Newport City Council
Local Development Plan

Hearing Session 4: Affordable Housing
10am – Friday 4\textsuperscript{th} April 2014
1. Site development viability assessment

(i) Does the viability assessment undertaken (based on a notional 1 hectare site free from constraints) provide an adequate basis for assessing ability to deliver affordable housing, given the heavy reliance of the housing strategy on brownfield sites with remediation requirements? What evidence suggests that this is so?

1.1 The Affordable Housing Viability Study (AVHS) (SD 61) was undertaken to provide a strategic assessment of viability for Newport. The complex and multifaceted nature of viability testing will only provide an accurate figure where site specific constraints and values are known. Site specific assessments are complex and do not provide a representative sample that the strategic assessment undertaken by NCC allows, resulting in policy preparation for every eventuality. A high level assessment will need to take a more ‘neutral’ viewpoint, and therefore the work was undertaken on the basis of a notional 1 hectare site free from constraints.

1.2 This approach was outlined in the regional South East Wales Strategic Planning Group (SEWSPG) Guidance on preparing affordable housing viability studies (October 2009), see Appendix 1. This regional guidance provides a plug in the policy gap on the provision of evidencing viability in the preparation of LDPs. It was produced with the input of SEWSPG members from the Home Builders Federation (HBF), House Builders and Housing Associations and has been utilised by many Local Authorities in Wales when undertaking their LDP, including Conwy, Anglesey, Caerphilly, Wrexham, Flintshire and Denbighshire.

1.3 The costs adopted in the AHVS relate generally to Newport and will reflect the fact that greenfield sites may sometimes have additional costs due to infrastructure loading, versus brownfield sites which may have decontamination costs. The Council note that abnormal costs reflect unusual circumstances and hence are not a basis for setting policy. This strategic level assessment therefore allows for a viability assessment to be undertaken across the sites within the LDP based on the fact that additional costs should be a consideration which impacts on land costs. The Residual Value does not need to take these abnormal costs into account; it will be a consideration for the land costs. It is worth noting that Newport has a high delivery rate of housing sites on brownfield sites and Table 4 below illustrates past examples of the successful level of affordable housing achieved on brownfield sites.

(ii) Is the viability assessment founded on reasonable assumptions as regards land values?

1.4 Land Value is the actual amount paid for land, taking into account the competition for sites. It should be distinguished from Residual Value (RV) which is the figure that indicates how much should be paid for a site. The level at which a landowner is prepared to sell is subjective.

1.5 Land supply is a key consideration when considering land values. In Newport there is a healthy housing land supply for the plan period, with a sustained provision of over 5 year supply as outlined in the Council’s response to Hearing Session 3. A good land supply will impact on the expectations of landowners because having such a fluid and competitive market will mean that landowners will be aware that their land is only one site of many on the market. It may be that even in lower value areas, such as Newport East, development in that area boosts confidence and is an incentive for development. Table 4 below illustrates
that development has been achieved in Newport East, H20, H37 & H38, and that affordable housing provision has been achieved at 15%.

1.6 The AHVS assesses the residual value of a site; which is the surplus that remains after all development costs, except land costs, have been met from revenue. The Residual Value must cover the costs of land acquisition. It is considered that the assumptions made on calculating the Residual Value are appropriate. The scheme revenue is based on average market values for each submarket in Newport. The build costs are based on BCIS values. The developer margin of 20% as a standard return for the developer and contractor. This is discussed in more detail in section 2 of the AVHS (SD61).

1.7 The SEWSPG regional guidance recommended, in paragraph 5.13, the use of the Building Cost Information Service (BCIS) in viability assessments. These costs are adjusted to reflect the Newport market and an additional 15% is added to the BCIS costs to allow for external costs such as driveways, roads, gardens, garages etc. providing a realistic cost for all required for an average site. The BCIS costs are considered to be overestimation of the real terms outlay for the major housing developers. The large house builders do not feed into these costs so this approach only allows for the higher costs of smaller house builders and Housing Associations.

1.8 For clarity, the residual value assessment based on 30 dwellings per hectare set out in Appendix 2 of the Affordable Housing Viability Study (SD61) is repeated below:

| Table 1: Results – Residual values – no grant scenarios (£s million per hectare) |
|---------------------------------|---------|---------|---------|---------|---------|---------|---------|
| 30 Dph                         | 0%      | 10%     | 15%     | 20%     | 25%     | 30%     | 35%     | 40%     |
| Caerleon                       | £1.59   | £1.42   | £1.34   | £1.25   | £1.16   | £1.08   | £0.99   | £0.90   |
| Rural Newport                  | £1.36   | £1.21   | £1.13   | £1.06   | £0.99   | £0.91   | £0.84   | £0.77   |
| Rogerstone                     | £0.91   | £0.80   | £0.76   | £0.70   | £0.66   | £0.60   | £0.55   | £0.50   |
| Newport West                   | £0.78   | £0.69   | £0.65   | £0.60   | £0.56   | £0.51   | £0.47   | £0.42   |
| Newport East                   | £0.14   | £0.12   | £0.11   | £0.09   | £0.08   | £0.06   | £0.05   | £0.04   |
| Malpas and Bettws             | -£0.18  | -£0.18  | -£0.17  | -£0.17  | -£0.17  | -£0.17  | -£0.16  | -£0.16  |

1.9 Taking the 30 dph scenario as a policy marker, the split target approach discussed in the findings of the report has been highlighted. This would give residual values between £770,000 to £900,000 million per hectare at 40% at the top end; it would give residual values of around £510,000 per hectare in the middle sub markets (at 30% affordable) and would give a marginally negative to marginally positive residual value at 10% affordable in Newport, Malpas and Bettws.

1.10 These figures are based on a package of £5,000 per unit for other Section 106 contributions, which is higher than the average cost based on the review of 7 past sites within Newport, see Table 2 below.

1.11 In conclusion, it is likely that many of the industrial sites which are brought forward for housing will be valueless in their existing use. Where property has reached the end of its economic life, and demolition and remediation costs are significant, the land value benchmark will be nil or even negative. This is a very low ‘hurdle’ for the residual value of a new housing scheme, even with affordable housing, to clear.
(iii) **Is the assumed cost of £5,000 per unit for other section 106 contributions a reasonable estimation of the likely other costs levied? Does the available evidence support this, or does it point to a minimum default assumption of £10,000 per unit, as asserted by others?**

1.12 It is considered that £5,000 per unit is a reasonable figure and, when considering the average achieved in the past set out in Table 2, it is probably an over estimate. Table 2 below takes a sample of small to medium sized developments with signed S106 agreements and a proportion of affordable housing currently within the LDP (with the exception of the Panasonic Site). This demonstrates an average of £2,877 per unit. The table also sets out which of the sites are most comparable to those remaining Housing proposal sites within the Plan.

1.13 The calculation made in Table 2 does omit those costs associated with the two largest sites within the LDP, i.e. Glan Llyn 4,000 units and Llanwern Village 1,100. The section 106 costs associated with these sites are set out in Table 3. It is considered that the amount of infrastructure required to support these sites is considerably more than the majority of other sites within the LDP. These two sites are creating communities in their own right and are not comparable to those Housing Proposals within the LDP, therefore these sites should be treated separately. Housing Proposals can often rely on current infrastructure to aid mitigation of the development therefore the level of contribution is tempered.

1.14 A housing development was permitted at the former Panasonic Site in Newport in February 2014. This is an example of a very recently signed S106 agreement which has met the 30% affordable housing target and has a modest S106 figure of £1,646 per unit. The Panasonic Site is also brownfield.
Table 2: Historic S106 Costing's

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Market Units</th>
<th>S106 cost per unit (based on Market units)</th>
<th>All Units</th>
<th>S106 cost per unit (based on All units)</th>
<th>% Affordable Housing</th>
<th>Date Section 106 signed</th>
<th>Ward</th>
<th>ACG Band</th>
<th>Toolkit Area</th>
<th>LDP Housing Proposal Site (comparable)</th>
<th>Date Section 106 Signed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orb Works</td>
<td>467</td>
<td>3148</td>
<td>550</td>
<td>2673</td>
<td>15</td>
<td>31.01.2007</td>
<td>Lliswerry</td>
<td>3</td>
<td>Newport East</td>
<td>N/A</td>
<td>2008</td>
</tr>
<tr>
<td>City Vizion</td>
<td>304</td>
<td>2138 (excluding flood defences)</td>
<td>358</td>
<td>1816 (excluding flood defences)</td>
<td>15</td>
<td>15.11.2007</td>
<td>Victoria</td>
<td>4</td>
<td>Newport East</td>
<td>East Usk Yard &amp; Herbert Road</td>
<td>2007</td>
</tr>
<tr>
<td>Panasonic</td>
<td>175</td>
<td>2351</td>
<td>250</td>
<td>1646</td>
<td>30</td>
<td>11.02.2014</td>
<td>Tredgar Park</td>
<td>5</td>
<td>Rural Newport</td>
<td>N/A</td>
<td>2014</td>
</tr>
<tr>
<td>South Wales Argus</td>
<td>66</td>
<td>2579</td>
<td>82</td>
<td>2076</td>
<td>20</td>
<td>07.02.2014</td>
<td>Gaer</td>
<td>3</td>
<td>Newport West</td>
<td>Bideford Road</td>
<td>2014</td>
</tr>
<tr>
<td>Taylors Garage</td>
<td>61</td>
<td>6222</td>
<td>71</td>
<td>5346</td>
<td>14</td>
<td>17.03.2011</td>
<td>Langstone</td>
<td>5</td>
<td>Rural Newport</td>
<td>N/A</td>
<td>2013</td>
</tr>
<tr>
<td>Hartridge High School</td>
<td>60</td>
<td>1258</td>
<td>75</td>
<td>1006</td>
<td>20</td>
<td>08.01.2014</td>
<td>Ringland</td>
<td>2</td>
<td>Newport East</td>
<td>Woodlands Site</td>
<td>2008</td>
</tr>
<tr>
<td><strong>AVERAGE TOTALS</strong></td>
<td><strong>£2,877</strong></td>
<td><strong>£2,331</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table 3: S106 Costs for Glan Llyn and Llanwern Village:

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Market Units</th>
<th>S106 cost per unit (based on Market Units)</th>
<th>All Units</th>
<th>S106 cost per unit (based on All units)</th>
<th>% Affordable Housing</th>
<th>Date Section 106 signed</th>
<th>Ward</th>
<th>ACG Band</th>
<th>Toolkit Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glan Llyn</td>
<td>3200</td>
<td>9000 (excluding community facilities)</td>
<td>4000</td>
<td>7200 (excluding community facilities)</td>
<td>20</td>
<td>31.03.2010</td>
<td>Llanwern</td>
<td>3</td>
<td>Rural Newport</td>
</tr>
<tr>
<td>Llanwern Village</td>
<td>847</td>
<td>17669</td>
<td>1100</td>
<td>13605</td>
<td>23</td>
<td>01.10.2009</td>
<td>Llanwern</td>
<td>3</td>
<td>Rural Newport</td>
</tr>
<tr>
<td><strong>AVERAGE TOTALS</strong></td>
<td><strong>£10,814</strong></td>
<td><strong>£8,581</strong></td>
<td></td>
<td><strong>18%</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
(iv) Have additional works costs been adequately factored in? Is the build cost estimation flawed in this respect? Does this render the 30% affordable housing target unsound?

