |  |
| Band   | £22,500,000  | £57,000,000  | £90,000,000                |  |  |  |
| Band   | £12,000,000  | £22,500,000  | £33,000,000                |  |  |  |
| Band   | £9,000,000   | £16,500,000  | £24,000,000                |  |  |  |
| Band   | £6,000,000   | £10,500,000  | £15,000,000                |  |  |  |
| Band   | £3,000,000   | £6,000,000   | £9,000,000                 |  |  |  |
|  |  |              |                            |  |  |  |
| Table 3: Typology Res 10 (750 residential units) Benchmark Land Values |  |              |                            |  |  |  |
| Value<br>Band  | IOW  | Mid          | High                       |  |  |  |
| Band   | £56,250,000  | £142,500,000 | £225,000,000               |  |  |  |
|  | £30,000,000  | £56,250,000  | £82,500,000                |  |  |  |
| Band   | 130,000,000  |              | 1 1                        |  |  |  |
| Band   |  | £41,250,000  | £60,000,000                |  |  |  |
|  | £22,500,000  |              | £60,000,000<br>£37,500,000 |  |  |  |

| heme | LPVS Input/Posi  | tion                                   |                    | Participant Input | Participant Commen |  |
|------|--|--|--------------------|-------------------|--------------------|--|
|      | calculated on a f<br>uses with a smal<br>enables compari | loorspace basis t<br>ler unit size and | non-residential    |                   | ·                  |  |
|      | Table 4 – Non- Re  | sidential Benchmar                     | k Land Values £ pe | sq m              |                    |  |
|      | Value Band   | Low                                    | Mid                | High              |                    |  |
|      | Central  | £815                                   | £2,065             | £3,261            |                    |  |
|      | Inner  | £326                                   | £598               | £870              |                    |  |
|      | Outer  | £109                                   | £217               | £326              |                    |  |
|      | Table 5 show the   | e BLVs applied fo                      |                    |                   |                    |  |
|      | Value Band   | Low                                    | Mid                | High              |                    |  |
|      | Central  | £24,450,000                            | £61,950,000        | £97,830,000       |                    |  |
|      | Inner  | £9,780,000                             | £17,940,000        | £26,100,000       |                    |  |
|      | Outer  | £3,270,000                             | £6,510,000         | £9,780,000        |                    |  |
|      |  | l                                      | l                  |                   |                    |  |

| Theme | LPVS Input/Position  | Participant Input | Participant Comment |
|-------|--|-------------------|---------------------|
|       | BLVs for mixed use schemes are based on those established for        |                   |                     |
|       | residential and non-residential uses and applied proportionately for |                   |                     |
|       | the mix of uses in each typology.                                    |                   |                     |