1.16 It is accepted that some sites will have additional costs that are not picked up through the BCIS method which is promoted in the Development Appraisal Toolkit (DAT) as a benchmark. However, as noted above, the volume house builders in many instances can cut costs significantly lower than BCIS in so far the normal costs are concerned. Normal costs are normal costs and the basis to set policy. Abnormal costs reflect unusual circumstances and hence are not a basis for setting policy, and should be reflected in land values. It would be inappropriate to set policy according to the worst possible assumptions.

1.17 The assessment accepts that abnormal costs are a reality when dealing on a site by site basis but systematic evidence has not been provided by parties such as the HBF on providing land value benchmarks or bespoke build costs. Therefore general costs, such as the BCIS and the District Valuation (DV), are utilised. This is considered to be generous. In this respect, the viability of the target is considered sound.

(v) Are the build cost estimates associated with building regulations Part L and fire sprinklers realistic?

1.18 It is understood that the cost of implementing fire sprinklers is £3,100 per unit. This figure is derived from Welsh Government.

1.19 As this regulation is not due to be implemented until January 2016, a strong argument can be made against the inclusion of potential additional costs now. There is a) no absolute certainty that the regulation will not be once again deferred and b) a likelihood that costs will fall as the technology improves going forward.

1.20 Above all, these additional costs should be seen in the context of the housing market. Only very insignificant increases in house prices are needed to defray the additional costs. The chart below shows changes in house prices since the completion of the AHVS.

![House price index chart](chart.png)
1.21 The actual increase in prices over the period is around 2.4%. On the basis of a 3 bed terraced at £144,000 in 2012, this now means a price of £147,456 and hence an increase around £3,500. There is of course no certainty that the austerity policies of the London Government will be continued beyond 2015.

1.22 If the costs of sprinklers were for example to be £20,000 per unit, then there would be strong arguments for including them as the baseline, but the proposed £3100 is a relatively small costs which could be easily buffered out of the way by housing market changes.

1.23 It is therefore argued sprinkler costs should not be included. This stance was recently supported, at the Caerphilly and Merthyr Tydfil Community Infrastructure Levy examination.

2. Selection of a uniform affordable housing target.

(i) What evidence supports a uniform authority-wide affordable housing target of 30%?

2.1 The Affordable Housing Viability Assessment (SD61) concluded that there were three policy options available for setting an affordable housing threshold in Newport:

a) To continue with 30% threshold across the Borough
b) Introduce a three way split target reflecting local sub markets:
   - 40% for Caerleon and Rural Newport
   - 30% for Rogerstone and Newport West
   - 10% for Newport East, Malpas and Bettws

c) Introduce a four way split target reflecting local sub markets:
   - 40% for Caerleon and Rural Newport
   - 30% for Rogerstone and Newport West
   - 10% for Newport East
   - 0% for Malpas and Bettws

2.2 The Council decided to go with option A and continue to seek 30% affordable housing (subject to viability) across the whole Borough. Considering the overall need for affordable units in Newport (86% of the annual housing requirement figure as noted in the Local Housing Market Assessment – SD57), the 30% blanket approach is considered the best way of maximising the numbers of affordable units actually delivered. This is evidenced in the Table 4 below.

2.3 Table 4 lists all sites within the Plan which have a planning permission in place, are led by private developers and also secured affordable housing. It excludes sites led by Registered Social Landlords. It notes the level of affordable housing actually achieved against the level of affordable housing that would apply if a split approach (option B or C) was used. Seven sites within the Plan achieved a higher level of affordable housing than would have been achieved if the split target was in place.
<table>
<thead>
<tr>
<th>LDP Ref</th>
<th>Site</th>
<th>Ward</th>
<th>Units</th>
<th>% Affordable Housing Units Achieved</th>
<th>No. of Affordable Units Achieved</th>
<th>AVHS proposed %</th>
<th>AVHS proposed units</th>
<th>Difference in units</th>
</tr>
</thead>
<tbody>
<tr>
<td>H3</td>
<td>Llanwern Village</td>
<td>Llanwern</td>
<td>1100</td>
<td>23</td>
<td>253</td>
<td>10</td>
<td>110</td>
<td>+143</td>
</tr>
<tr>
<td>H12</td>
<td>Former Tredegar Park Golf Club</td>
<td>Graig</td>
<td>150</td>
<td>20</td>
<td>30</td>
<td>40</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>H14</td>
<td>Monmouthshire Bank Sidings</td>
<td>Pillgwenlly</td>
<td>575</td>
<td>6</td>
<td>35</td>
<td>30</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>H19</td>
<td>Hartridge High School</td>
<td>Llanwern</td>
<td>65</td>
<td>15</td>
<td>10</td>
<td>10</td>
<td>7</td>
<td>+3</td>
</tr>
<tr>
<td>H25</td>
<td>Taylors Garage</td>
<td>Langstone</td>
<td>71</td>
<td>14</td>
<td>10</td>
<td>40</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>H16</td>
<td>Penmaen Wharf</td>
<td>Pillgwenlly</td>
<td>160</td>
<td>10</td>
<td>16</td>
<td>30</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>H32</td>
<td>Sainsburys</td>
<td>Shaftesbury</td>
<td>140</td>
<td>30</td>
<td>42</td>
<td>30</td>
<td>42</td>
<td>0</td>
</tr>
<tr>
<td>H17</td>
<td>Former Hurrans Garden Centre</td>
<td>Langstone</td>
<td>60</td>
<td>20</td>
<td>12</td>
<td>40</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>H20</td>
<td>Former Robert Price</td>
<td>Victoria</td>
<td>122</td>
<td>15</td>
<td>18</td>
<td>10</td>
<td>12</td>
<td>+6</td>
</tr>
<tr>
<td>H37</td>
<td>City Vizion</td>
<td>Victoria</td>
<td>358</td>
<td>15</td>
<td>54</td>
<td>10</td>
<td>36</td>
<td>+18</td>
</tr>
<tr>
<td>H38</td>
<td>Lysaghts Village</td>
<td>Lliswerry</td>
<td>549</td>
<td>15</td>
<td>82</td>
<td>10</td>
<td>55</td>
<td>+27</td>
</tr>
<tr>
<td>H47</td>
<td>Glan Llyn</td>
<td>Llanwern</td>
<td>4000</td>
<td>20</td>
<td>800</td>
<td>10</td>
<td>400</td>
<td>+400</td>
</tr>
<tr>
<td>H30</td>
<td>Rear of South Wales Argus</td>
<td>Gaer</td>
<td>82</td>
<td>20</td>
<td>16</td>
<td>30</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>H54</td>
<td>Former Alcan Site</td>
<td>Rogerstone</td>
<td>1064</td>
<td>10</td>
<td>106</td>
<td>30</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

**TOTAL DIFFERENCE**: +597

- **Green**: Percentage of Affordable Housing that has been achieved above that proposed by the AHVS.
- **Red**: Percentage of Affordable Housing that has been achieved below that proposed by the AHVS.
2.4 Table 4 demonstrates that the 30% blanket approach creates an additional 597 affordable units when compared to the split target approach. Therefore as noted above, the Council believes that the 30% blanket approach is the best method for maximising the level of affordable housing.

2.5 It is important to note that the policy H4 of the LDP is 30% affordable housing subject to economic viability. It is acknowledged that 30% has not been achieved very often, (an average 19% of units are affordable) but it is considered that the policy needs to be at this level. If it were set at 10%, then there is no scope to seek affordable housing above this level, and it is clear from the above table that most sites within the AVHS proposed 10% zone can provide more affordable housing.

2.6 It should also be noted that the target of 30% is becoming more achievable. The windfall site at Panasonic (Tredgar Park Ward) for 250 units is providing 30% affordable housing. This is a brownfield site with a signed S106 agreement.

(ii) Does this approach reflect the findings of the Plan evidence base, and will it maximise affordable housing delivery?

2.7 Yes. The 30% blanket approach was listed as one of the three options in the Affordable Housing Viability Assessment (SD61). Therefore it is in accordance with the Plan’s evidence base. The table above demonstrates this approach will maximise the affordable housing delivery.

(iii) What is the rationale for not pursuing the 40%/30%/10% three way split option? Is there adequate justification for this?

2.8 It is accepted that the three way split option reflects the local market circumstances, but as the AHVS (SD61) notes, there are clearly ‘hot spots’ within lower percentage areas. The blanket 30% ensures that these ‘hotspots’ are covered. It is clearly evident from the above table that many of the sites within the 10% area are capable of achieving 15-20% and in the case of Llanwern Village, 23% has been achieved.

(iv) Is there adequate justification for not seeking an affordable housing contribution from sites of less than 0.33ha/10 dwellings within the settlement boundary, given the aim of maximising affordable housing provision?

2.9 Paragraph 10.6 of TAN 2: Affordable Housing 2006 states that ‘information from a Joint Housing Land Availability Study could form the basis for determining site-capacity thresholds. This will indicate the proportion of housing completions expected to be provided on different sized sites’. In Newport’s case, only 4% of the housing provision set out in the H1 summary table on page 64 of the Revised Deposit LDP is being provided by sites of less than 10 units. The AVHS (SD61) notes that the viability does not become more problematic on small sites but that it is dependent on other factors such as location, density and use values. The target is set due to the application of the 10 unit threshold set at the JHLAS study which will provide the majority of the housing supply as well as being the definition of a major site in planning application terms. It is recognised that there is a potential supply of affordable housing from sites of less than 10 units but that the use of commuted sums may be a possible mechanism for such units (see below).
2.10 Section 5 & 6 of the AHVS (SD61) outlines a viability assessment of smaller sites. It is noted that the most viable areas are where smaller sites proliferate. However, the Plan has sought to tighten its village boundaries and only has an allowance of 41 dwellings per annum within its land supply for small sites. Table 5.1 of the Affordable Housing Viability Study (SD61) notes that 267 dwellings were given permission on sites consisting of 1-9 units. On a review of the figures it was actually 293 units. When considering that if a 30% target was applied in Newport then there would only be capacity for those sites of 3 or more units to provide a whole portion of affordable housing.

2.11 Over the 3 years, there were 118 sites in total which accommodated 293 units. Only 30 sites out of the 118 sites had a capacity of 3 or more units. The 30 sites accommodate 143 units. This means that in practical terms only 143 of the 293 units could make an affordable housing provision.

2.12 When the figures are interrogated further the majority of the sites below 10 units are made up at the lower end of the scale where the site totals 3 or 4 units, the majority of which located in the higher value areas of Newport. The table below demonstrates this:

<table>
<thead>
<tr>
<th>Capacity of Site</th>
<th>Number of Sites</th>
<th>Number of Units</th>
<th>Potential Affordable Units at 30% provision</th>
<th>% of sites in high value areas</th>
<th>% of sites in low value areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>9 units</td>
<td>1</td>
<td>9</td>
<td>2</td>
<td>0%</td>
<td>100%</td>
</tr>
<tr>
<td>8 units</td>
<td>2</td>
<td>16</td>
<td>5</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>7 units</td>
<td>2</td>
<td>14</td>
<td>4</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>6 units</td>
<td>4</td>
<td>24</td>
<td>7</td>
<td>33%</td>
<td>67%</td>
</tr>
<tr>
<td>5 units</td>
<td>1</td>
<td>5</td>
<td>2</td>
<td>100%</td>
<td>0%</td>
</tr>
<tr>
<td>4 units</td>
<td>12</td>
<td>48</td>
<td>14</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>3 units</td>
<td>9</td>
<td>27</td>
<td>8</td>
<td>67%</td>
<td>33%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>33</strong></td>
<td><strong>143</strong></td>
<td><strong>42</strong></td>
<td><strong>52%</strong></td>
<td><strong>48%</strong></td>
</tr>
</tbody>
</table>

2.13 The Local Housing Market Assessment (SD57) notes the highest level of need is located within the rural hinterland and that such areas have a greater reliance on smaller sites which is justification for the setting of the affordable housing threshold in the rural areas of Newport. The threshold has been set at 3 units as it would be impractical to achieve on site provision e.g. seeking 30% on sites less than 3 units. Again, the use of commuted sums below this threshold is set out below.
Potential Use of Commuted Sum

2.14 The Council is not against the use of Commuted Sums in exceptional circumstance as set out the recent Draft Affordable Housing SPG¹. The use of such commuted sums has been resisted due to the high level of physical demand placed across Newport, 86% as set out in the LHMA (SD57).

2.15 Below the threshold, the use of commuted sums is an option. There is risk involved in this approach with the low viability associated with Newport East, Malpas & Bettws areas of Newport. If this approach of ‘in-lieu’ contributions was adopted then there would be a need to set different thresholds across Newport. In addition, the introduction of CIL within the plan period will seek contributions from one housing unit, although the monies cannot be used on affordable housing, it will only create a complex process both administratively as well as for those involved with delivering any housing site within Newport.

2.16 An additional risk of this approach is the location of sites within the rural areas of Newport which have higher values associated with land and subsequent difficulties in spending the funds. This would be less of a problem within the urban areas where land values are more varied and there is an established empty homes project within the city.

2.17 The monies in lieu of provision would need to be spent within close proximity of the area from which the section 106 agreement has been signed and development occurs. There are no restrictions on pooling the monies but it would need to be spent within a reasonable timeframe. Although there is no guidance on what that timeframe would be, it is considered that 5 years is a period that has been used in previous section 106 agreements and would be reasonable. If the monies were not spent within that timescale then it would need to be returned to the payee. The effectiveness of this approach would need to be monitored.

(v) Is policy H4 sufficiently flexible to reflect variations in development viability according to specific site circumstances and changing economic conditions?

2.18 Policy H4 notes that ‘Provision will be set to reflect site viability’. Therefore if developers can demonstrate they are unable to provide the required 30% affordable housing as a result of economic viability issues, this will be considered and the level of affordable housing can be negotiated downwards to reflect viability not to the expense of policy conformation and creating sustainable communities. It is considered this policy offers sufficient flexibility in terms of changing economic conditions.

2.19 The negotiations are undertaken using the Three Dragons Development Appraisal Toolkit (DAT). Site by site considerations are taken into account e.g. availability of school places, surpluses or deficits of open space etc. Once such information is collated then the total sum for the section 106 is set out. Where viability affects the developer’s ability to provide the total sum then an open book approach is taken. Prioritisation is then undertaken based on the site specific circumstances associated with each site.

APPENDIX 1 – SEWSPG Guidance on Preparing Affordable Housing Viability Studies
SOUTH EAST WALES STRATEGIC PLANNING GROUP

GUIDANCE ON PREPARING AFFORDABLE HOUSING VIABILITY STUDIES

October 2009

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Three Dragons

For the South East Wales Strategic Planning Group
1 INTRODUCTION

Background to the guidance

1.1 The Welsh Assembly Government has indicated that as an integral part of Local Development Plan Preparation there is a need for Local Planning Authorities (LPAs) to ensure that, in setting site-capacity thresholds and site specific targets, local planning authorities have balanced the need for affordable housing against site viability.

1.2 In line with Technical Advice Note 2: Planning and Affordable Housing it is considered that this may involve making informed assumptions about the levels of finance available for affordable housing and the type of affordable housing to be provided. TAN 2 also indicates that local planning authorities should also take into account the impact on the delivery of the affordable housing target and the objective of creating sustainable communities across the plan area and in the individual parts of the plan area.

1.3 Against this policy background, the South East Wales Strategic Planning Group (SEWSPG) have set up a sub group to explore the possibility of undertaking work at a sub-regional level to develop a standard methodology to underpin Viability Studies to inform LDPs within South East Wales.

Membership of the SEWSPG Viability Sub Group

1.4 The SEWSPG Viability Sub Group comprises representatives from the following organisations:

Welsh Assembly Government
Home Builders Federation
Nathaniel Litchfield
Redrow
Housing Associations

United Welsh
Fairlake
Hendre

Local Authority

Rhondda Cynon Taff
Caerphilly (pilot authority in using the guidance to prepare an AHVS)

Purpose of the guidance and need for Affordable Housing Viability Studies

1.5 The purpose of this guidance is to provide local planning authorities (LPAs) with step by step advice on the preparation of Affordable Housing Viability Studies (AVHSS).

1.6 LPAs require AHVSs as part of their evidence base for use in preparing LDPs. The importance of gathering evidence about development economics was identified in TAN2 which states that, in relation to setting the affordable housing target:
“The target should take account of the anticipated level of finance available for affordable housing, including public subsidy, and the level of developer contribution that can realistically be sought”. (TAN 2, Para 9.1)

1.7 Guidance from the Welsh Assembly Government on the preparation of Affordable Housing Delivery Statements (2007 – 2011)¹ by local authorities, re-iterates the importance of viability evidence in identifying targets for affordable housing delivery.

“Targets for the amount of affordable housing to be provided should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and on the likely levels of finance available for affordable housing, including both public subsidy such as Social Housing Grant and the level of developer contribution that could reasonably be secured. A viability calculation is equally relevant in a buoyant or a depressed market. The needs of both current and future occupiers should be provided for, building on evidence in the Local Housing Market Assessment.” (Para 1.24)

1.8 The courts have further emphasised the importance of robust viability evidence to underpin affordable housing policies in development plans. The Court of Appeal, in July 2008, decided on a case brought against Blyth Valley Council. The court stated that:

“……an informed assessment of the viability of any such percentage figure is a central feature of the PPS 3 policy on affordable housing. It is not peripheral, optional or cosmetic. It is patently a crucial requirement of the policy.”

1.9 Evidence on viability is also required to demonstrate the robustness of the site size threshold to be set out in the LDP. The threshold identifies the size of site above which the LPA can seek affordable housing. TAN 2 notes that,

“When setting site-capacity thresholds and site specific targets local planning authorities should balance the need for affordable housing against site viability”. (TAN2 para 10.4)

TAN2 does not provide national guidance on an indicative minimum threshold equivalent to the 15 dwellings set out by CLG in England². TAN2 leaves it up to LPAs to identify appropriate thresholds, taking into account, as well as need and site viability, their Joint Housing Land Availability Studies (see TAN2 para 10.6).

1.10 For both site-capacity thresholds and percentage targets, LPAs can set different policies for different parts of their authority – provided that the evidence base will support this.

Lack of other guidance

1.11 Although the importance of providing evidence about viability in preparing LDPs is now well established, there is no government guidance (in Wales or England) or advice from other organisations (e.g. the Planning Inspectorate) to

¹ Published by the Welsh Assembly Government in February 2009
² CLG, PPS3: Housing,2006
set out how this should be done. The guidance set out here is intended to fill this gap and provide a consistent methodology. However, it is recognised that there can be other approaches that will provide an LPA with an acceptable evidence base such as appointing the District Valuer Service to undertake the appraisal.

1.12 However, it is considered that there are benefits for LPAs in South East Wales in following a broadly consistent approach in preparing viability studies; following the Three Dragons methodology will enable this. At the same time, the Guidance recognises that the LPAs in South East Wales are different and that LPAs in undertaking an AHVS, while following the broad principles set out in this Guidance, need to tailor the details of their approach to fit their local circumstances (including variation in the need for affordable housing and market values).

Principles of AHVS and policy making

1.12 AHVSs focus on the development economics of delivering affordable housing through mixed tenure developments and are typically used in preparing policy rather than considering the viability of specific schemes (although many of the principles set out in this guidance also apply to scheme specific analysis). It is important for LPAs to recognise that the completion of a detailed AHVS will not obviate the need for site specific negotiations.

1.13 The approach set out in this guidance describes the impact of affordable housing on the residual value of development. Residual value is explained in detail in the Section 2 but can be briefly described, as the difference between the revenue generated by a housing scheme and the costs of development. AHVSs also need to take into account the impact of other s106 obligations which an LPA might seek (for instance for the provision of schools, open space, highway improvements etc) and which will also reduce residual value of a scheme.

1.14 LPAs cannot expect to have a sound LDP in the absence of robust evidence to prove the viability of affordable housing policies

1.15 However, the viability study is only one piece in the LDP evidence base and other factors such as housing needs and the development of mixed communities will also need to be taken into account by the LPA in framing its affordable housing policies (both on targets and site-capacity thresholds).

1.16 Viability evidence will identify the maximum percentage of affordable housing that can generally be achieved in mixed tenure development. This may be less or more than the need for affordable housing in an authority. What an authority cannot do is set a target for affordable housing that reflects need but not viability.

Preparation and use of the guidance

1.17 The guidance has been prepared with advice from a steering group of representatives from SEWSPG local authorities, housing associations, housebuilders and the Welsh Assembly Government.

1.19 The authors and commissioning authorities would very much like to acknowledge the assistance given by Richard Mann of United Welsh and Richard Price of the Home Builders Federation in preparing this Guide.
1.20 Users of the guidance may find it useful also to refer to the Assembly Government’s publication, ‘Delivering affordable housing using section 106 agreements: Practice Guidance, July 2008 prepared for the Assembly by Three Dragons and Cambridge Centre for Housing and Planning Research. The Practice Guidance is more relevant to the negotiation of individual schemes but does include comment on the relationship between policy and scheme negotiations and dealing with viability issues on individual schemes.
2 PRINCIPLES OF VIABILITY

What is viability in the context of mixed tenure development?

2.1 The LPA has to balance maximising its affordable housing target to deliver enough affordable housing to meet its needs with the importance of having policies that ensure sufficient land is brought forward to meet its overall housing requirements. In theory, if the affordable housing target is set too high there is a danger that sites may not come forward; set the target too low and the need for affordable housing will not be met.

2.2 The LPA therefore has to understand how the introduction of affordable housing requirements and/or other s106 requirements impact on viability. However, there is no national guidance which defines what is and what is not considered to be viable; assessing viability has to be based on evolving experience and practice.

2.3 Where scheme costs exceed scheme revenue then the scheme is clearly not viable. Where scheme revenue exceeds costs, a scheme is theoretically viable but this does not mean that it will be brought forward for development. For a scheme to be developed out, both developer and landowner need to secure (at least in principle) an acceptable return from the development.

The residual value approach

2.4 The viability assessments set out in this guidance is that of a residual value approach. This is the approach widely accepted by the development industry and it is the approach used in the Development Appraisal Toolkit (DAT).

2.5 Figure 2.1 below shows schematically the principles of the above approach. Scheme costs are deducted from scheme revenue to arrive at a gross residual value. Scheme revenue includes the combined revenue from market and affordable housing. Scheme costs assume a return to the developer and the ‘build costs’ as shown in the diagram include other development costs such as professional fees, finance costs, marketing fees and any overheads borne by the development company. This principle is explained in the DAT Guidance Notes as follows:

“The main output of the DAT is the residual value. This is the sum of money that is available to be shared between the developer and the landowner. It is a surplus that remains after all development costs, except land costs, have been met from revenue. Development costs include a standard return for the developer and contractor. The residual value will have to cover the costs of land acquisition. Any surplus remaining after land acquisition becomes 'super-normal' profit for the developer. The residual value is thus not the same as the land costs, although land costs will invariably make up the larger part of the residual. For development to be economically viable the residual must be large enough to at least cover the cost of acquiring the site.

2.6 Figure 2.1 also shows that deducted from the gross residual value will be the s106 contribution (of which affordable housing is likely to make up the major part but which can include contributions e.g. for highway works, schools, open space etc). Once this has been deducted, then what is left is a ‘net residual value’.
The amount of revenue to the scheme from an affordable unit will vary depending on the tenure of the units, whether the payment is based on a percentage of the Acceptable Cost Guidance (ACG) figure and whether grant is available. The DAT Guidance Notes provide a full description of this (see page 68).

**Relationship to Existing or Alternative Use Value**

Assessing residual value provides only part of the picture in assessing viability. A scheme is very unlikely to proceed where its costs exceed the revenue (i.e. there is a negative residual value). But simply having a positive residual value will not guarantee that development happens. The existing use value (EUV) of the site, or indeed a realistic alternative use value (AUV) for a site will also play a role in the mind of the land owner in bringing the site forward and thus is a factor in deciding whether a site is likely to be brought forward for housing.

Figure 2.2 shows how this relationship operates in theory. Residual value falls as the proportion of affordable housing increases. At some point however (shown here by point ‘b’), the scheme value will equal the existing or (where relevant) alternative use value. At this point, there is no incentive for the land owner to bring the site forward. At point ‘c’, the site is unviable as the scheme value is lower than the value of the site in its existing or alternative use.

Only at ‘a’, where there is land owner return, will there be a viable starting point.
2.11 Many sites will have only an EUV to be considered e.g. as agricultural land or a back garden or industrial use. However, some sites will have both an EUV and an AUV. This would occur, for example where a site already has permissions for another use e.g. for commercial use on currently agricultural land.

2.12 Where scheme residual is lower than the EUV and/or AUV, then it’s ‘easy to see that the development is unviable. However what happens where scheme residual exceeds EUV and/or AUV.

2.13 There are no guidelines on the uplift over EUV/AUV that is required to encourage landowner to bring forward their sites.

2.14 Current practice suggests a margin of between 20% and 30% over and above EUV and/or AUV. In preparing this guidance, an indicative figure of 25% has been noted with the HBF as a reasonable starting point for analysis. This figure should be tested at local development industry workshops (held as part of the preparation process for a AHVS) to identify if there are local circumstances that would justify the use of a different figure.

2.15 While this percentage increase over EUV ‘needed’ by landowners of brownfield land provides an indicative benchmark for use in viability analysis, it does not work for greenfield sites with an existing agricultural use. For this sort of site, the AHVS needs to consider current ‘going rates’ for land (see for example www.voa.co.uk). But LPAs also need to understand that landowners have different circumstances and requirements and what is an acceptable return for one landowner may not for another.

2.16 In the absence of other guidance on viability assessment, land owner margins will need to be considered alongside a range of benchmarks including market land values, average EUVs and by referring to recent delivery patterns.
3 MANAGING THE PROCESS

Purpose of this section of the guidance

3.1 This section of the guidance provides practical advice about managing the process of preparing an AHVS. The suggestions are drawn from Three Dragons’ experience in preparing AHVSs and other related practice guidance e.g. for Joint Housing Land Availability Studies and Local Housing Market Assessments.

Suggested principles

3.2 There are a number of suggested good practice principles that LPAs can adopt in preparing their AHVSs.

3.3 It is good practice to establish a small project team to oversee the preparation of the AHVS. As a minimum, the project team should include relevant planning and housing officers with sufficient seniority that the day to day management of the AHVS process can be undertaken by the project team. It may also be useful to include economic development colleagues and/or officers with a specialist role in negotiating and managing s106 agreements across the authority. If the authority has a property department or equivalent, at a minimum, they should be kept informed of progress in preparing the AHVS (but may be members of the project team itself).

3.4 The project team may consider it useful to prepare a ‘study brief’ to be used in keeping a wider range of council officers and other organisations (e.g. the house builders and housing associations operating in the area) informed about the process the LPA is following.

3.5 The project team will need to consider how they will keep councillors informed of progress with preparation of the AHVS. It may be that councillors (e.g. the relevant cabinet member) are informed about the AHVS as part of a wider briefing about overall progress in preparing the LDP or are kept up to date specifically about the AHVS.

3.6 A realistic timetable for the preparation of the AHVS will be needed. This should provide for enough time for consultation with the development industry as well as time for the collection and analysis of information from within the council, for undertaking the necessary analysis and, equally important, for reviewing the results and their policy implications.

3.7 When completed, the Affordable Housing Viability Study will be part of the evidence base used to assist local authorities in developing their (draft) Local Development Plan policies. The development industry (along with anyone else with an interest) will then have the opportunity to comment on the report’s conclusions and the way these have been taken forward into policy.

3.8 There is no ‘magic figure’ for how long a robust AHVS takes to prepare. They can be completed in a very short period if there are adequate resources available. But, as a very general ‘rule of thumb’, about 3 months is an appropriate amount of time from the start of the process through to final report.

3.9 Most LPAs in the South East Wales Strategic Planning Group have access to their own version of the Development Appraisal Toolkit. This provides an easy to use model to carry out the viability analysis needed to prepare the AHVS.
The LPA will need the most up to date version of the DAT available (along with the guidance notes that provide a step by step guide to the use of the DAT).

3.10 The project team (or equivalent) should check that they have the necessary skills/capacity to make best use of their DAT or agree where to get help if it is needed.

3.11 Help could be provided by a specialist consultant or from another organisation with whom the LPA works on a regular basis.
4 STEPS IN PREPARATION OF AN AHVS

4.1 The preparation of the AHVS can be broken down into a number of steps. Some of the steps are dependent on completion of a previous step but others can be undertaken independently of one another. The following list described each step in outline and the relationship between the steps is then shown in Chart 4.1. Subsequent chapters of the guidance describes each step in more details.

- **Step 1** Develop a testing framework based on reasonable and realistic policy options and consult with development industry (developer workshop) and other stakeholders; Appendix 1 sets out a typical workshop invitation;

- **Step 2** High Level Testing of notional 1 hectare site to estimate residual values (per hectare) for a range of alternative scenarios, including different amounts of affordable housing and alternative development types and across the market value areas set out in the DAT and undertake a range of sensitivity tests to show impact on residual value of an alternative set of assumptions;\(^3\)

- **Step 3** Analysis of patterns of land supply to identify ‘typical’ site types (in terms of size and previous land use) and reliance on sites of different sizes (especially to test importance of small sites to the supply). Information collected in this step is important in identifying site-capacity thresholds. Pattern of site supply also influences case study sites selected for Step 4;

- **Step 4** Identification and testing a series of case study sites. Focus is often on sites below the LPAs current policy threshold;

- **Step 5** Review results from Steps 2 and 4 and compare residual values identified with a range of comparators;

- **Step 6** report preparation.

\(^3\) LPAs can define their own market value areas but the DAT helps provide a consistent approach across South East Wales. The DAT takes into account ACG bands when required for calculating the revenue generated by affordable housing but ACG bands are distinct from market value areas.
Chart 4.1: Process for Preparing an Affordable Housing Viability Study

**Step 1**
Draft High Level Testing Framework
Including development scenarios, amount/mixes of affordable housing and level of other s106 contributions to be tested
Identify sensitivity tests to be undertaken e.g. 10% increase in market values, changed assumption about Code for Sustainable Homes

**Step 2**
High Level Testing (of notional 1 ha site)
Provides a series of residual values for the market value areas within a LPA and for the baseline and sensitivity tests defined in Step 1 (and agreed with the development industry)

**Step 3**
Analyse pattern of site supply
Assess importance to supply of different sizes of sites – highlight if need to test a (very) low site-capacity threshold

**Step 4**
Identify case study sites and test.
Case study sites to test will depend on local pattern of site supply. Testing will follow principles from the High Level Testing

**Step 5**
Review results from Steps 2 and 4 and set against comparator values
No single comparator will provide the answers but LPA will need to review how the residual values identified in steps 2 and 4 compare with other values found in their area.

**Step 6**
Report preparation
Draw on evidence from steps 1 to 5 to identify appropriate policies (for affordable housing targets and site-capacity thresholds). Prepare report that fully describes the process, information sources used and results of the AHVS.

**Preparation**
Set up project group, agree timetable, and study brief
Check resources and availability of DAT

**Development industry workshop**
Discuss key issues
Check out overall approach and detailed assumptions

(Include discussion at workshop about economics of developing small sites)
5  **STEP 1 – SETTING UP HIGH LEVEL TESTING FRAMEWORK**

**Purpose of Testing Framework**

5.1 The first step in the process of analysis is to set up the ‘High Level’ Testing (HLT) framework. This involves three main steps:

a) Agreeing baseline appraisal model;

b) Identifying the data sources to populate the model;

c) Agreeing the range of ‘tests’ to be carried out.

5.2 The HLT framework is based on the inputs of the local authority, the development industry and any other external advisers the Council may choose to call on.

5.3 A typical testing framework is set out in Appendix 2.

**Agree baseline appraisal model**

5.4 There are a number of development appraisal models in existence across the UK. They all provide a broadly similar function, which is to calculate residual value. The key differences in the models lies in their accessibility (some require a high degree of technical skill to achieve a result) and in their ability to calculate and model affordable housing revenue.

5.5 The Three Dragons DAT has been adopted across (most of) Wales as the appraisal model to be used. It has the advantage in already being populated with the base data. This includes house price, development costs, ACG revenue calculations and intermediate affordable housing revenue calculations.

5.6 To carry out an AHVS with maximum efficiency and cost effectiveness, we would therefore recommend that authorities adopt the DAT as the preferred model.

5.7 It is recommended that the information to be used in the model adopted should be agreed at the developer workshop before the HLT is commenced.

**Identifying the data sources to populate the model**

5.8 As stated in the previous section, the DAT is available to local authorities and it contains the key data sources necessary to carry out an AHVS. In theory therefore there is no need for the authority to generate any new data.

5.9 The DAT will be updated in October 2009. There are five key data sources required in this case:

i) House prices;

ii) Build costs;

iii) Benchmark rents;

iv) Market rents;

v) ACGs

5.10 The house prices in the DAT as based on sub markets within the local authorities. There are typically between five and seven sub markets for each local authority. Updating the data on the basis of the current sub market
framework can be done by reference to any property market index. Recommended sources are HM Land Registry or DCLG. Website references as follows:

http://www.landreg.gov.uk/

http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/housingmarket/livetables/

5.11 The house prices in the DAT are based on Land Registry data. The methodology for producing sub markets from this data was carried out by Three Dragons. For a simple update to the Toolkit values, can be adjusted either up or down by a percentage.

5.12 Build cost data is sourced from the Royal Institution of Chartered Surveyor’s Building Cost Information Service. Councils are recommended to subscribe to the BCIS’s Housing Online service which will then enable them to track changes in costs. The assumptions about build costs are set out in the DAT Guidance Notes. BCIS costs, are, we understand, based primarily on RSL schemes. They are adjustable to different locations across the country.

5.13 Where a local authority is already developing to Code Level 3 it is reasonable to assume that build costs based on current BCIS data broadly reflect those costs. It will be necessary to test for higher costs associated with the introduction of higher levels of the Code for Sustainable Homes (including obtaining extra credits under Ene1 – Dwelling Emission Rate). A suggested approach to sensitivity testing is set out in Chapter 6.

5.14 Other development costs are set out in the DAT. The updated (2009) version will set out the following assumptions which were agreed with HBF and other interested parties at a meeting on 7th July 2009.

Professional fees – 12% of build costs;

Overheads – 5% of build costs;

Finance – 6% of build costs;

Marketing fees – 3% of gross development value;

Developer margin – 17% of GDV of market units;

Contractor return – 5% of affordable housing construction costs

5.15 Benchmark rents are best provided through the local authority in conjunction with local RSLs. The authority will need to ensure it has a full range of rents to fit DAT template which ranges from studio flats through to 5 bed detached houses.

5.16 Market rents: These are needed to enable calculations of the value of Intermediate Rented housing. This information is best obtained through discussions with local agents or by using local property market data.

5.17 Authorities will need to decide on an appropriate figure for other (than affordable housing) s106 contributions. Ideally this figure will be inputted on a per unit basis and will cover such items as educational contributions, open space contributions, highway works and e.g. public art. The figure used should reflect the level of s106 contributions that is currently collected on a
regular basis – a ‘current going rate’. The figure used should not be aspirational. The LPA can test the potential impact of a higher level s106 contribution through the sensitivity testing process (see later).

5.18 For the purposes of carrying out an AHVS, updated or bespoke data can be inputted to the white cells within the DAT.

**Agreeing the range of tests to be carried out**

5.19 Normally with the HLT a notional one hectare site is adopted. However, this could equally be a half hectare site if that size of site is more relevant for example in a particular authority. However, since most of the comparable information is on the basis of hectares, it is useful to use a 1 ha site as the main unit used in the AHVS.

5.20 Authorities will then need to decide whether to test the notional site in the context of all of their sub markets (market value areas), or just within a sample of them. Where sub markets have prices that are very close together, then for the purposes of testing, they may decide that it is not necessary to test all sub markets. For most of the authorities within the DAT, a sampling approach is unlikely to be necessary; where for example, there are four or five sub markets.

5.21 The next step is for the authority to decide the range of affordable housing targets it needs testing. There is no single set of tests that represents best practice - LPAs will need to decide a realistic range of percentages to test and which reflect their local market circumstances. Normally this choice will reflect the current policy position as well as some more optimistic as well as pessimistic scenarios. For South Wales we would suggest the following range: 0%; 10%; 15%; 20% 25%; 30% and 35%. In some instances, with higher value sub markets, the authority could look at 40% or more. It is appropriate to discuss the range of tests to be undertaken at the development industry workshop.

5.22 Local authorities will need also to decide what tenure balance to adopt between Social Rented housing and other forms of affordable housing. This should be discussed between Housing and Planning departments and may be informed by the findings of the most recent housing market assessment.

5.23 Authorities will need to set out the densities to be tested. The DAT has a range of densities which activate specific development mixes. These mixes were agreed as a starting point by the authorities who supported the production of the DAT.

5.24 For each density, there is default development mix – as shown in the Table below.
5.25 LPAs need to identify a suitable range of densities and development mixes to test that reflect local circumstances (and which could include densities not specifically identified in the DAT). LPAs can also choose to vary the development mix for a given density (or densities) if local evidence supports this.

5.26 As with all other aspects of the Testing Framework it will be important that the densities and development mixes are discussed at an industry workshop to ensure confidence in the testing process.

**Consultation with the development industry**

5.27 It is good practice that the establishment of the HLT framework is done in conjunction with the development industry who may have a view on key data sources, viability benchmarks and the range of tests to be carried out. The industry will make their input at the workshop.

5.28 Key parties to be invited to the workshop include:
- Developers (ideally national and local);
- RSLs – local operators;
- Land owners and/or their agents;
- Market/estate agents;
- The local authority itself.

5.29 The ideal number for the workshop (including LA representatives) is between 15 and 20 people.

5.30 The format is usually round table, with a discussion lasting around two to 2.5 hours. The discussion can be managed either through a written agenda or via a Powerpoint Presentation which serves to highlight the key issues to be...
tackled and shows progress made by the local authority thus far with the project.

5.31 The issues to be covered should include:

- A general discussion about issues in delivering affordable housing that set the context for more detailed technical discussions;
- Base methodology (the DAT – if being adopted);
- Testing framework including:
  - House prices;
  - Development costs;
  - Density and Mix issues;
  - Affordable housing tests;
  - Section 106 assumptions;
  - Thresholds and small sites (viability and other issues related to the management of affordable housing in small numbers)
  - Related issues e.g. commuted sums

5.32 It is very important that the local authority keeps a good record of the discussion. The meeting notes should be circulated to all attendees and interested parties who should be given a chance (a week to 10 days is typical) to feed back prior to the commencement of the High Level Testing (see Section 6 below).
6  **STEP 2 – HIGH LEVEL TESTING**

**Getting started**

6.1 To carry out the HLT, the authority will need to identify the component data necessary to populate the model along with the agreed testing framework. As previously stated, we recommend that the DAT is used, as this contains the data necessary for the testing process.

6.2 By ‘testing’ we mean carrying out a series of calculations, each of which will have a residual value which needs to be recorded and which can then be used for comparison between sub markets, different development mixes and densities and varying proportions of affordable housing.

6.3 The flow chart below shows the linkages in the process of High Level Testing.

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**‘High level’ testing**

- Define sub markets
- Develop data sets for:
  - Dwelling prices;
  - Development costs;
  - Affordable housing revenue
- Notional 1 Ha site
- Develop testing Framework (with LAs)
- Agree density:mix
- Agree:
  - Affordable housing %
  - SR: Intermediate;
  - Other S.106 (CIL)
- Three Dragons Viability Toolkit

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**What does Stage 1 tell us?**

- Impact of affordable housing at sub market level
- Most and least likely viable sub markets;
- Likely viable SPs (%);
- What density and mix works best (and worst)

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6.4 In the diagram, the basis of the High Level Testing is a notional one hectare site. This could also be for example a notional half hectare site, although we recommend that a one hectare site is adopted as the unit of assessment so that the results are then comparable with published data on land values (e.g. Valuation Office data Property Market Report).

6.5 The idea of the High Level Testing is to examine the impacts of sub markets (a proxy for house prices), development mix and density and proportions of affordable housing on the residual values of the notional one hectare site.

6.6 The scope, complexity and extent of testing is entirely at the discretion of the local authority. A very simple HLT process could involve just testing a notional one hectare scheme in one high value and one low value sub market at say 40 dph at say 20% and 30% affordable housing. More specifically this would involve four tests (and hence calculation of residual value). As follows:
• High value sub market at 20% affordable housing;
• Low value sub market at 20% affordable housing;
• High value sub market at 30% affordable housing;
• Low value sub market at 30% affordable housing;

6.7 This may suffice in some instances for a quick ‘policy check’. However, we suggest that to produce a fully robust AHVS, it will be necessary to carry out a full range of tests across all the key variables. Typically this involves testing:
• At least four sub markets;
• At least three density: development mixes;
• At least three affordable housing percentages

6.8 This will mean doing 36 tests (4 x 3 x 3). In practice this is not a laborious process using the DAT.

6.9 As well as the baseline testing, it is good practice to include a number of sensitivity tests. These can be undertaken for all the market value areas, development scenarios and amounts of affordable housing used in the baseline testing. Alternatively the LPA can undertake the sensitivity tests for a selection of circumstances to illustrate the impact on viability of the different sensitivity tests. For example, for a high and low value market value area, at 30dph and 45 dph and with 10%, 20% and 30% affordable housing.

6.10 The LPA will need to identify the sensitivity tests undertaken in the light of local circumstances but the box below illustrates a possible range of sensitivity tests that can be used.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>i)</td>
<td>With grant and payment by the housing association based on 100% of ACG;</td>
</tr>
<tr>
<td>ii)</td>
<td>A higher percentage of Intermediate affordable housing; for example 50% Social Rent and 50% Homebuy;</td>
</tr>
<tr>
<td>iii)</td>
<td>Increase and/or decrease in house prices e.g. at 10% and 20% higher and 10% lower (with an associated increase/decrease in build costs); increases and decreases with house prices could be tested with increases and decreases in build costs. Historically, a 10% increase in prices has been accompanied by a 7% increase in build costs4.</td>
</tr>
<tr>
<td>iv)</td>
<td>A higher level of s106 contribution;</td>
</tr>
<tr>
<td>v)</td>
<td>Alternative level of the Code for Sustainable Homes.</td>
</tr>
</tbody>
</table>

---

4 The Barker Review (Kate Barker, Review of Housing Supply, Securing our Future Housing Needs, Interim Report - Analysis. December 2003 (Executive Summary) found that over time house prices have risen by 3% more than retail prices. If the same relationship is applied to house prices and build costs then a 10% increase in house prices would be accompanied by a 7% increase in build costs.
(The tests can be run separately and compared with the baseline residual values and/or in combination e.g. to show the impact of an increase in the level of s106 contributions and a higher level for the Code for Sustainable Homes)

**Crunching the numbers**

6.11 To carry out this analysis we recommend that results are presented in an Excel spreadsheet and graphs generated therefrom. The screenshot below shows how we recommend authorities carry this out.

![Graph showing residual values](image)

6.12 The table is created as results are ‘read off’ the final page of the Toolkit. Results are created for each density:development mix at different %s of affordable housing across the range of sub markets selected. The data is then transferred to the cells shown in blue and a graph generated therefrom. As further results are generated, they can be ‘cut and pasted’ into the blue cells to generate graphs of consistent format.

6.13 The graphs should demonstrate very clearly where residual values are positive and negative and the actual residuals for all instances. This is because these results will form the basis of policy setting for the authority.

6.14 The process by which the residual values are generated is usually carried out manually; i.e. by the person testing changing the data inputs according to the testing framework. We recommend this as the most appropriate way of carrying out the analysis.
7 STEP 3 – ANALYSIS OF LAND SUPPLY

Context

7.1 The pattern of site supply found in an LPA will have a bearing on the approach an LPA take towards setting its site-capacity threshold.

7.2 TAN2 recognises this and the importance of viability testing in setting site-capacity threshold(s).

“If, for example, 90% of all housing completions are expected from sites of less than 5 units, then it may be appropriate to seek affordable housing on sites of 3 or more dwellings. However, site viability will be a critical factor to be considered in determining thresholds, particularly on small sites.” (TAN 2 10.6)

7.3 TAN2 also sets out that the site-capacity threshold should apply to allocated and unallocated windfall sites (see TAN 2 10.5) and that an LPA can have different site-capacity thresholds for different parts of its area (see TAN 2 10.7).

Data requirement and sources for assessing site supply patterns

7.4 Land supply information to be used in an AHVS needs to:

- Be available on the basis of individual schemes;
- Be available for a defined time period (e.g. X years worth of completions or Y years worth of future development sites);
- Show the size of each scheme as an area (hectares) and gross number of dwellings (to be) provided;
- Identify where a scheme involves the demolition of an existing residential unit;
- Show the current/previous land use of the site.

7.5 There are three main data sources that LPAs can use in reviewing site supply:

- Historic data on housing completions – say for the most recent 3 or 5 years;
- Historic data on residential permissions (whether built out, under construction or not yet started) – say for the most recent 3 or 5 years;
- Joint Housing Land Availability Study (as noted in this context in TAN2 – 10.6).

7.6 None of the data sources is perfect for identifying site-capacity thresholds and their relative advantages and disadvantages for this purpose are summarised in the table below.
Table 7.1: Data sources for reviewing site supply patterns

<table>
<thead>
<tr>
<th>Source</th>
<th>Strengths</th>
<th>Drawbacks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions</td>
<td>Usually readily available information – including nos of dwellings, site area and showing past land use. Data usually available for different areas within the authority. Consistent historic dataset</td>
<td>Completions in one year will reflect permissions granted over a number of years and so do not show up to date pattern of land supply. Records may not always indicate where development involves demolition of a residential unit and/or previous land use. Backward looking and using the data implies an assumption that the future land supply is likely to be similar to that of the past.</td>
</tr>
<tr>
<td>Permissions</td>
<td>Usually readily available information – including nos of dwellings, site area, gross and net dwellings and showing past land use. Data usually available for different areas within the authority. Consistent historic dataset Provides a reasonable up to date picture of the kinds of site being brought forward for development</td>
<td>Not all sites with permission will be developed out; If more than one years worth of permissions is used, care will be needed to avoid duplications e.g. where a permission is simply updated in some way. Backward looking and using the data implies an assumption that the future land supply is likely to be similar to that of the past.</td>
</tr>
<tr>
<td>JHLAS</td>
<td>Forward looking land supply information</td>
<td>Limited to sites with planning permission or allocated sites – will does not take into account potential windfall sites (and these are often smaller sites) Basis for estimate of contribution from small sites (and differentiation between sizes of small sites) varies between LPAs. Often future contribution from small sites (below a 5 or 10 dwelling threshold) estimated on basis past performance</td>
</tr>
</tbody>
</table>
7.7 The choice of the data source to use will depend on their quality and availability and local preferences. But, all other things being equal, the most useful approach is likely to be a detailed analysis of recent permissions, reviewed these against up to date land availability information.

7.8 It will be necessary to decide how many years worth of permissions to use. – this will depend on the size of the dataset. Generally 3 years’ worth of permissions will be sufficient but, where the number of permissions granted per annum is limited, taking 4 or 5 years’ worth of permissions can provide a more robust dataset.

7.9 But there is a trade-off between providing a large dataset of permissions and drawing in permissions which are dated. There is no absolute rule here but it is recommended that permissions ‘older’ than 5 years are only used in exceptional circumstances.

**Practical tips for the analysis of site supply**

7.10 There are two issues the LPA needs to think about in deciding how to analyse the data on land supply.

7.11 The first is whether the LPA wants to explore the option of identifying different site-capacity thresholds for different parts of the authority and therefore whether it wants to consider patterns of land supply by sub area. This can be particularly important in mixed urban and rural areas where larger sites will be found in the main towns but land supply in the smaller settlements is more reliant on small sites. But this is not exclusively an urban/rural pattern and there may be important differences in the pattern of land supply within a large urban area.

7.12 The second is the **level of detail for the analysis**. For larger sites (e.g. over 50 dwellings) there is rarely need to consider more refined size bands than ‘50-99’ and ‘100 or more’. But, for small sites, a finer grain of analysis will be needed. Again there are no ‘rules’ for this but size bands of 5 dwellings up to around 20 dwellings would seem appropriate. If an LPA wants to review the possibility of a threshold below 5 dwellings, it should include analysis on a single dwelling basis, at least up to 5 dwellings.

7.13 The following tables illustrate two alternative approaches to analysis of site supply. Both are based on a notional analysis of 3 years worth of planning permission and are stylised examples drawing on Three Dragons experience but they do not represent any particular authority.

7.14 The first is an urban authority where land supply mainly comes from large allocated sites and the occasional windfall and where it is known that there is no significant variation in the pattern of supply from across the authority. The second is an authority with two main market towns and a large rural hinterland. There have been some large development sites in one of the market towns – and the LPA wants to explore the option of a zero threshold in its rural areas and possibly in the market towns.
Table 7.2: Alternative approaches to site supply analysis (using 3 year’s worth of permissions)

**Example A – the urban authority**

<table>
<thead>
<tr>
<th>Size of site by number of dwellings</th>
<th>% of dwellings in sites of this size</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 5 dwellings</td>
<td>5.0%</td>
</tr>
<tr>
<td>5 – 9 dwellings</td>
<td>5.0%</td>
</tr>
<tr>
<td>10 – 14 dwellings</td>
<td>5.0%</td>
</tr>
<tr>
<td>15 – 19 dwellings</td>
<td>5.0%</td>
</tr>
<tr>
<td>20 – 24 dwellings</td>
<td>10.0%</td>
</tr>
<tr>
<td>25 – 49 dwellings</td>
<td>20.0%</td>
</tr>
<tr>
<td>50 – 99 dwellings</td>
<td>20.0%</td>
</tr>
<tr>
<td>100 + dwellings</td>
<td>30.0%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

**Example B – the mixed market town and rural authority**

<table>
<thead>
<tr>
<th>Size of site by number of dwellings</th>
<th>% of dwellings in sites of this size</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Market town A</td>
</tr>
<tr>
<td>1 dwelling</td>
<td>5.0%</td>
</tr>
<tr>
<td>2 dwellings</td>
<td>2.0%</td>
</tr>
<tr>
<td>3 dwellings</td>
<td>2.0%</td>
</tr>
<tr>
<td>4 dwellings</td>
<td>1.0%</td>
</tr>
<tr>
<td>Total under 5 dwellings</td>
<td>10%</td>
</tr>
<tr>
<td>5 – 9 dwellings</td>
<td>5.0%</td>
</tr>
<tr>
<td>10 – 14 dwellings</td>
<td>5.0%</td>
</tr>
<tr>
<td>15 – 19 dwellings</td>
<td>5.0%</td>
</tr>
<tr>
<td>20 – 24 dwellings</td>
<td>10.0%</td>
</tr>
<tr>
<td>25 – 49 dwellings</td>
<td>20.0%</td>
</tr>
<tr>
<td>50 – 99 dwellings</td>
<td>20.0%</td>
</tr>
<tr>
<td>100 + dwellings</td>
<td>25.0%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
7.15 In the above examples, the urban authority might be considering a site-capacity threshold of, say, 15 or 20 dwellings. If the latter were used, affordable housing would be sought on 80% of all dwellings coming forward for permission. With the second authority, different site-capacity thresholds might be considered for the two market towns and the rural area and a zero threshold could be one option to review.

7.16 It will be important that the output from the analysis of the site supply is a clear view of the threshold options that need to be tested through the case study analysis (and described in the next chapter).
8 STEP 4 – CASE STUDY SITES

Role of case studies

8.1 To complement the analysis of the notional 1 hectare site (see Step 2), LPAs should consider the review of a selection of case study sites. These sites should illustrate site types typically found in the authority and, in particular, should include analysis of a selection of small sites if the LPA is considering introducing a low threshold (including zero).

8.2 The case studies can be one of two kinds:

- Actual sites which are typical of a particular type of site found in the area and for which the authority has the relevant information to run through the DAT. If ‘real world’ sites are used, the LPA needs to be sure that the site is representative of a type of site likely to come forward in the future;

- Generic examples based on the dataset of permissions but which do not represent any actual site.

8.3 We would recommend the application of the generic site approach, not least because testing actual schemes may set precedents for viability at site specific level.

Drawing up the case study sites

8.4 The dataset of recent permissions (described in the previous chapter) can be used to draw up the case studies based on generic examples of permissions. Suggested steps in doing this are as follows:

- Sort the permissions into the different areas of the authority for which the site size analysis has already been undertaken (see example at Table 7.2 above);

- For each area, sort the permissions in terms of number in dwellings and previous land use (including residential conversions and changes of use). Ensure that schemes which involve demolition of existing residential properties are identified and check if they are i) significant in numbers ii) associated with a particular scheme type e.g. in sub area A, there have been a number of demolition of 1 dwellings and development of three dwellings;

- Judgement is then needed to select the case studies to analyse. The case studies need to reflect the possible site-capacity thresholds identified in the previous Step (Step 3) and the profile of the site supply.

8.5 The following table indicates the kinds of case study sites which could be selected.
Table 8.1: Illustration of possible case study framework

<table>
<thead>
<tr>
<th>Urban area</th>
<th>Example of size of site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fringe land</td>
<td>Minor extension</td>
</tr>
<tr>
<td></td>
<td>15 dws</td>
</tr>
<tr>
<td>Town centre</td>
<td>Low rise apartments</td>
</tr>
<tr>
<td></td>
<td>50 dws</td>
</tr>
<tr>
<td>Inner town commercial</td>
<td>Higher density – flats &amp; town houses</td>
</tr>
<tr>
<td></td>
<td>50 dws</td>
</tr>
<tr>
<td>Edge of town commercial</td>
<td>Medium density housing, small scale</td>
</tr>
<tr>
<td></td>
<td>50 dws</td>
</tr>
<tr>
<td>Back land</td>
<td>Small infill housing dev</td>
</tr>
<tr>
<td></td>
<td>10 dws</td>
</tr>
<tr>
<td>Rural scenarios</td>
<td></td>
</tr>
<tr>
<td>Green field</td>
<td>Village extension</td>
</tr>
<tr>
<td></td>
<td>10 dws</td>
</tr>
<tr>
<td>Infill village PDL</td>
<td>Family dwellings</td>
</tr>
<tr>
<td></td>
<td>4 – 6</td>
</tr>
<tr>
<td>Exception sites</td>
<td>Small affordable development</td>
</tr>
<tr>
<td></td>
<td>6-8 dws</td>
</tr>
</tbody>
</table>

8.6 Some other practical considerations that an LPA will need to take into account in drawing up its list of case study sites include:

- Whether it is worthwhile identifying larger schemes as case studies. If the scheme type is covered by the high level testing (because it is around 1 hectare or more in size and is not an unusual site type) then identifying the scheme as a case study is probably unnecessary;

- If the LPA is considering a zero threshold, it must test sites down to 1 dwelling and would be advised to test a full range of small sites, for example at 1, 2, 3, 5, 7, 10, 12 dwellings;

- If the LPA is considering a low threshold but not zero, it will need to test a range of site sizes around the possible threshold. For example, if a threshold of 10 dwellings is an option, the LPA should consider testing at, for example, 8, 10 and 12 or 13 dwellings;

- Whether the LPA should identify a different range of case studies for different parts of the authority. This will be important if, for example with Example B shown in Table 7.2, there is a different site supply profile in different parts of the authority.

Undertaking the case study testing

8.7 Once the selection of the case studies has been agreed, they will need to be defined in terms of the mix of dwellings, the size of site and number of dwellings. The following table illustrates this – this example is weighted towards testing small sites and where a low threshold is being considered.
Table 8.2: Illustration of case studies for testing

<table>
<thead>
<tr>
<th>Case Study</th>
<th>Site Area (ha.)</th>
<th>No. Dwellings</th>
<th>Density (dph)</th>
<th>Unit Types</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>0.05</td>
<td>1</td>
<td>20</td>
<td>1 x 4 bed detached</td>
</tr>
<tr>
<td>B</td>
<td>0.03</td>
<td>1</td>
<td>33</td>
<td>1 x 3 bed detached</td>
</tr>
<tr>
<td>C</td>
<td>0.15</td>
<td>3</td>
<td>20</td>
<td>3 x 4 bed detached</td>
</tr>
<tr>
<td>D</td>
<td>0.25</td>
<td>8</td>
<td>32</td>
<td>3 x 4 bed det 5 x 3 bed semi</td>
</tr>
<tr>
<td>E</td>
<td>0.25</td>
<td>13</td>
<td>52</td>
<td>8 x 2 bed flat 5 x 3 bed terrace</td>
</tr>
</tbody>
</table>

8.8 The LPA may have more than one list of case studies which will vary between market value areas e.g. if the LPA wants to test a low threshold in its rural market value areas and a much higher threshold in its urban market value areas.

8.9 Whatever profile of case studies is selected, the DAT should be used for analysis of the residual values of each, using the following process:

- Ensure that the relevant case studies are analysed for the appropriate market value areas;
- Ensure that the same assumptions are used for the case study analysis as for the higher level testing e.g. unit sizes, s106 package, development costs, grant levels and the percentages and types of affordable housing. There may be occasions when the LPA wants to change assumptions for a particular case study but when this is done, it needs to be made explicit;
- But - ensure that the dwellings types entered are specific for the case study being tested;
- Undertake any sensitivity tests that are required;
- Produce the results in terms of the residual value for the scheme and its equivalent residual value per hectare (so that the residual value can be compared with comparator land values and with the results from the high level testing).

The particular case of small sites

8.10 A particular purpose of the case study analysis is to investigate the economics of small sites. It is often thought that they will be less viable than larger sites and therefore there is less potential to seek affordable housing and other s106 obligations from small sites. However, there is no evidence that small sites are systematically more expensive to develop and/or produce lower residual values than large sites. While large sites may benefit from economies of scale e.g. in purchase of materials, there are other costs e.g. marketing, office overhead, which are much lower for the typical developer of small sites.

8.11 Views on the development economics of small sites will need to be tested at the development industry workshop but the experience of Three Dragons is

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5 For small sites, it may seem odd to test a scheme with a % of affordable housing that is clearly less than a real number of dwellings e.g. 30% of a 2 dwelling scheme. For viability analysis to assist in policy making, this is a reasonable way to approach the analysis of small sites.
that issues such as location and site condition play as much of a role in influencing viability as does the size of the site.

8.12 There is one particular circumstance which can cause viability difficulties with small sites. This is where the development involves the demolition of an existing property on the site. The existing use value of the site will be that of a second-hand dwelling and, as such, will have a much higher existing use value than nearly every other site type.

8.13 Where the LPA has identified demolition and redevelopment of residential units as an important source of its supply of small sites and it is considering adopting a low threshold, the case study analysis will need to:

- Identify the scale of demolitions as a source of supply of small sites and how much importance should be attached to the viability issues found with them;
- Take care in comparing out-turn residual values from such sites with those of second-hand properties in the area. To do this, the LPA should obtain the best possible information about dwelling types which are demolished (in terms of their size and market value).
9 STEP 5 REVIEWING RESULTS AND COMPARING WITH OTHER EVIDENCE

Benchmarking

9.1 In Chapter 2 we set out a number of potential benchmarks against which viability might be assessed. In terms of published data on benchmark values, we would recommend that LPAs take account of the Valuation Office’s Property Market Review:

http://www.voa.gov.uk/publications/property_market_report

9.2 This sets out land values for different locations across England and Wales. The table below shows land values for selected locations in Wales. For bulk land, it suggests a range of £2.7 million (Cardiff) to £1.0 million (Merthyr Tydfil and Carmarthen).

<table>
<thead>
<tr>
<th>REGION</th>
<th>Small Sites (sites for less than five houses)</th>
<th>Bulk Land (sites in excess of two hectares)</th>
<th>Sites for flats or maisonettes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cardiff</td>
<td>£2,700,000</td>
<td>£2,750,000</td>
<td>£2,600,000</td>
</tr>
<tr>
<td>Carmarthen</td>
<td>900,000</td>
<td>1,000,000</td>
<td>1,000,000</td>
</tr>
<tr>
<td>Merthyr Tydfil</td>
<td>1,250,000</td>
<td>1,000,000</td>
<td>1,050,000</td>
</tr>
<tr>
<td>Bridgend</td>
<td>1,550,000</td>
<td>1,550,000</td>
<td>1,850,000</td>
</tr>
<tr>
<td>Swansea</td>
<td>1,750,000</td>
<td>1,750,000</td>
<td>2,200,000</td>
</tr>
<tr>
<td>Llandudno</td>
<td>1,250,000</td>
<td>1,000,000</td>
<td>1,250,000</td>
</tr>
<tr>
<td>Newport</td>
<td>2,000,000</td>
<td>2,000,000</td>
<td>1,500,000</td>
</tr>
<tr>
<td>Wrexham</td>
<td>1,250,000</td>
<td>1,000,000</td>
<td>1,250,000</td>
</tr>
</tbody>
</table>

9.3 The table, it should be emphasised, provides only a measure of land values. It does not provide a measure of viability. Viability will depend on the relationship, as described in Chapter 2, between existing (EUV) or alternative use value and scheme value (at the appropriate level of affordable housing and other s106 contributions).

9.4 The Valuation Office also provides data on industrial land values, which can be a helpful measure of EUV. Industrial land values are set out in the table below.

9.5 Both tables (Residential and Industrial land values) are taken from the Valuation Office’s Property Market Report of 2009. The report is currently produced in January and July of each year.
9.6 The values in these tables may or may not influence land owner expectations. In some instances the broad headline figures will be important; in others personal or local circumstances will determine that a site will be brought forward at a price either well above or well below the benchmark.

9.7 We understand that the District Valuer can provide bespoke land value data for authorities, where a particular authority is not covered in the Property Market Report. Appendix 3 shows a brief from a typical authority to the District Valuer.

Policy development

9.8 The HLT will provide a range of residual values that can be used to underpin policy targets for affordable housing. There are several issues to be considered in framing policy based on viability analysis. These can be summarised:

- Middle market residual values. What level of residual values are being generated in the middle market locations of the local authority area? If a single target is to be adopted, then the middle range residual value will be significant as an indicative starting point but the LPA will also need to consider viability in lower market value areas, especially if these are to deliver a significant proportion of future housing provision;

- What range of residual values are generated from highest to lowest value sub markets? What then are the implications for setting policy targets. For example, an authority may find that in a high value area a 30% affordable housing target is likely to generate a higher residual value than at 100% market housing in a lower sub market. Under these circumstances a differential policy approach with differential affordable housing targets may be justified.

- Implications for policy of grant availability. If grant is available, where should it be directed? In most instances this will be towards the weaker housing market locations but in some authorities it may be necessary to obtain grant across the whole area in order to deliver affordable housing.

- Delivery: what is historic and recent delivery? How big a ‘step change’ will be needed to get from current delivery levels to the proposed new target?

### WALES

<table>
<thead>
<tr>
<th></th>
<th>From £/ha</th>
<th>To £/ha</th>
<th>Typical £/ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cardiff</td>
<td>210,000</td>
<td>315,000</td>
<td>270,000</td>
</tr>
<tr>
<td>Carmarthen</td>
<td>160,000</td>
<td>210,000</td>
<td>190,000</td>
</tr>
<tr>
<td>Merthyr Tydfil</td>
<td>135,000</td>
<td>200,000</td>
<td>160,000</td>
</tr>
<tr>
<td>Taff Ely</td>
<td>125,000</td>
<td>205,000</td>
<td>140,000</td>
</tr>
<tr>
<td>Swansea</td>
<td>190,000</td>
<td>245,000</td>
<td>235,000</td>
</tr>
<tr>
<td>Colwyn Bay/Llandudno</td>
<td>220,000</td>
<td>330,000</td>
<td>275,000</td>
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<td>Newport</td>
<td>200,000</td>
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<td>250,000</td>
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<td>Deeside</td>
<td>220,000</td>
<td>330,000</td>
<td>247,000</td>
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</table>
• Relationship between residual values and existing use values. Where for example a local authority brings a significant proportion of its sites forward from industrial use, then at what percentage of affordable housing do residual values ‘clear’ these (industrial) values.

• Implications of types of site supply for target setting. Does the local authority have specific types of site which are routinely difficult to deliver with affordable housing? What does the evidence in the case study analysis say about these sites? Should the authority have a policy which specifically excludes certain types of sites - based on the evidence available?

• Thresholds: the authority will need to re-visit its analysis of site supply and case studies to decide whether there is a case for reducing the threshold. The balance of small to larger sites will be a deciding factor. There is usually little point for example in an authority reducing its threshold if only a marginal addition of qualifying sites then results. However some authorities will have very high housing needs and may therefore wish to opt for a very low site size threshold (including zero units) in order to capture as much additional supply as possible.

9.9 A number of related viability issues should be considered at the policy development stage. The calculation of commuted sums is a key question.

9.10 Where commuted sums are collected a possible approach to calculating the appropriate sum sought is to base this on the equivalent amount which would be contributed by the developer/landowner were the affordable housing provided on site. This is expressed as follows:

RV 100% M = Residual value with 100% market housing
RV AH = Residual value with X% affordable housing (say 20%)  
Equivalent commuted sum = RV 100% MV minus RV AH

Where
RV = residual value
M = market housing
AH = affordable housing

9.11 The DAT can be used to model this approach and we suggest that LPAs follow it in a consistent manner.

9.12 Where commuted sums are collected, the Council will need to have in place a strategy to ensure the money is spent effectively and in a timely manner. Options for spending will be a matter for the authority to consider but could include supporting schemes which would otherwise not be viable, increasing the amount of social rented housing in a scheme, increasing the proportion of family units in a scheme, seeking higher quality affordable housing (e.g. a higher level of the Code for Sustainable Homes).
10 THE AHVS REPORT

The AHVS report
10.1 As part of the LPA’s evidence base, the information collected and analysed for the affordable housing viability study should be brought together in the AHVS report. The report will need to set out:

- The process of evidence collection that lies behind the AHVS (including the role of the development industry workshop);
- All the assumptions used in the analysis – both those which are integral to the DAT (e.g. the market value areas and ACG bands), where the LPA has varied default values in the DAT (e.g. on house prices or build costs) and those that the LPA have used for their AHVS (e.g. level of s106 package);
- The range of tests undertaken for the High Level Testing and the case studies (and any sensitivity tests undertaken);
- A full set of results from all the testing undertaken and the source of any comparator land value information used.

10.2 The report should explain how the LPA has used the information from the AHVS to develop its policy options and/or preferred policy for its LDP.

Structure of the AHVS report
10.3 There is no ideal template for the AHVS report but the following is put forward as a possible structure that LPAs may find useful to follow.
Figure 10.1: A possible structure for an AHVS report

i. **Introduction**
   - Purpose of AHVS and relationship to LDP
   - Policy context – national and local (including AHDS)
   - Progress in delivery of affordable housing
   - Level of need for affordable housing
   - Research method - process of data collection, viability testing and consultation with development industry
   - Coverage of remainder of the report

ii. **Principles underlying the viability testing approach**
   - Use of residual value approach
   - Benchmarking residual values against existing/alternative use values

iii. **High Level Testing**
   - Principle of testing a 1 hectare scheme
   - Use of the DAT for calculations
   - Market value areas in DAT, variance from these and MVAs used for analysis
   - Key modelling assumptions – development scenarios, %age AH and tenure mix, s106 package, no grant/grant, any variations of default values in DAT
   - Baseline results (with further detail in an annex)
   - Sensitivity tests undertaken and results
   - Comparator land values and implications for policy making.

iv. **Land supply analysis**
   - Purpose of review of the land supply and policy context for thresholds
   - Results of site supply analysis
   - Practical considerations of providing AH on (small) sites
   - Approach to commuted sums

v. **Case study sites**
   - Purpose of analysis of case study sites
   - Selection of case study sites (and whether apply in all MVAs)
   - Modelling assumptions used
   - Results, comparator land values (especially for developments involving residential demolitions) and implications for policy making

vi. **Key findings and conclusions**
   - Summary of key findings from the AHVS
   - Review of policy options for target percentages and site-capacity thresholds – including using different targets and thresholds for different parts of an authority
   - Dealing with individual scheme viability – onus on developer to demonstrate why a scheme cannot meet policy and how DAT will be used in the process
   - Approach to use of commuted sums
   - Market conditions – any comments LPA wishes to make re short term market uncertainty versus need for policy for the longer term

**Annexes**
- Assumptions used in the modelling process
- Agreed development industry workshop notes
- Results from all the modelling undertaken (including sensitivity tests)
APPENDIX 1 – TYPICAL INVITATION TO WORKSHOP

Dear Sir or Madam

Affordable Housing Viability Study for ABC CBC Council: Consultation Workshop

ABC CBC are preparing an Affordable Housing Viability Study to inform the Council’s planning policy on affordable housing. The study will review the issue of viability, affordable housing and site supply in the borough.

An important element of the study is to obtain the views of local experts and stakeholders in the field of housing delivery. To this end we will be holding a workshop to enable housebuilders/developers, their agents, RSLs and others to participate in a discussion of the issues that will inform the study.

We would value your attendance and contribution at this workshop.

The workshop will be held at XYZ on Monday 11th January 2008

Lunch will be provided from 1.00pm with the workshop programmed from 2.00-5.00pm.

Some of the key questions that will be addressed at the workshop are:

- What are the key factors constraining the delivery of affordable housing?
- Is there an appropriate level of affordable housing that can be delivered?
- Is there a case for setting different targets for affordable housing throughout ABC CBC, reflecting the difference in house prices?
- Is there a minimum size of development needed to make affordable housing viable?
- What housing mix should be built to meet needs and demands?
- Are off-site financial contributions appropriate in the local housing market?

If you would like to attend the workshop please confirm by phone or e-mail to XYZ by Friday 7 August 2007.

Further information on the format of the workshop will be sent to those who are due to attend prior to the event.

If you have any further questions relating to the workshops please contact ABC on 0123-456-789

Yours sincerely
APPENDIX 2 – EXAMPLE OF A HIGH LEVEL TESTING FRAMEWORK

This is a typical testing framework, with examples from Caerphilly. They do not represent any other specific authorities in South Wales or elsewhere.

1 Baseline model

DAT

2 Site size base

Use a standard one hectare site for all testing.

3 Market areas

Test all four market areas for ABC CBC

4 Density and mix

Test, for all market areas according to chart (from DAT):

<table>
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<th>No.</th>
<th>Description</th>
<th>Rooms</th>
<th>0</th>
<th>10</th>
<th>20</th>
<th>30</th>
<th>40</th>
<th>50</th>
<th>60</th>
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<th>80</th>
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<td>8 Bed Bungalow</td>
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</tr>
</tbody>
</table>

Total: 100%
5 Affordable housing targets

5.1 Affordable housing targets

Test at:
10%;
15%
20%;
25%
30%;
35%

Test the range of targets at:

75% Social Rent and 25% HomeBuy. At a 40% Equity Share.

6 Other Section 106 obligations

Test at £5,000
7  Build costs

8  Unit sizes (sq m)

As per the DAT (as it brings them forward on Page 4)

9  Target Rents (Weekly rents)

These are the current rents running in the Toolkit (Caerphilly example). LAs need to check recent rents.

<table>
<thead>
<tr>
<th>Unit Type</th>
<th>Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio Flat</td>
<td>£46.45</td>
</tr>
<tr>
<td>1 Bed Flat</td>
<td>£48.56</td>
</tr>
<tr>
<td>2 Bed Flat</td>
<td>£50.67</td>
</tr>
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<td>1 Bed Terrace/Town House</td>
<td>£57.58</td>
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<tr>
<td>2 Bed Terrace/Town House</td>
<td>£60.51</td>
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<tr>
<td>3 Bed Terrace/Town House</td>
<td>£63.44</td>
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<td>4 Bed Terrace/Town House</td>
<td>£66.37</td>
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<tr>
<td>2 Bed Semi Detached</td>
<td>£60.51</td>
</tr>
<tr>
<td>3 Bed Semi Detached</td>
<td>£63.44</td>
</tr>
</tbody>
</table>
10 Affordable housing – gross to net page

As per screenshot (LAs may wish to run this sheet past the RSLs)
APPENDIX 3: - BRIEF FOR DISTRICT VALUER

ABC Council

Viability Testing

Brief for District Valuer

1. Introduction
1.1 ABC Council wishes to appoint the District Valuer to provide relevant information on current land values for defined market areas in the Borough.

2. Background
2.1 The Welsh Assembly Government has indicated that as an integral part of Local Development Plan Preparation there is a need for Local Planning Authorities to ensure that in setting site-capacity thresholds and site specific targets local planning authorities have balanced the need for affordable housing against site viability. In line with Technical Advice Note 2: Planning and Affordable Housing it is considered that this may involve making informed assumptions about the levels of finance available for affordable housing and the type of affordable housing to be provided. TAN 2 also indicates that local planning authorities should also take into account the impact on the delivery of the affordable housing target and the objective of creating sustainable communities across the plan area and in the individual parts of the plan area.

2.2 Against this policy background, the South East Wales Strategic Planning Group (SEWSPG) have set up a sub group to explore the possibility of undertaking work at a sub-regional level to develop a standard methodology to underpin Viability Studies to inform LDPs within South East Wales.

2.3 In order to ensure that this work is undertaken in an open transparent manner and is not unduly influenced by any members of the sub group, Three Dragons have been approached with a view to providing the strategic guidance for the preparation of this work. As appropriate, members of XYZ can used this methodology to inform their own viability assessments using the Three Dragons Development Appraisal Toolkit (DAT) should they choose.

2.4 As part of the local authority level work, it is necessary to obtain recent information on current land values to be considered against residual values produced by the DAT. ABC C.B.C. wishes to commission the District Valuer to provide this information on land values in order to inform the assessment of viability based on housing markets in the local authority.

2.6 Other local authorities in XYZ may commission similar information independently in due course to inform their own studies.
3. Market areas

3.1 The current version of the DAT identifies 6 market areas within XYZ based on geographical areas that exhibit similar house prices. These markets are:

<table>
<thead>
<tr>
<th>Sub Markets</th>
<th>Postcode Sectors include:</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>AB1; AB2; AB3</td>
</tr>
<tr>
<td>B</td>
<td>BB1; BB2</td>
</tr>
<tr>
<td>C</td>
<td>CB1; CB2; CB3; CB4</td>
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<tr>
<td>D</td>
<td>DB1</td>
</tr>
<tr>
<td>E</td>
<td>EB1; EB2</td>
</tr>
</tbody>
</table>

3.2 A map of each of the sub-market areas will be provided.

4. Requirements

4.1.1 The DV should provide the local authority with a figure for average current land values for each of the market areas as shown on the map for the following land uses:

- Residential
- Industrial
- Commercial
- Agricultural

5. Responding to the brief

5.1 In responding to this brief we would welcome a fee proposal for undertaking the work for the five market areas identified.

- A fee proposal to be received by…
- Appointment as appropriate on…
- Work to be completed by …

5.2 The fee proposal should be sent to xxx the contact details below.

Address details